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1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION

4 UNITED STATES OF AMERICA,  
5  
6 vs.

DOCKET NO.  
1:20-CR-00296-JPB-5-20  
VOLUME 8 (AM SESSION)

7 CARLA JACKSON and  
8 TELDRIN FOSTER,

9 Defendants.

10  
11 TRANSCRIPT OF JURY TRIAL PROCEEDINGS  
12 BEFORE THE HONORABLE J.P. BOULEE  
13 UNITED STATES DISTRICT COURT JUDGE  
14 WEDNESDAY, FEBRUARY 14, 2024

15 Appearances:

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

18 For Defendant Jackson: David D. Marshall, Esq.

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

21  
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(Court was called to order at 9:41 a.m.)

THE COURT: Good morning, everyone.

I hope everyone is well.

One administrative issue.

Ms. Mueller has put together the version of jury instructions that will go back with the jury. I had her look through all the titles to make sure those were benign. I think they are. Sometimes those titles can apply to some things but not everything. So look through there and make sure there aren't any issues with the titles.

She also added the word "form" where it says "explain the verdict." I think what is meant in those is to explain the verdict form.

So that's that. And obviously, we have a portion of those to still discuss this morning.

Let me move to that.

First off, I have now had a chance to read through the Lively and Orr cases more thoroughly, and I want to solidify and confirm my earlier preliminary ruling on that.

Having read those cases, I would just add the clarification that I think Lively actually supports a ruling in the government's favor as well.

There is no inconsistency in the cases. It's not a

1 matter of my favoring the later case, Orr. And indeed Orr  
2 cites Lively for the noncontroversial principle that a  
3 defendant can be entitled to a theory of defense instruction  
4 when there is an evidentiary foundation for it, even if the  
5 evidentiary link is weak.

6 In Lively, the Eleventh Circuit in 1986 explained  
7 that it was appropriate to give an instruction explaining the  
8 relevant law that was applicable to the defendant's defense.  
9 There, in sum, that once someone is arrested and becomes a  
10 government agent, they can no longer be a co-conspirator.

11 But that's not what we have in Mr. Foster's  
12 proposed instruction here. It isn't instructing the jury on  
13 the applicable law, the theory of defense. Mr. Foster's  
14 proposed instruction doesn't explain any applicable law.

15 Instead, it's just a listing of Mr. Foster's  
16 various contentions, what he views the facts to be here. And  
17 that, as I noted last night and as Ms. Chaiken argued, is  
18 impermissible under Orr.

19 It's little more than defendant-friendly commentary  
20 evidence, what he contends the evidence shows. It's merely a  
21 judicial narrative of his version of facts or putting the  
22 defendant's desired factual findings in the mouth of the  
23 Court.

24 To the extent that Mr. Foster wants instructions  
25 about the law, conspiracy, intent, knowledge, willingness, I

1 believe instructions touching on those issues, in whole or in  
2 part, are already included. And I will certainly entertain  
3 instructions on the law that anyone desires, and I have done  
4 so in this case.

5 Turning next to the issue involving the missing  
6 witness that you briefed for me overnight and into this  
7 morning, and thank you for those briefs, I want to first ask  
8 Ms. Chaiken, you mentioned it last night and you mentioned it  
9 in your brief but I just want the record to be clear.

10 In my experience both as a practitioner in the  
11 Northern District and as a judge here, the matter of granting  
12 someone immunity is not a five-minute procedure or even a  
13 five-hour procedure. It's perhaps a five-day, or more,  
14 procedure.

15 But I want the record to be clear on what exactly  
16 that takes in a case like this where we have you; we have the  
17 Fraud Section of main Justice here as well.

18 I know that when you were asked about that, you  
19 stated -- bear with me for one moment -- that "We're not  
20 authorized to grant Mr. Dixon immunity, nor are we going to."

21 So I would just like the record to be clear on what  
22 that procedure is and how long that procedure generally  
23 takes.

24 MR. KAUSHAL: Yes, Your Honor.

25 There are -- and this is my understanding of how

1 this process works is that there are two ways where immunity  
2 can be sought. There is one that is statutory immunity that  
3 requires going to -- completing multiple levels of review and  
4 paperwork that goes to main Justice, and that takes a fairly  
5 significant amount of time.

6 There is also a form of immunity known as letter  
7 immunity that an AUSA can seek in an instance, where  
8 appropriate, after receiving supervisory approval.

9 And there are also additional requirements in this  
10 case beyond our office's requirements because DOJ Fraud  
11 Section is also involved, and there is also an approval  
12 requirement through their process as well.

13 So letter immunity is an informal type of immunity  
14 that sometimes can be done fairly quickly. However, to ask  
15 the government to investigate and understand that, after  
16 declining to explain this to us repeatedly over the nine  
17 months coming to trial, the week from when we first previewed  
18 the issue in front of Your Honor to last, now, I believe, the  
19 night before last, at the end of the day when we again tried  
20 to broach this issue with the defense and they just declined  
21 to talk to us about it.

22 And then at the last moment possible, they come in  
23 and ask us to pursue immunity, while we're in the middle of  
24 the trial, that's simply not something that -- that we were  
25 not authorized to do it at that moment because we would have

1 had to have taken a break; we would need to understand the  
2 facts; we would need to understand what specifically the  
3 defendant was going to -- the testifying defendant would have  
4 testified to, Mr. Dixon.

5 Because what if, hypothetically, Your Honor,  
6 Mr. Dixon came up on the stand and said something we had no  
7 idea he was going to say. For example, this is just a  
8 hypothetical, but I'll say this:

9 What if Mr. Dixon were to say "Me and Darrell  
10 Thomas robbed a bank together and I owed him for that because  
11 he didn't snitch on me when we robbed that bank."

12 Or "Me and Darrell Thomas shot somebody and we  
13 never told anybody, and that's the reason why I" -- according  
14 to the defense, he's going to testify that he would have said  
15 he took instruction from Darrell Thomas.

16 What if he said that on the stand, Your Honor?  
17 That would be something that if we just blindly gave him  
18 immunity without any knowledge about what actually occurred,  
19 it would be irresponsible.

20 And while I don't know what would have happened if  
21 we had gone down and sought supervisory approval, assuming we  
22 could even get it from main Justice and we could get access  
23 to our supervisor in the middle of the trial, I don't know  
24 if -- you know, they're going to have questions for us.

25 And that is why the representation was made that we

1 didn't have authorization to do it at that time, because we  
2 didn't.

3 THE COURT: All right. Well, what's your best  
4 estimate as to how long it would take to get those various  
5 types of approvals?

6 And let's be clear about which ones you would have  
7 needed here.

8 MR. MOORE: I'll speak for the Fraud Section  
9 because I think that is the more stringent approval here.

10 I would need authority from a deputy assistant  
11 attorney general, in writing. I would have to have submitted  
12 that in writing, first to my assistant chief, then to the  
13 chief of my section, who would both have to approve it, who  
14 would then send it to a different building to the deputy  
15 assistant attorney general.

16 And that, even in a rush scenario, I have never  
17 heard of it being done in faster than a week because it would  
18 go with all the other approvals that need written approval.  
19 So that would have been the process from the Fraud Section.

20 And from the Fraud Section, even though we do offer  
21 letter immunity for proffers, for immunity for testifying in  
22 court, it has to be written approval from the deputy  
23 assistant attorney general.

24 So we wouldn't have authorized letter immunity in  
25 this situation.

1 MR. KAUSHAL: And one other note, Your Honor, there  
2 is no guarantee that Mr. Dixon would have accepted letter  
3 immunity, even if we had offered it, because it's not  
4 coextensive with the type of immunity one would receive  
5 through the more formalized statutory process that is  
6 available that takes much longer.

7 THE COURT: All right. Thank you.

8 I just wanted to clarify that issue.

9 I think our one of, if not the guiding case here,  
10 is Rafael case, 487 Fed. Appx. 490, which states: A party  
11 who is unavailable by virtue of claiming the Fifth Amendment  
12 or another privilege does not support a missing witness  
13 instruction.

14 And applying that clear statement of the law from  
15 the Eleventh Circuit, the missing witness instruction would  
16 be improper here.

17 Of course, Judge Martin in that case went on to  
18 note that the court was aware of other circuits alluded to  
19 exceptions to the general rule where the substantial showing  
20 of an abuse of prosecutorial discretion and have also left  
21 open the possibility an exception where circumstances suggest  
22 the witness's testimony would have been exculpatory.

23 So we don't even know if the Eleventh Circuit would  
24 do that. But assuming for the sake of argument the Eleventh  
25 Circuit would adopt what other circuits have done with those

1 two exceptions, I don't think either of those exceptions  
2 apply here.

3 Certainly, there has been no showing of an abuse of  
4 prosecutorial discretion. Quite to the contrary, the record  
5 has laid out -- and the government's brief of this morning  
6 shows that, back on February 5, the government was exploring  
7 this issue and again invited the defense on the issue a  
8 couple days ago, and the defense had declined to pursue the  
9 issue with the government then when, perhaps, if back then it  
10 had happened, maybe there could have been immunity. But we  
11 will never know because the defense never pursued it at that  
12 time.

13 As far as whether circumstances suggest the  
14 witness's testimony would have been exculpatory, I don't  
15 think we have that here, either.

16 What we have here, at best, as noted in the  
17 government's footnote 7 of Docket 924, is Thomas instructing  
18 Dixon to identify Foster. It's not exculpatory because it  
19 doesn't show that Foster wasn't involved, as the government  
20 notes it merely shows that Thomas, having been indicted and  
21 while fighting these charges, wanted to deflect blame.

22 And indeed, as Ms. Chaiken notes, even the defense  
23 recognized it would be, at most, favorable but not  
24 exculpatory.

25 And I would add, bluntly, to give the instruction

1 in this circumstance I think would be a miscarriage of  
2 justice. And I decided to exercise my discretion not to do  
3 so.

4 If the defense really wanted to have explored this,  
5 they could have done it long before the moment of testimony.

6 In the Second Circuit's Myerson case -- and I don't  
7 have the cite in front of me, I apologize -- they noted there  
8 is the usual aura of gamesmanship. And here I think we have  
9 that element of gamesmanship. The defense was invited  
10 numerous times, early on, or earlier on in one occasion and a  
11 little earlier on in a second occasion, to explore this and  
12 they declined.

13 And instead, as far as what the information is  
14 about what the witness would have said, we got the cryptic  
15 statement from defense counsel that it was, quote, "based on  
16 communications that have not happened in this courtroom,"  
17 whatever that means.

18 This is not a situation in which the government was  
19 presented with information that was clearly exculpatory and  
20 then had time to get immunity and didn't do it. It's the  
21 exact opposite of that. Neither of those things are true.

22 And I would also add -- and it's not important to  
23 the decision because the decision stands, nevertheless, I  
24 would add here that I explored two ways of going about what  
25 Mr. Dixon would or wouldn't say, or would or wouldn't invoke

1 his Fifth Amendment privilege on, one of which kept this  
2 entirely away from the jury which, in hindsight, I think  
3 would have been the more prudent course, and the other was to  
4 put it all on the record in front of the jury.

5 And the defense wanted to ask their questions in  
6 front of the jury; the government didn't.

7 And I think I probably, in hindsight again, made a  
8 mistake by letting the jury hear all that. But I did, and  
9 those questions and his invocation of the Fifth Amendment  
10 were all in front of the jury.

11 I recognize, having seen the Feliciano-Franciso 701  
12 Fed. Appx. 808, cite from the Eleventh Circuit 2017, that it  
13 was probably an error even to let the jury hear that. But it  
14 was obviously to the defense advantage and the government's  
15 disadvantage.

16 So my ruling would stand even without that factor  
17 but that factor even makes, in my opinion, it easier to  
18 exercise my discretion and not give this instruction.

19 All right.

20 MS. DURRETT: Your Honor, can I be heard -- or make  
21 a record?

22 THE COURT: Yes, Ms. Durrett.

23 MS. DURRETT: Thank you, Your Honor.

24 I just wanted to note, Your Honor, that we were not  
25 asking for Court to force the government to grant immunity.

1 We were not asking for the government to grant immunity for  
2 Mr. Ricky Dixon. Mr. Dixon's attorney asked for that.

3 And the inference in the case, the inference that  
4 we are requesting to tell the jury about is: There are two  
5 parties in this case. One of them had the ability to call a  
6 witness if that witness supported their case. The other  
7 party could not call that witness. That's the inference.

8 It's not an inference that, hey, we asked you to  
9 grant him immunity and you denied it.

10 We didn't ask for that. It's not our duty to  
11 request immunity for that person. Mr. Berne requested it.  
12 They denied it.

13 But the inference is not, hey, we asked for  
14 immunity and you denied it. The inference is, two parties  
15 had a witness, one of them could make that person available  
16 to testify if they wanted to do it, and they had years to do  
17 it, but they chose not to and the other party brought him  
18 here and could not make him testify. That is the inference  
19 that is involved.

20 It's not an inference that we requested that you go  
21 to your supervisors and grant immunity. That is not it. We  
22 did not make that request.

23 We were not able to call him. They were able to  
24 call him if they wanted to. That is the inference that we  
25 want to tell the jury about.

1 And I understand the Court's ruling, but --

2 THE COURT: But that assumes that they had the  
3 information, and they didn't, Ms. Durrett.

4 MS. DURRETT: Your Honor, they interviewed him.

5 THE COURT: You had it based on -- what was the  
6 quote?

7 You had it, quote, based on "communications that  
8 have not happened in this courtroom."

9 The government didn't have that.

10 MS. DURRETT: But, Your Honor --

11 THE COURT: In fact, the government only found out  
12 that Dixon was even a witness when they got the call from the  
13 Bureau of Prisons because the Bureau of Prisons thought that  
14 it was their witness.

15 So I think that that's an ill-founded additional  
16 argument.

17 It's 10:00. Do we have the jury, Officer?

18 All right. Let's bring them out.

19 Ms. Chaiken, I'm sorry I didn't give you a chance  
20 to respond to that.

21 Do you have anything to add?

22 MR. KAUSHAL: Your Honor, nothing -- I think she's  
23 misstating the law. It's incorrect what she said. Under the  
24 law it's clear that it's clearly incorrect.

25 And the government will rest on its briefing.

1 THE COURT: Very well.

2 So, obviously, those two instructions won't be part  
3 of what I'm giving.

4 Has everybody had a chance to look at the final of  
5 instructions and the titles and everything?

6 LAW CLERK: I just sent them.

7 THE COURT: We'll just do that before we get there.  
8 And let me know if there are any issues.

9 MR. MARSHALL: Judge, are we getting hard copies of  
10 those soon?

11 THE COURT: They have been sent. Check your  
12 in-boxes.

13 MR. MARSHALL: Okay. Thanks, Judge.

14 THE COURT: Are we otherwise ready for your  
15 closings?

16 MS. CHAIKEN: Yes, Your Honor.

17 THE COURT: Okay.

18 MS. WEBSTER: Your Honor, I just wanted to note  
19 that we will need a brief break to adjust for technology  
20 issues.

21 (Jury enters the courtroom at 10:01 a.m.)

22 THE COURT: You all can be seated.

23 Good morning, ladies and gentlemen of the jury.

24 THE JURORS: Good morning.

25 THE COURT: Happy Valentine's Day.

1 All right. We are now going to hear closing  
2 arguments. We will hear from the government and then we'll  
3 hear from the defense.

4 Ms. Chaiken.

5 MS. CHAIKEN: Thank you, Your Honor.

6 GOVERNMENT'S CLOSING ARGUMENT

7 MS. CHAIKEN: Good morning.

8 THE JURORS: Good morning.

9 MS. CHAIKEN: The evidence in this case has shown  
10 that Teldrin Foster and Carla Jackson both participated in  
11 fraud during a time of national crisis.

12 You heard evidence in this case of 14 fraudulent  
13 Paycheck Protection Program loans that were approved during  
14 the pandemic, each for more than \$700,000. A total of more  
15 than \$11 million, and you saw that each of these loans was  
16 fraudulent.

17 You saw the tax forms, the Form 941s that were  
18 submitted with each of these loan applications.

19 You saw that seven of the 14 businesses, half of  
20 them, submitted identical Form 941s for every quarter of  
21 2019.

22 You saw that these documents all had the same fake  
23 stamps on them.

24 You heard testimony from the IRS that none of these  
25 businesses had ever filed a Form 941 in 2019. Every document

1 was fake.

2           You saw fake bank statements that were submitted  
3 with some of these applications. You saw the real  
4 statements, you saw the fake ones and you saw that some of  
5 the businesses submitted identical bank statements to each  
6 other.

7           You saw the payroll spreadsheets that were created  
8 with identical numbers and just changing names.

9           And you saw the fabrication of the documents. You  
10 saw them going back and forth in emails with numbers  
11 changing, names changing, information changing.

12           And finally, you saw the bank records that show  
13 that none of these businesses had any business at all, had  
14 any payroll.

15           And you heard that after they got the money, they  
16 didn't spend it on payroll. They sent the money to Darrell  
17 Thomas. They spent it on personal expenses. They moved the  
18 money around to the people that helped them get the loan.

19           Teldrin Foster is charged with various crimes in  
20 connection with his involvement in these PPP loans. For each  
21 loan, he is charged with wire fraud. If the lender that  
22 issued the loan was federally insured, he is also charged  
23 with bank fraud and with false statements to a federally  
24 insured financial institution.

25           The judge will instruct you that those are two

1 crimes that require the victim to be a federally-insured  
2 financial institution. And as you heard, some of the lenders  
3 in this case were and some of them were not.

4 He's also charged in connection with each loan to  
5 commit conspiracy to commit bank fraud or wire fraud, which  
6 is basically an agreement to commit those crimes of bank  
7 fraud or wire fraud.

8 And finally, he's charged with money laundering.

9 Judge Boulee will instruct you that wire fraud has  
10 four elements. And I will charge you with wire fraud because  
11 Mr. Foster is charged with wire fraud as to each and every  
12 one.

13 The first element is that Mr. Foster knowingly  
14 devised or participated in a scheme to defraud someone by  
15 using false or fraudulent pretenses, representations, or  
16 promises.

17 And Judge Boulee will explain to you that a scheme  
18 to defraud means a plan or course of action intended to  
19 deceive or cheat someone out of money or property.

20 The government does not have to prove that the  
21 alleged scheme actually succeeded in defrauding anyone.

22 And one important thing to remember here, because  
23 you have heard that other people were involved in this scheme  
24 as well, is that Mr. Foster is also charged with aiding and  
25 abetting, which means he doesn't need to have personally

1 performed every act charged.

2           Instead, he needs to have intentionally joined with  
3 a person to commit a crime and he's criminally responsible  
4 for the acts of people he criminally joined, he intentionally  
5 joined with.

6           You saw evidence in this case that Teldrin Foster  
7 joined with Darrell Thomas to commit PPP fraud as to each of  
8 these loans. You saw that from the very beginning of the PPP  
9 program, before applications were even being accepted, he was  
10 communicating with Darrell Thomas, via WhatsApp, about the  
11 Paycheck Protection Program.

12           You saw that Darrell Thomas found online a Paycheck  
13 Protection Program request form and sent it to Teldrin Foster  
14 on WhatsApp, and Teldrin Foster said, "that easy?" And  
15 Darrell Thomas said, "hell yeah."

16           That was the very beginning of their plan to commit  
17 PPP fraud. And you saw how they got started immediately with  
18 the loan for Bellator Phront Group.

19           You saw that Teldrin Foster helped Darrell Thomas  
20 create a fake bank statement for that business, and they  
21 exchanged multiple versions back and forth.

22           You saw that Darrell Thomas and Teldrin Foster  
23 figured out that they needed to get tax forms. And it was  
24 Teldrin Foster's idea that they needed to stamp the form.

25           And then you saw that Teldrin Foster got those

1 stamps. He told you he got it from someone who just moves  
2 off of money, someone who made the stamps for him, and he  
3 sent those stamps to Darrell Thomas. And then you saw how  
4 those stamps ended up on the Form 941 that Bellator submitted  
5 with its loan application.

6 You also saw how he worked together with Darrell  
7 Thomas to create a payroll spreadsheet. We'll talk more  
8 about this later but you saw that he got the list of employee  
9 names, and then he got his wife who worked for the IRS to  
10 make a template for him with the payroll information.

11 And you heard Teldrin Foster's own words. You  
12 heard him say, "I knew the shit was wrong. We were  
13 manipulating paperwork for him to get a loan."

14 (Audio was played.)

15 MS. CHAIKEN: You heard him say, again and again  
16 and again, that they were manipulating documents. He said,  
17 "me and him." "Me and Darrell Thomas."

18 (Audio was played.)

19 MS. CHAIKEN: And you heard him say in his own  
20 words, "to get the money was fraud."

21 (Audio was played.)

22 MS. CHAIKEN: You saw that after they worked on the  
23 Bellator loan, they just cookie-cuttered it and moved on to  
24 other businesses. And you saw the same pattern where Darrell  
25 Thomas would send Teldrin Foster, via WhatsApp, information

1 for a business, and then the next day or the same day Teldrin  
2 Foster, using his iCloud account, would send Darrell Thomas  
3 forms for those businesses, identical forms. You saw them.  
4 All he was doing was changing the business name.

5 And then, for example, with Impact Creations, when  
6 the loan was approved, what did Darrell Thomas do? He sent  
7 that to Teldrin Foster via WhatsApp. He was telling him,  
8 "our scheme worked. This loan was approved."

9 And not only did he tell him it was approved, he  
10 also made sure that Teldrin Foster got paid by Impact  
11 Creations using that loan money.

12 You saw the same thing for Gaines Reservation and  
13 Travel. Teldrin Foster creates documents, identical  
14 documents, for the business. And then when there is  
15 something that needs to be fixed in the document, Darrell  
16 Thomas sends it to Teldrin Foster via WhatsApp.

17 And again, when the loan is approved, Darrell  
18 Thomas tells Teldrin Foster, Teldrin Foster says "LOL bet."  
19 And Darrell Thomas says, "Black Jesus."

20 You saw the same pattern for Transportation  
21 Management Services. Business information goes into Teldrin  
22 Foster's WhatsApp. Immediately after that, it comes out from  
23 Teldrin Foster to Darrell Thomas with documents prepared for  
24 that business.

25 Same thing with Lee Operations. Business

1 information goes to Teldrin Foster. Teldrin Foster creates  
2 the documents.

3 Same pattern for RK Painting.

4 D Parker Holdings, same pattern. The WhatsApp goes  
5 to Teldrin Foster, and then Teldrin Foster creates the  
6 documents.

7 And with D Parker Holdings, you started to see  
8 something interesting. This is where you saw Gena Pyfrom  
9 come into the picture. And you know that because you can  
10 look at the timing on these emails.

11 On June 4 of 2020, the iCloud account sent Darrell  
12 Thomas a payroll spreadsheet, and it was that identical  
13 payroll spreadsheet that was based on that template from back  
14 in April, the one that he used for every business because he  
15 didn't know how to change the numbers because Teldrin Foster  
16 didn't work for the IRS.

17 On June 8, four days later, all of a sudden, the  
18 Yahoo account creates a new payroll spreadsheet where all the  
19 numbers were different. And you know why that is; you know  
20 that in that time period, around June 5, is when Darrell  
21 Thomas started talking to Gena Pyfrom-Foster directly. He  
22 needed her help to change the numbers because Teldrin Foster  
23 wasn't cutting it, he didn't know how to change the numbers,  
24 all the documents were identical.

25 That's where you start seeing this pattern where

1 Gena Pyfrom comes in. She fixes the documents. But Teldrin  
2 Foster is still the guy who is putting the finishing touches  
3 on these documents, stamping them so that they are ready to  
4 go to the banks to look like they are legitimate.

5 You saw that with Continuing Success. Teldrin  
6 Foster prepares the documents in May. Gena Pyfrom comes in  
7 in June and fixes the documents, creates payroll spreadsheets  
8 with numbers that aren't identical, and then Teldrin Foster  
9 stamps them.

10 And when there is a mistake on the document,  
11 Darrell Thomas contacts Teldrin Foster via WhatsApp, at a  
12 time when he was already talking to Gena Pyfrom.

13 If he wanted to reach her, he would WhatsApp her.  
14 But he went to Teldrin because Teldrin was the one that was  
15 finalizing the documents, stamping them, and making sure  
16 everything was right.

17 You saw with All Star Room and Board how Teldrin  
18 Foster helped Darrell Thomas fabricate a bank statement for  
19 All Star Room and Board.

20 Darrell Thomas sent him the fake Gaines Reservation  
21 and Travel bank statement. He sent him a bank statement for  
22 All Star Room and Board. And then Teldrin created that All  
23 Star Room and Board fake bank statement.

24 You saw Teldrin Foster send those identical  
25 Form 941s -- that's on the left there. On the right, you see

1 Gena Pyfrom-Foster come in and change the numbers because  
2 Teldrin Foster doesn't know how to change the numbers. And  
3 after she does that, we're back to the iCloud account,  
4 stamping that document.

5           You saw the same pattern with Infinite Education  
6 Services. Communications in the WhatsApp between Teldrin  
7 Foster and Darrell Thomas about that business, and then  
8 Teldrin Foster stamps those documents when they are ready.

9           ML Exotic Customs, again, Darrell Thomas asks  
10 Teldrin Foster what's the ETA on ML Customs? And shortly  
11 after that, Teldrin Foster sends him exactly what he asked  
12 for, ML Customs, ML Exotic Customs.

13           Same thing with Bellavie. You saw the business  
14 information going to Teldrin Foster via WhatsApp, and then  
15 you saw him prepare those documents and stamp them.

16           Advertising and Then Some is another example. You  
17 saw Teldrin Foster send the Form 941s with stamps on them.  
18 And remember, this is the one where the stamp was wrong  
19 because it was for a quarter that ended on December 31 of  
20 2019, but it was stamped as being received in October of  
21 2019, which is impossible.

22           And what did Darrell Thomas do? He went to Teldrin  
23 Foster and said, You have to put the 2020 stamp on this. And  
24 then Teldrin Foster did that.

25           Finally, you had Mickies Auto and Tire. This is

1 the only loan that is charged in the indictment, of all the  
2 ones you've heard, that's not referenced in the WhatsApp.  
3 And you saw that they had lots of conversations on the phone,  
4 you saw that they had lots of communications that are not  
5 written down. But this is the only one that is not in  
6 writing, and you saw that it followed the exact same pattern.

7 The Yahoo account, which was Gena Foster at the  
8 time, creates the documents and then the iCloud account  
9 stamps them.

10 Now you heard a lot in this trial about Gena  
11 Pyfrom-Foster. You heard that she did not know Darrell  
12 Thomas before the PPP loan fraud. She was married to Teldrin  
13 Foster. And you saw how she became involved because you saw  
14 the message where Teldrin Foster told Darrell Thomas "LOL. I  
15 think I have got her to do everything, the payroll, taxes,  
16 and find the loans."

17 And Darrell Thomas said, "Shit. That's what's up.  
18 We all about to eat good."

19 Teldrin Foster brought Gena Pyfrom into this to  
20 help with the PPP loan fraud. And you heard him say that, at  
21 the beginning, he just asked her to give him a template  
22 because he couldn't figure it out. It was too time  
23 consuming, he didn't know the formula, and Excel wouldn't  
24 give it to him. So he asked her to help.

25 (Audio was played.)

1 MS. CHAIKEN: You saw that after Gena Pyfrom gave  
2 Teldrin Foster the formula, gave him the template, he used it  
3 to create identical documents for each business.

4 And you know that that's what he did because he  
5 didn't know how to change the numbers, and he told you he  
6 didn't know how to change the numbers.

7 You saw how he sent the same spreadsheet, over and  
8 over and over again, with the same employees making the same  
9 exact amount of money for different companies because all he  
10 could do was take Gena's template and just change the name on  
11 it.

12 And you know that that was not Gena doing that  
13 because you saw what happened when Gena Pyfrom did actually  
14 start becoming involved again in June. She started creating  
15 different templates with numbers that changed because she  
16 knew how to change the numbers.

17 The defense has asked you to believe that Gena  
18 Pyfrom and Darrell Thomas framed Teldrin Foster. And when  
19 you are considering that defense, you should consider Judge  
20 Boulee's instruction that in considering the evidence you may  
21 use reasoning and common sense to make deductions and reach  
22 conclusions.

23 This is what the defense is asking you to believe:

24 They're asking you to believe that right when the  
25 PPP program was announced, Gena Pyfrom hacked into Teldrin

1 Foster's WhatsApp account hoping that maybe somebody he knows  
2 wants to commit PPP fraud and is going to text him about it,  
3 and then she can respond and they can start to work together  
4 on PPP fraud using Teldrin Foster's account.

5 That makes no sense at all.

6 They're asking you to believe that Darrell Thomas  
7 and Gena Pyfrom are so sophisticated that they figured out  
8 how to hack into Teldrin Foster's WhatsApp account, his  
9 Telegram account, his iCloud account and his Yahoo account  
10 without his knowledge, without him having any idea what they  
11 were doing.

12 And instead of using those accounts to commit the  
13 fraud and frame him, instead of creating fake email addresses  
14 that they could use to remove themselves from the situation,  
15 what they chose to do is email themselves, message  
16 themselves, refer to themselves in the messages, so that if  
17 anybody ever looked at the messages, they would know, not  
18 only that Teldrin Foster was involved in the PPP fraud, but  
19 that they were, too.

20 That makes no sense.

21 If Gena Pyfrom had access to Teldrin Foster's  
22 iCloud account and was trying to frame him, she would not  
23 have sent this email from her own email address to Darrell  
24 Thomas and to Teldrin Foster. She would have just created  
25 the document and then had it, instead of putting it out there

1 so that anybody looking at these emails would know that all  
2 three of them were involved in this.

3 If she had access to Teldrin Foster's WhatsApp  
4 account, she would not have sent a WhatsApp message that  
5 said, "LOL, I think I have got her to do everything."  
6 Because anybody reading that message would immediately be  
7 pointed in the direction of the one person in Teldrin  
8 Foster's life who would know how to do payroll and taxes, his  
9 wife, who works for the IRS.

10 They're asking you to believe that they framed  
11 themselves in order to frame Teldrin Foster. And that makes  
12 no sense.

13 They're also asking you to believe that all of  
14 these payments to Teldrin Foster were made as part of an  
15 attempt to frame him. They paid him -- Darrell Thomas paid  
16 him tens of thousands of dollars so that if anybody looked at  
17 the financial trail they would see money going to Teldrin  
18 Foster and assume he must have been involved.

19 And the idea that Darrell Thomas would pay  
20 something that he was framing is, again, ridiculous.

21 Teldrin Foster told you -- I'm sorry, the defense  
22 told you that these payments were for money that Darrell  
23 Thomas owed to Teldrin Foster for some retirement investment  
24 he made with Darrell Thomas.

25 But you saw Teldrin Foster's own words about what

1 this money was for. It was for him to collect his  
2 percentage, his percentage of the PPP money.

3 And finally, the defense is asking you to entirely  
4 ignore Mr. Foster's own confession. They just are asking you  
5 to assume that Darrell Thomas and Gena Pyfrom just got  
6 incredibly lucky that when the FBI went to talk to Teldrin  
7 Foster, he just started making up details that lined up  
8 exactly with what had happened, even though he knew nothing  
9 about anything that had happened.

10 Ms. Webster told you in her opening statement that  
11 you would hear how confused he was during the interview. But  
12 he wasn't confused. He gave detailed explanations of how he  
13 and Darrell Thomas worked together, how they got the forms,  
14 what they did with them, how they changed them.

15 The only thing that he was confused about was  
16 trying to figure out how to talk his way out of the hundreds  
17 of emails that he exchanged with Darrell Thomas. And you  
18 heard him say, over and over and over again, "It was just  
19 bullshit. I was just feeding him bullshit. It was just  
20 bullshit."

21 Yeah, it was bullshit. They were fake documents,  
22 but there was nothing he could say to explain why he was  
23 passing those documents to Darrell Thomas. That's the only  
24 thing he was confused about.

25 On the other hand, you have heard no evidence in

1 this case that there was any hacking of anything. You heard  
2 that we have Darrell Thomas's phone. There was no Teldrin  
3 Foster WhatsApp account on there. There was no Teldrin  
4 Foster Yahoo account on there. There was no Teldrin Foster  
5 iCloud account. There was no Teldrin Foster Telegram  
6 account. It was Darrell's things on Darrell's phone.

7           You heard that on Darrell Thomas's computer there  
8 was no evidence of hacking, no evidence of attempts to change  
9 passwords, no evidence that he had any of Teldrin Foster's  
10 passwords.

11           The defense told you in opening that you would hear  
12 evidence that the Teldrin23@iCloud.com account was on Darrell  
13 Thomas's computer. And you did not hear that evidence in  
14 this trial.

15           What you heard from their expert, Mr. Persinger, is  
16 that on May 22, 2020, in the span of a few seconds, there  
17 were three attempts to do something with the identity  
18 Teldren23@iCloud.com on an Adobe website.

19           There was not a single shred of evidence on that  
20 laptop that anybody had ever logged into an iCloud account  
21 and done anything on that account. No shred of evidence of  
22 that at all.

23           And you heard that the Yahoo was on Darrell  
24 Thomas's computer, and you heard that Teldrin Foster knew  
25 that because he put it there.

1 (Audio was played.)

2 MS. CHAIKEN: Teldrin Foster knew that Darrell  
3 Thomas had access to his Yahoo account. He put it on his  
4 computer because they were working together, and that's how  
5 they shared documents. He knew people had access to his  
6 Yahoo account.

7 He didn't change the password. He didn't try to --  
8 all he had to do was change the password. It would have come  
9 off of anywhere else that it was logged in. But he knew  
10 that's how it was being used.

11 The defense also had their expert testify that  
12 Apple Continuity is a product that exists.

13 But you didn't hear any evidence in this trial that  
14 anybody, anybody in the case had Apple Continuity, that it  
15 was somehow linked to Teldrin Foster's WhatsApp account, his  
16 Telegram account, his iCloud account, and that anybody ever  
17 used Apple Continuity to get into any of Teldrin Foster's  
18 accounts.

19 What the defense is asking you to believe is that  
20 Gena Pyfrom and Darrell Thomas had access to all of Teldrin  
21 Foster's accounts and they were able to use those accounts  
22 for months without him having any idea, and that what they  
23 decided to do with access to his accounts is to frame not  
24 only him but themselves.

25 That makes no sense.

1 I want to talk about a few other things that you  
2 heard from the defense that are not defenses, and  
3 Judge Boulee will not instruct you that they are defenses.

4 The first is that other people were involved. You  
5 heard a lot in this trial about Darrell Thomas and about Gena  
6 Pyfrom. And if Ms. Webster was prosecuting Darrell Thomas  
7 and Gena Pyfrom, she would have a great case against them for  
8 PPP fraud.

9 But this is not the trial of Darrell Thomas and  
10 this is not the trial of Gena Pyfrom. This is the trial of  
11 Teldrin Foster. And the only thing you need to decide is  
12 what Teldrin Foster's involvement was.

13 The fact that other people were also involved does  
14 not change his own involvement.

15 Another thing you heard a lot about was that there  
16 were people involved in this that Teldrin Foster did not  
17 communicate with. And again, that's not a defense. You  
18 don't have to have a scheme to defraud with every single  
19 person who was involved in the fraud.

20 Teldrin Foster had a scheme to defraud with Darrell  
21 Thomas. That was his role. His role was to create the  
22 documents and get the loans ready to be submitted.

23 The fact that other people are involved in that as  
24 well that he did not communicate with is not a defense.

25 You also heard that Darrell Thomas got a lot of the

1 money. He used it on things like cars and jewelry, and he  
2 got cash. You saw all of that. And you heard that Teldrin  
3 Foster was upset that he didn't get more, that he didn't get  
4 his fair share. You saw that that's why they fell out.

5 They ultimately fell out because Teldrin Foster  
6 felt like Darrell Thomas screwed him out of his share of the  
7 percent of the PPP fraud.

8 But the fact that the person you committed fraud  
9 with cheated you out of what you thought you deserved for the  
10 fraud is not a defense to committing fraud.

11 And finally, even if you believe that Teldrin  
12 Foster thought Darrell Thomas owed him money, the fact that  
13 you think someone owed you money does not give you the right  
14 to commit fraud with them to get that money back.

15 He said, "Well, I figured I might have a shot and  
16 then I could get my money back, and so I decided to help him  
17 with the fraud."

18 That's not a defense to the fraud.

19 The evidence shows that Teldrin Foster participated  
20 in a scheme to defraud with Darrell Thomas as to each of  
21 these loans, and that satisfies the first element.

22 The next element is that the false pretenses,  
23 representations, or promises have to be about a material  
24 fact. And that basically just means that it's an important  
25 fact.

1           And here, you know the fact was important because  
2           you saw the application. You heard from the SBA how the loan  
3           was calculated, and that the whole point of getting the loan  
4           was that it was based on how much payroll you had, about  
5           being an existing business, submitting real documents about  
6           your business and your payroll, and then getting a loan based  
7           on that information.

8           So all of the documents that were being created and  
9           the information that was being put in this application was  
10          clearly important because every lender told you, and the SBA  
11          told you, that if anything in the application was false, the  
12          loan would not have been approved.

13          That satisfies the second element.

14          The third element is that Mr. Foster acted with the  
15          intent to defraud. And you heard him say himself that they  
16          knew to get the money was fraud.

17          That's all you need to look to is his own words.  
18          He said, "We were fixing to steal from the government."

19          You also saw Teldrin Foster and Darrell Thomas  
20          discussing what information the banks want. He knew this was  
21          being submitted to banks. And obviously, Darrell Thomas and  
22          Teldrin Foster had no reason to be talking about these  
23          businesses and creating fake documents for them unless the  
24          purpose was to submit the documents to banks to get loans.

25          These were not just two guys who sit around just

1 practicing how to Photoshop documents. The reason they did  
2 this and the reason they put stamps on them were because they  
3 wanted it to look legit so that when it went to banks the  
4 loan would be approved.

5 And that proves the intent to defraud.

6 Finally, the last element is that there was an  
7 interstate wire involved in the offense. And again, I'll  
8 remind you here, Mr. Foster does not have to have personally  
9 transmitted an interstate wire.

10 You heard testimony in this trial that Darrell  
11 Thomas submitted all these applications from his home here in  
12 the Northern District of Georgia; that those applications  
13 then went to servers of lenders all over the country. And  
14 then from there, the data from the loan application was  
15 transmitted to the servers of the SBA in Virginia.

16 So there were interstate wires involved in the  
17 submission of each of these loans. That satisfies the last  
18 element. And you should find Mr. Foster guilty as to each  
19 and every wire fraud count.

20 As I said, Mr. Foster is also charged with bank  
21 fraud as to the loans that were issued by federally-insured  
22 banks.

23 And the elements here are essentially the same  
24 except that the victim is a federally-insured bank instead of  
25 just someone.

1           And so again, we have shown the evidence of the  
2 scheme to defraud, that the false or fraudulent pretenses  
3 were about a material fact, that there was an intent to  
4 defraud.

5           And you heard the testimony from Cross River Bank,  
6 Celtic Bank, and Customers Bank that they were federally  
7 insured in 2020, which satisfies the last element.

8           Now Mr. Foster is also charged with conspiracy to  
9 commit those crimes, and conspiracy to commit bank fraud and  
10 wire fraud. And what that means, basically, is that there is  
11 an agreement to commit those crimes between two or more  
12 people.

13           As to the first element, that there was an  
14 agreement to accomplish a common and unlawful plan,  
15 Judge Boulee will instruct you that the government does not  
16 have to prove that all the people named in the indictment  
17 were members of the plan, or that those who were made any  
18 kind of formal agreement.

19           And he will also instruct you that the heart of the  
20 conspiracy charge is the making of the unlawful plan itself.  
21 The government doesn't have to prove the plan succeeded.  
22 It's having the plan to do it that's the crime.

23           And as far as the law is concerned, it makes no  
24 difference whether evidence is direct or circumstantial. So  
25 here, of course, people are never go to get together and sit

1 with their lawyers and draft up a contract that says "we  
2 hereby agree to commit bank and wire fraud." You are never  
3 going to have direct evidence of that kind of agreement.

4           Instead, you have to look at circumstantial  
5 evidence of what people do, what people say, how people act.

6           And here you have seen the evidence that Darrell  
7 Thomas and Teldrin Foster were working together, talking  
8 every day, exchanging documents. And the only reason for  
9 them to be doing that was because they had an agreement to  
10 commit fraud as to each and every one of these PPP loans.

11           The second element is that Mr. Foster knew the  
12 unlawful purpose of the plan and willfully joined in it. And  
13 Judge Boulee will instruct you that a person can be a  
14 conspirator even if he doesn't know all the details of the  
15 unlawful plan or the names and identities of all the other  
16 alleged conspirators.

17           So again, it doesn't matter that he didn't talk to  
18 these other people. He knew they were there because he knew  
19 these businesses were coming from somewhere. But it doesn't  
20 matter.

21           What matters is whether he knew and he conspired  
22 with at least one person. And you saw that with Darrell  
23 Thomas.

24           Judge Boulee will also instruct you that if  
25 Mr. Foster played only a minor part in the plan but had a

1 general understanding of the unlawful purpose of it, and if  
2 he wilfully joined on at least one occasion, that's  
3 sufficient to find him guilty.

4 And you saw in this case how he joined these plans,  
5 over and over and over again. Every time he created a fake  
6 document, every time he talked to Darrell Thomas about these  
7 loans, every time he put a fake stamp on a document, he was  
8 joining the conspiracy to get a fraudulent PPP loan.

9 That satisfies both of the elements of conspiracy.  
10 And as to each of the conspiracy counts, you should find  
11 Mr. Foster guilty.

12 Finally, as I mentioned with respect to the  
13 federally-insured banks, Mr. Foster is charged with making  
14 false statements to a federally-insured financial  
15 institution. And these elements are covered by what we've  
16 already discussed:

17 There were false statements and reports in the  
18 documents that were submitted to these lenders, there was an  
19 intent to defraud or an intent to influence the action of the  
20 institution because the intent was, obviously, for the lender  
21 to issue a PPP loan based on the fake numbers and the fake  
22 documents that were submitted.

23 And again you heard that Cross River Bank, Celtic  
24 Bank, and Customers Bank were federally-insured.

25 Finally, Mr. Foster is charged with money

1 laundering. And I'm going to talk about the elements of  
2 money laundering in more detail when I talk about  
3 Ms. Jackson, but you'll hear that there are four elements:

4           The first is that the defendant knowingly  
5 conducted, or tried to conduct a financial transaction.

6           And again, I'll remind you, he doesn't have to have  
7 done it personally, as long as he intentionally joined with  
8 someone to do it. And you heard him say that this payment  
9 that went to Gena Pyfrom-Foster's account was actually a  
10 payment to him.

11           (Audio was played.)

12           MS. CHAIKEN: And you heard him say, later in the  
13 interview, that the reason it went into Gena's account is  
14 because his account got locked up, so Darrell Thomas was  
15 paying him through Gena's account. This is a financial  
16 transaction that he conducted, or tried to conduct, by  
17 joining with Gena to get this money.

18           The second element is that the defendant knew the  
19 money or property involved in the transaction came from some  
20 kind of unlawful activity.

21           And of course, he knew the money from Bellator came  
22 from unlawful activity because he himself helped Bellator get  
23 a fraudulent PPP loan.

24           The third element is that we have to prove the  
25 money actually did come from an unlawful activity. And we

1 have shown you the evidence that the Bellator Phront Group  
2 loan was fraudulent.

3 And finally, we have to show that the defendant  
4 knew the transaction was designed, in whole or in part, to  
5 conceal something about the transaction or about the money.

6 And here, you saw that it was a payment to Gena  
7 Pyfrom's account that was actually meant to be money for  
8 Teldrin Foster.

9 You saw that the payment was designated as being  
10 for payroll services and accounting, even though there were  
11 no payroll services and accounting. And you saw that what  
12 the money was actually for was payment for participation in  
13 fraud.

14 That satisfies the four elements of money  
15 laundering. You should find Teldrin Foster guilty as to each  
16 and every count he is charged with.

17 I'll move on to Carla Jackson. She is charged only  
18 with money laundering. She is not charged with participating  
19 in the underlying PPP loan fraud. I'll go through each of  
20 those elements again.

21 Again, the first element is that Ms. Jackson  
22 knowingly conducted, or tried to conduct, a financial  
23 transaction. You saw her deposit of this check. John Gaines  
24 told you that that's her handwriting. And you know that  
25 she's the only person who is an authorized signer on this

1 account. She's the only person who can make transactions in  
2 this account. And so you know that this check deposit was  
3 hers.

4 And I will note, by the way, that Judge Boulee will  
5 not instruct you that it matters what type of transaction the  
6 financial transaction is. You heard that the indictment  
7 says -- refers to this as a wire transfer. It's obviously a  
8 check. But you just need to find that she knowingly  
9 conducted, or tried to conduct, a financial transaction, not  
10 any specific type of transaction. So the fact that it's a  
11 check does not matter.

12 You saw that she also received a wire. These are  
13 the two deposits she received, and these are the two counts  
14 that she is charged with.

15 Now the second and third elements, I want to  
16 explain them again because there is a very important  
17 distinction here.

18 The third element is that we have to prove that the  
19 money or property actually came from a specified unlawful  
20 activity, which in this case is wire fraud. That means we  
21 have to prove that the source of the money came from a wire  
22 fraud.

23 In this case it's the PPP loan fraud, and we've  
24 talked about how that was a wire fraud. We don't have to  
25 prove, in the third element, that Ms. Jackson knew the

1 specific criminal activity that the money came from, or even  
2 that she knew it was a wire fraud. We just have to prove  
3 that it did, in fact, as a factual matter, come from a wire  
4 fraud.

5           The second element is the one that has to do with  
6 Ms. Jackson's knowledge. And the knowledge that she needs to  
7 have had is that the money was some kind of unlawful  
8 activity. She just needs to know it was illegal, but she  
9 doesn't need to know specifically what it was from or what  
10 the exact illegality was.

11           As far as the third element, you saw that the  
12 Gaines Reservation and Travel loan resulted -- or was a wire  
13 fraud. You saw the fake loan application, you saw the fake  
14 bank statements and the fake 941s.

15           You heard that Gaines Reservation and Travel has no  
16 business, and never did. And you heard that that loan  
17 application was submitted from here in the Northern District  
18 of Georgia, and then went to Cross River Bank and then to the  
19 SBA. And none of those servers were in the Northern District  
20 of Georgia.

21           So we have proven beyond a reasonable doubt that  
22 the money or property did come from a wire fraud.

23           So what that really leaves you to decide is the  
24 second and the fourth elements, about what Ms. Jackson knew,  
25 whether she knew that the money was from something illegal,

1 and whether she knew the transaction was designed to conceal  
2 or disguise the nature, location, source, ownership, or  
3 control of the proceeds.

4 And when you are considering what she knew, there  
5 is a very important instruction Judge Boulee is going to give  
6 you about proving knowledge. We can prove that Ms. Jackson  
7 actually knew both of these things, but Judge Boulee will  
8 also tell you that it's enough that the defendant was aware  
9 of a high probability the fact existed, unless she actually  
10 believed the fact didn't exist.

11 Basically, what that means is if you avoid learning  
12 something, that's the same as knowing it. And you can find  
13 knowledge if Ms. Jackson actually knew, or if you find that  
14 she had every reason to know but deliberately closed her eyes  
15 to avoid finding out.

16 You heard in this case that Ms. Jackson knew that  
17 John Gaines was working on PPP loans. She filled out her own  
18 PPP loan application for a business that you heard had no  
19 employees. John Gaines had her do that.

20 And he told you she knew he was working on PPP loan  
21 applications. So when, all of a sudden, \$300,000 fell out of  
22 the sky into Mr. Gaines's account during a national pandemic  
23 where people were laid off and businesses were shut down and  
24 the economy was ground to a halt, she knew that that money  
25 came from the PPP program.

1           Mr. Gaines admitted to you, she's the one who  
2 filled out this PPP application. You saw the signature on  
3 it, you saw that it matches everything else that she has  
4 signed that you have seen in this case.

5           You also know that she knew that the money came  
6 from something illegal because you heard her tell lie after  
7 lie after lie about what the money was for. And there is  
8 nothing illegal about getting money from your ex-husband and  
9 moving it into your account. There is nothing illegal about  
10 moving money between people if that money is not from an  
11 illegal source.

12           The only reason to lie about what the money was for  
13 is if you know it's not supposed to be there.

14           (Audio was played.)

15           MS. CHAIKEN: You heard her say that she got more  
16 than \$335,000 into her account because there was going to be  
17 some unspecified project that she had employees for, but she  
18 didn't know who they were, and she didn't know how many,  
19 because there actually wasn't a project that had even been  
20 discussed.

21           And you heard from John Gaines and you know that  
22 there was no project. There was a trip to Alabama where he  
23 took a picture of a street sign and said that he had big  
24 plans to do a construction project.

25           You also heard that Ms. Jackson lied about who the

1 money was from and pretended it was an arm's length  
2 transaction. And as you listen to this next clip, I just ask  
3 you to keep in mind the testimony you heard from John Gaines  
4 yesterday, about how he's the one who gave her the money,  
5 he's the one who talked to her about the project. And listen  
6 to what she said, now thinking of that testimony in mind,  
7 about where she got this money.

8 (Audio was played.)

9 MS. CHAIKEN: That was a painfully, painfully long  
10 two minutes where Ms. Jackson struggled to figure out what  
11 she was supposed to say about where the money came from.  
12 This was only weeks after she had received the transactions.  
13 This is July of 2020.

14 And the only reason not to say "these were checks  
15 my ex-husband gave me to put in my account for some project  
16 he's doing" is because she knew that that was illegal. She  
17 knew the money was not supposed to be there. She knew that  
18 was not what the money was for.

19 Otherwise, there would have been no reason for her  
20 to just say -- no reason for her to not just say "oh, my  
21 ex-husband gave me these checks and asked me to put them in  
22 the account." She knew that the money came from an illegal  
23 source.

24 And speaking of painfully long, I want to talk  
25 about John Gaines, because John Gaines was who Ms. Jackson

1 wanted you to hear from. He was her star witness.

2 And asking him questions was like pulling teeth.  
3 He would not admit to anything unless I showed him a document  
4 that showed it.

5 He claimed he couldn't remember things that  
6 happened two weeks ago on what was probably one of the most  
7 important moments of his life, when he pleaded guilty to  
8 committing a federal crime.

9 And although it took a long time, you eventually  
10 heard about his long history of fraud. And his testimony  
11 showed that he is hopelessly untrustworthy. But there are a  
12 few things he couldn't deny. He admitted that Ms. Jackson  
13 knew that he was doing PPP loans during that time period.

14 He admitted that Gaines Reservation had never had  
15 any business, had never done business with Management  
16 Resource Services. And Management Resource Services didn't  
17 have any employees, either.

18 He told you that when \$335,000 fell out of the sky  
19 into Gaines Reservation and Travel's account, she didn't ask  
20 him a single question about where he, all of a sudden, got  
21 money when people were struggling to put food on the table  
22 during a pandemic. And she didn't ask him because she knew.  
23 She knew that it was PPP money.

24 John Gaines sat on this witness stand and he told  
25 you that he and Ms. Jackson were business partners and that

1 they were going in on a project together in Montgomery,  
2 Alabama, a place he had been to with someone he can't even  
3 remember, to scope out a business project. Where he took a  
4 couple of pictures of street signs and numbers on a building.

5 But what his testimony showed is that the only  
6 thing John Gaines and Carla Jackson were partners in was  
7 money laundering.

8 Finally, you saw evidence that Ms. Jackson knew the  
9 transaction was designed, in whole or in part, to conceal or  
10 disguise the nature, location, source, ownership, or control  
11 of the proceeds.

12 You saw the payments themselves and what they said  
13 they were for: Consulting fees, daily business management  
14 and payroll.

15 And you know that that's not what the payments were  
16 for because you know that there was no business to consult.  
17 There was no business to manage daily. There was no payroll.  
18 That's just what it needed to look like.

19 You saw all of the transactions that Ms. Jackson  
20 made. You saw that, on June 8, the money came into her  
21 account. She deposited the check for \$155,252.50 for  
22 consulting fees and daily business management. And you saw  
23 the text messages that John Gaines sent her on June 18,  
24 telling her to make payments to pay off his auto loans.

25 And you saw she didn't respond, she didn't say, "I

1 thought this was supposed to be for consulting fees. I  
2 thought this was for a project we're doing."

3 He told you she did not say anything. She did not  
4 ask him any questions. And that's because she knew that the  
5 money was never for consulting and it was never for daily  
6 business management. It was a place for John Gaines to hide  
7 the PPP loan proceeds.

8 And there is one other very important thing about  
9 the timing here. Even if you believe that, on June 8 of  
10 2020, Ms. Jackson somehow thought this was really for a  
11 project, if you believe everything the defense wants you to  
12 believe, she really thought that she was going to consult and  
13 do daily business management on some project in Montgomery,  
14 Alabama, on June 18, 2020, she found out that was not true  
15 because John Gaines asked her to use that money to pay off  
16 his auto loans.

17 So by June 18 of 2020, she knew that money was not  
18 for a project. It was just money John Gaines couldn't keep  
19 in his own account, in the Gaines Reservation and Travel  
20 account.

21 So on June 22, when he asked her for her bank  
22 account information so that he could send a wire, by that  
23 point she knew full well that this was money from an illegal  
24 source and that John Gaines wanted to hide it in her account.

25 And finally, ladies and gentlemen, again, you don't

1 need to look beyond Ms. Jackson's own words to know that she  
2 knew the money was from the Paycheck Protection Program and  
3 she knew that it was going into her account to conceal that  
4 money because when she was asked what that money was for,  
5 this is what she said.

6 (Audio was played.)

7 MS. CHAIKEN: Of all the things Ms. Jackson could  
8 have said that money was for -- to purchase real estate, to  
9 purchase equipment, to purchase construction materials, to  
10 purchase products they needed -- of all the things the money  
11 could have been for for this project, the one thing that she  
12 chose to say it was for was payroll. And that's because she  
13 knew that payroll is the one primary approved expense under  
14 the Paycheck Protection Program.

15 When you get back to the jury room, I ask you to  
16 look at the exhibits, the long paper trail that the  
17 defendants left. I ask you to listen to their own words, the  
18 recordings of their interviews.

19 And I ask you to use your common sense, and return  
20 the only verdict that is supported by the evidence and by the  
21 law, and that is a verdict of guilty on all counts.

22 Thank you.

23 Your Honor, I reserve the rest of my time for  
24 rebuttal.

25 THE COURT: All right. Thank you.

1 All right. Did you say you needed a couple minutes  
2 to get your audio visual connected and ready?

3 MS. WEBSTER: Yes.

4 THE COURT: Why don't we take a very short break,  
5 so not a 10-minuter, but maybe more like a 5-minuter?

6 Thanks everyone.

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

8 (Court recessed at 10:53 a.m., and proceedings  
9 continued as follows at 11:07 a.m.):

10 (Jury enters the courtroom at 11:07 a.m.)

11 THE COURT: You all can be seated.

12 Ms. Webster, go ahead.

13 MS. WEBSTER: Thank you, Your Honor.

14 DEFENDANT FOSTER'S CLOSING ARGUMENT

15 MS. WEBSTER: I told you in opening, that we were  
16 going to try to bring you the rest of the story.

17 Now, the story from the government's perspective is  
18 simple, but the reality is way more complicated, and that has  
19 borne out time and time again. And I hope you have seen it  
20 throughout this trial.

21 Let's start with the money laundering count,  
22 Count 59 of the indictment.

23 To find Mr. Foster guilty on Count 59, you have to  
24 find that he's guilty of concealment money laundering. And  
25 that means that the government has to prove beyond a

1 reasonable doubt that Teldrin Foster had the intent of making  
2 this transaction for the purpose of concealing the source of  
3 the funds.

4 Now, they're going to say that he did not have to  
5 be the one that made that transaction, that he can be guilty  
6 if he aided and abetted in making that transaction.

7 But to be guilty of aiding and abetting a  
8 transaction or a crime, you have to intentionally join with  
9 the person who commits the crime. And the Judge will tell  
10 you that knowledge that a crime was being committed is not  
11 enough. You must have involved yourself in it in some way.

12 Finding that a defendant is criminally responsible  
13 for the acts of another person requires proof that the  
14 defendant intentionally associated with or participated in  
15 the crime, not just that the defendant was simply present at  
16 the scene of the crime or knew about it.

17 So Mr. Foster had to have the intent to bring this  
18 deposit about. And the government has not presented a single  
19 shred of evidence that he knew about it before it happened.

20 The government established that there was a deposit  
21 of \$10,560 on June 11 of 2020, and that money went into the  
22 Pyfrom Exclusive Consulting account. They also established  
23 that, at some point in December of 2020, Teldrin Foster said  
24 at some point, "I had access to that money."

25 But we had to show you the rest of the story. We

1 had to show you that, first, Gena Pyfrom-Foster set up her  
2 own personal Bank of America account on May 15 of 2020. And  
3 then we had to show you that, on June 10 of 2020, Gena  
4 Pyfrom-Foster went into Bank of America to set up this Pyfrom  
5 Exclusive Consulting account for the purpose of obtaining  
6 payments for Darrell Thomas.

7 And we had to show you that Gena Pyfrom-Foster  
8 communicated with Darrell Thomas about that account and that  
9 she sent Darrell Thomas the information for the account that  
10 she had set up.

11 And this is that photo that she sent to Darrell  
12 Thomas in their WhatsApp messages.

13 And then we had to show you that on the following  
14 day, Darrell Thomas sent Gena the deposit slip showing that  
15 the deposit had been made. And we had to show you where the  
16 money went, that the money did not go to Teldrin Foster.

17 We had to show you that Darrell Thomas gave Gena  
18 money on other occasions, that there was cash that was given  
19 to Gena Pyfrom-Foster. And there are pictures of that.

20 If we can go to the next slide -- yes.

21 And then that there are also Zelle transfers that  
22 were also sent directly to Gena Pyfrom-Foster. This shows  
23 the \$3,000 and the \$7,000 deposits that went to Gena  
24 Pyfrom-Foster.

25 And we had to ask the questions: Was there any

1 evidence that Teldrin Foster knew that this transaction was  
2 happening?

3 And what was the answer? No. There were no  
4 communications between Teldrin Foster and Gena or Darrell  
5 about this transaction. There were no communications between  
6 Darrell and Gena where they said, hey, make sure that Teldrin  
7 gets this money, or, okay, I'll make sure that I give this  
8 money to Teldrin.

9 That never happened. There are no communications.  
10 There is no evidence showing that this money was intended for  
11 Teldrin Foster.

12 Now the government will say, well -- and has  
13 said -- that he admitted to it in his statement. But the  
14 evidence does not show that he knew about it in advance. In  
15 fact, it clearly shows the opposite, that he was not  
16 involved.

17 And you cannot intentionally join in with something  
18 that you do not know is happening. But beyond that, they  
19 haven't proven that anyone had the intent to conceal the  
20 source of the funds.

21 So they haven't even proven that the people who  
22 actually made the transaction had the intent to conceal the  
23 source of the funds.

24 So Mr. Foster cannot be guilty of Count 59.

25 Now, turning to the conspiracy and fraud charges.

1 The government presented evidence of a few people that were  
2 involved in this case: Teldrin Foster, Darrell Thomas, Gena  
3 Pyfrom-Foster, Carla Jackson. But we're the ones who had to  
4 tell you about everyone else that was charged in the  
5 indictment.

6 This is from the indictment that you will have a  
7 copy of. And you will see all these names in the left-hand  
8 column are people that Teldrin Foster was supposed to have  
9 conspired with.

10 So we're the ones who had to tell you that these  
11 people existed, and we're the ones who had to tell you what  
12 roles they played in these conspiracies. These are the names  
13 of the people that the government says that Mr. Foster  
14 conspired with.

15 Does he have a separate agreement with each of  
16 these people? The government just stood up and said that he  
17 had one conspiracy with Darrell Thomas, but -- so why is he  
18 charged in 14 different conspiracy counts? If the government  
19 is saying that there is only one conspiracy with Darrell  
20 Thomas, that is not what is charged in this indictment and  
21 you cannot find him guilty of these charges.

22 The government said that they have to prove that  
23 there was a specific action for each conspiracy. And the  
24 Judge will tell you that you have to consider each count  
25 separately, the evidence for each count separately, and the

1 evidence for each defendant separately.

2           So the fact that you may think, well, he may have  
3 made an agreement as to one count does not mean that he's  
4 guilty as to every count.

5           The only alleged co-conspirators that you've heard  
6 from in this case are people that the defendants called. You  
7 heard briefly from Ricky Dixon, and you heard from John  
8 Gaines because Ms. Jackson called him. And despite what the  
9 government calls his painfully long testimony, they didn't  
10 ask him if he knew Mr. Foster.

11           They could have brought you other people to  
12 testify. They could have brought Darrell Thomas. And if  
13 they are so confident that Darrell Thomas would have said  
14 that he was conspiring with Teldrin Foster, where is he?  
15 Where is he?

16           They could have brought Gena Pyfrom-Foster in. If  
17 they're so confident that Teldrin Foster was the one using  
18 his WhatsApp messages and no one else had access to his  
19 devices, why would you not bring him in? They didn't bring  
20 him. And you have to ask yourself why.

21           Why would they not bring someone in to testify  
22 against him? Why would they not bring someone in to actually  
23 put him behind the keyboard of those emails that were sent?  
24 Why would you not bring someone who could actually put him  
25 behind the phone of those WhatsApp messages? They want you

1 to rely on the fact that they were sent, but we think you  
2 should demand more.

3 Now turning to the rapid! PayCards, the government  
4 told you that Darrell Thomas and Bellator issued  
5 rapid! PayCards and that Teldrin Foster had one, therefore,  
6 he must have had that card. But we had to tell you the rest.

7 We had to tell you that there are actually 198 of  
8 these rapid! PayCards issued. And we had to tell you that  
9 they were issued in all sorts of people's names, people that  
10 never actually had a rapid! PayCard.

11 And we're the ones who had to tell you that Darrell  
12 Thomas had at least nine in his possession at the time of his  
13 arrest.

14 Now, they brought in Agent Berni to testify, but  
15 we're the ones who had to ask him, could these call records  
16 be associated with calls from your watch or your tablet? And  
17 Jim Persinger had to tell you that they could.

18 We had to demonstrate to you that Agent Berni had  
19 plotted points that were based on what are called  
20 reconciliation transactions. Right? Reconciliation  
21 transactions that do not establish the actual time when those  
22 transactions happened.

23 And the government and Agent Berni did not realize  
24 that the report incorrectly mapped those transactions until  
25 later. But they still used that report to bring to you, to

1 try to convince you that they could establish where  
2 Mr. Foster's phone was.

3 They sort of tried to breeze past it, but these are  
4 problems in their case that they put in front of you.

5 Now let's talk about the emails. The government  
6 told you that Mr. Foster sent these emails, and therefore he  
7 must be guilty. That those emails were sent, and he's the  
8 one who had to have sent them.

9 But we're the ones who had to tell you about  
10 Darrell Thomas's laptop. Darrell Thomas's laptop that was  
11 found with a receipt with his trip to Las Vegas. Right?  
12 Don't let them fool you into thinking that Teldrin Foster was  
13 using that laptop.

14 It literally had a receipt from Darrell Thomas's  
15 trip. There is no evidence that Teldrin Foster was in Vegas  
16 with him.

17 So we had to tell you that the laptop had Teldrin  
18 Foster's Yahoo email address logged in. And there is  
19 actually a link, if you look in the top picture, there is an  
20 LNK file that shows you that was a link to his account on the  
21 laptop.

22 And I believe in the government's closing they  
23 played a statement where Mr. Foster indicated that his email  
24 address might have been logged in on the desktop. That is  
25 not a desktop. That is a laptop computer. You can see it

1 with your own eyes.

2 Now we had to show you at least in May of 2020,  
3 that Mr. Foster's email address was logged in to this laptop,  
4 and that in June 2020 this laptop was used. And it was used  
5 to log into his Yahoo account over and over and over again.

6 If this email was being used on Darrell Thomas's  
7 device, the government's entire theory that Gena was the one  
8 accessing his Yahoo account and sending all those emails  
9 doesn't even make sense.

10 We had to show you that whoever was using this  
11 laptop was actively going into Yahoo and downloading files  
12 from the emails. And we had to show you that whoever was in  
13 the Yahoo account was actively working with this fake  
14 Bellator statement. That's what Jim Persinger came in and  
15 told you.

16 And we had to show you that someone was logging  
17 into something with the Teldrin23@iCloud.com email account.  
18 Now, the government wants to tell you, okay, fine, maybe  
19 somebody else had access to that Yahoo account, but there is  
20 this pattern that Gena used the Yahoo email address in order  
21 to send the non-stamped versions of the 941s, but then the  
22 iCloud came next and was used to send the stamped versions of  
23 those, so Teldrin Foster must have sent the iCloud account  
24 emails.

25 So let's walk through that a little bit.

1 In the next slide we see an email from  
2 Teldrin23@iCloud.com and it's referencing the Impact  
3 Creations 941s. Here is a non-stamped version. Right? This  
4 is not stamped.

5 But then on the next slide you will see that there  
6 is a stamped one.

7 And on the next email, there is another stamped one  
8 from Impact Creations. And then in the next email, you will  
9 see another email from the iCloud account, sending documents  
10 about Lee Operations. And you will see again there is a 941  
11 that's not stamped, and then you will see one that is  
12 stamped.

13 And then, in the next email, you see another email  
14 from Teldrin23@iCloud.com, and then you see, what? A  
15 not-stamped 941, and then you see some that are stamped.

16 And this repeats a pattern. Here's another one.  
17 The Teldrin23@iCloud.com account, a non-stamped version, and  
18 then a stamped version.

19 Now, the government is going to say, well, those  
20 emails are from May 2020 and Gena Pyfrom-Foster wasn't  
21 involved at that time. But their so-called pattern doesn't  
22 even line up for the period in which they have to admit that  
23 Gena was involved.

24 We had to admit the WhatsApp messages from Gena  
25 Pyfrom-Foster that showed when these messages were sent. For

1 example, on June 23, on the left, you will see that Gena  
2 Pyfrom-Foster is saying "I just sent the Richlands 941  
3 payroll reports and 940 for 2019." That was sent at 10:29.  
4 And then you see the email account at 10:23, saying "here are  
5 the documents."

6 And then the next slide, something similar. She  
7 says, "Hey, I just sent Metadore and Linda's Hair," and then  
8 you see the emails several minutes prior.

9 And then we have an email that says, "Okay, about  
10 to send you Securus." And then, a little while later, we  
11 have the email with all the documents from Securus.

12 But the next one is the one that the government  
13 doesn't want you to think about because this disrupts the  
14 pattern.

15 At 10:42, Gena says, "I'm about to send you the  
16 email ones I did today." So remember that says "ones,"  
17 plural. Okay?

18 Then eight minutes later, at 11:00, there is an  
19 email from, what? The Teldrin23@iCloud account with these  
20 documents. And then, seven minutes after that, another email  
21 from, what? The Teldrin23@iCloud.com account.

22 So this pattern that the government is telling you  
23 doesn't even hold up when you look at the emails. And we are  
24 asking you to look past what you are being told, to see what  
25 you can verify with your own eyes.

1           Now let's talk about the pattern one more time.  
2     The government has said this is the pattern, this is what  
3     happened: Gena sent the emails from Yahoo, then Teldrin  
4     sends Darrell the stamped versions and then Darrell uses  
5     them.

6           But this only makes sense, this pattern only works  
7     if there is this middle thing, this middle step where Darrell  
8     sends the documents to Teldrin for the stamps. And where do  
9     we have that?

10           We haven't seen emails, right, where Darrell is  
11     saying, "Here is all the non-stamped versions. Please stamp  
12     them."

13           We haven't seen WhatsApp messages sending all the  
14     things that Gena made for Teldrin to stamp. That leaves a  
15     huge missing link in the government's case. And the  
16     government obtained the search warrant for all of Darrell's  
17     emails accounts and we have his phone. Right? And they come  
18     here to prove their case against Teldrin Foster, but where is  
19     this? Why don't we have it?

20           So their alleged pattern is not supported by the  
21     evidence.

22           Now let's talk to you about Gena and Teldrin's  
23     relationship. From the government's perspective, they are  
24     married. Right? They must live together, they must be  
25     working together. But we had to tell you the rest of that

1 story, too.

2 Teldrin and Gena may be married in form, but they  
3 are not married in the sense that they have a marriage, a  
4 relationship. And if not all marriages are created equal,  
5 then this one is on the no-good/bad side of that scale. And  
6 it especially is not great after Teldrin found out that Gena  
7 was working with Darrell behind his back.

8 And I know that some of you may disapprove, you may  
9 think if you are married, you shouldn't be in relationships  
10 with other people, and we understand that. But despite that,  
11 we brought Jennifer Murray in to testify, to show you two  
12 things.

13 First, that Teldrin Foster and Gena Pyfrom-Foster,  
14 they're not a team. They're not a pair. They do not work  
15 together. This is not your typical marriage.

16 But the second point is to address the WhatsApp  
17 messages. Because Jennifer Murray told you that Gena knows  
18 how to get into Teldrin Foster's phone, especially during  
19 this time period.

20 She told you that Gena would send the codes to the  
21 phone at least twice a year, between 2020 to 2022. So that  
22 idea that no one else has access to Teldrin's phones or his  
23 devices is not true.

24 And remember that the apps that the government has  
25 relied on, WhatsApp and Telegram, they are apps. They're not

1 your text messages. So they are not the things that are  
2 connected directly with your phone.

3 So again, we're asking you to look beyond what you  
4 may have heard and listen to the evidence that we have also  
5 presented. And while the government may not like that  
6 Teldrin Foster is not the sole person with control over his  
7 phone or control over his email addresses, it does not mean  
8 that it's not true. And we proved that to you.

9 Now the government wants you to think that Gena and  
10 Darrell started communicating in June of 2020. And we're the  
11 ones who had to tell you, wait, that's not true. Because you  
12 can see that they actually began communicating directly way  
13 back in, when? April of 2020.

14 This email was sent on April 8 of 2020. And you  
15 can see that Gena is communicating directly with Darrell  
16 Thomas.

17 And let me be clear that, even if Teldrin Foster  
18 introduced Gena to Darrell Thomas, he is not therefore  
19 responsible for every single action that they took together.

20 And on that slide, that previous slide that I was  
21 showing you, look at what they are talking about. Are they  
22 talking about PPP fraud? They are talking about taxes. They  
23 are talking about an 1120, which we know is a tax form. And  
24 this is what Teldrin Foster knew about.

25 But then, on the next slide, you will see that

1 Darrell Thomas sent Gena Pyfrom-Foster the, what? A PPP  
2 application on April 9 of 2020. And on the next slide we can  
3 see what it is, which is a PPP application for Bellator  
4 Phront Group.

5 So the idea that Darrell and Gena did not begin  
6 communicating until June of 2020 is just not true.

7 We want you to listen to Gena's own words. Okay?  
8 When she wanted to be paid for her work, she sent this list  
9 of her completed consulting contracts. And on this list are  
10 9, I believe, of the 14 loans charged in the indictment. And  
11 Agent Stites told you there is no legitimate consulting work  
12 going on here. Right? It was all illegal.

13 So the government again says she wasn't involved  
14 until June, but we know that she was involved much earlier  
15 because the first loan on this list is the Bellator Phront  
16 Group. Right? So we know that she was involved earlier.

17 And for the other ones that are not listed on this  
18 list. Right? As the government has described them, they are  
19 clones. They are the exact same. It does not take work to  
20 repeat those. So anyone could have done that, and it does  
21 not have to be Teldrin Foster.

22 But let's talk about Teldrin's statement. The  
23 government wants you to think, well, he said he Googled PPP  
24 information when the PPP loans were all over the news and  
25 that he discussed it with Darrell, and therefore he must be

1 involved.

2 But as we know, just because someone says something  
3 in an interview with law enforcement does not make it true.  
4 So let's think about the rest of the story as it relates to  
5 his statement.

6 To fully understand what was going on during that  
7 interview, you have to think about what Teldrin Foster knew  
8 at the time, not what we all know now, but what he knew back  
9 in December of 2020. So what did he know on that date?

10 He knew that the FBI had interviewed Gena  
11 Pyfrom-Foster. He knew that Darrell Thomas had been arrested  
12 and indicted. Agent Stites told you about how there was a  
13 press release and news articles about Darrell Thomas's arrest  
14 and indictment.

15 And he knew that, before this, he had received  
16 money from Darrell Thomas, money that he absolutely told the  
17 FBI about and money that was owed to him after Darrell had  
18 cheated him out of his legitimate money.

19 And to be clear, Teldrin Foster said, "yes, I got  
20 about a \$30,000 check that I deposited into a Navy Federal  
21 account." And that -- government went and got that account.  
22 That is the only bank account that they ever even tried to  
23 get.

24 Now, what did he not know on December 10 of 2020?  
25 Well, he didn't know about his right to have a lawyer. I

1 promise that.

2 And he did not know that Darrell and Gena had been  
3 communicating behind his back. He didn't know about all  
4 their messages. He didn't know what they had been doing.

5 And he didn't know about the emails from his  
6 account. And again, you can tell when he was asked about  
7 them. "I sent these emails?"

8 But what did the agents not know at the time of the  
9 interview? They also did not know about Gena's  
10 communications with Darrell. But even before that, even  
11 before they had evidence of Gena's involvement, they were  
12 super skeptical that it was Teldrin Foster. They were super  
13 skeptical that he was the one who could have provided any  
14 value to this scheme.

15 You heard the agents telling him, "What value do  
16 you bring? Why would they need you?" And the answer -- no  
17 one needed him. Right?

18 Who did they need? They needed Gena, the IRS  
19 employee. Gena, the spreadsheet wizard; right? Gena, whose  
20 metadata was on that entire stack of exhibits that I admitted  
21 yesterday.

22 The sort of ironic part about the whole thing is  
23 they had it absolutely right when they interviewed him. It  
24 was Gena, the IRS employee, who knew about the stamps. It  
25 was Gena, the IRS employee, who knew what an 1120 and a 941

1 was.

2 Now, they just showed you a WhatsApp message that's  
3 purportedly from Teldrin Foster saying, "I'm thinking they  
4 need to be stamped." Right?

5 Who would know this other than the IRS employee?  
6 Why would that be coming from Teldrin Foster?

7 So the sort of ironic thing about it is that they  
8 presented evidence that the stamps aren't even necessary,  
9 that the business owners would have never had access to the  
10 documents that had the stamps on it.

11 But this whole idea, right, came from an IRS  
12 employee because an IRS employee is the only one who would  
13 have known this.

14 So they want you to think that the fact that Gena  
15 Pyfrom-Foster was involved from the get-go was ludicrous, but  
16 it wasn't ludicrous when they interviewed him in December  
17 2020 and it's not ludicrous now.

18 Let me go back to the June 2020 deposit that's the  
19 subject of Count 59 for a minute. When they interviewed  
20 Teldrin Foster, they didn't know that Gena had communicated  
21 with Darrell about it. Right? They didn't have those  
22 WhatsApp messages at the time. And they didn't know that  
23 Gena had sent that information to Darrell, or that Darrell  
24 had sent that deposit slip back to her.

25 At the time of the statement and at the time

1 Mr. Foster was indicted, no one knew about that. But even  
2 after they obtained those messages, and even after they know  
3 who was communicating about them, they haven't backtracked at  
4 all. They haven't said, well, wait, we were wrong about  
5 that, maybe we should reconsider.

6 So I just want you to think about their  
7 unwillingness to change their mind and what that says about  
8 this case when they are confronted with contradictory  
9 evidence.

10 The government also wants you to look past all the  
11 work that could have went into getting to the end of that  
12 statement. They want you to ignore that the agents showed  
13 him all the emails, and again he says "I sent these emails?"

14 And then later, when they showed him again, "Well,  
15 I must have sent the emails because they came from my email."  
16 Well, that doesn't mean that he admits that he was sending  
17 them.

18 We knew that Bellator was Darrell's company and  
19 there were talks about loans, but that doesn't mean that he  
20 was admitting to the PPP fraud.

21 They want you to ignore that he was talking about  
22 the forms or that they were talking to him about the forms  
23 before he started describing them. And they said, this is  
24 what these things are. And they want you to ignore so much  
25 of what he actually said.

1           Think about this. The saying, "Oh, you can Google  
2 that; you can Google anything; just Google it," actually  
3 sounds like someone who knows what's going on. Saying, "Oh,  
4 you can Google that," or "someone who moves on money can get  
5 me this," does it sound like someone who actually did it or  
6 does it sound like someone who is speculating, who is trying  
7 to cover for something?

8           And they want you to ignore the fact that he  
9 provided details about this scheme that were completely  
10 wrong. Right? There was no plan to sell these forms to  
11 other business owners.

12           There was no plan to get a real warehouse or hire  
13 employees to do real projects. There was none of that. But  
14 that's what he told the government about.

15           So they want you to ignore what he said. They want  
16 you to ignore that he said that he never knew that Darrell  
17 had received any PPP funds, that he did not know that any of  
18 them had been approved or submitted. And again, we had to  
19 show you the rest of it.

20           They would have had you believe that Teldrin  
21 Foster, when he was admitting to receiving money, that he was  
22 receiving money for his participation in the PPP fraud. But  
23 he said, the whole time, that he had been hustled by Darrell  
24 Thomas and a guy named David out of his legitimate retirement  
25 money and he was trying to get his money back.

1           So go back and listen to the statements if you have  
2 any questions about it. And don't forget to listen to the  
3 clips that we were also able to add that complete the story  
4 that the government is telling.

5           Speaking of money, let's talk about the flow of  
6 money in this case. When the money came in, it went to  
7 Bellator or Elite Executive. Right?

8           Teldrin Foster was not involved and had no  
9 affiliation with these companies and no access to this money.  
10 But more than that, the government wants you to think that  
11 Teldrin Foster was a willing participant for every single  
12 loan that was charged in this indictment.

13           And you heard the agents sort of wondering aloud,  
14 "Did Darrell Thomas receive over \$10 million? I don't think  
15 so, I think it was less than that." But that's how much  
16 money we're talking about in this case. Right?

17           And you think the person who conspired with him on  
18 each and every single one of those loans did it for \$34,000?  
19 Even if you talked about the other much smaller payments, it  
20 doesn't get to anything close to the amount of money that was  
21 received in this case.

22           And the idea that Teldrin Foster was involved in  
23 all of those loans and he got this much money, I think, is  
24 more than sufficient to create reasonable doubt here.

25           And I want you to compare what we saw that money

1 with what we see at Darrell Thomas's house. The jewelry, the  
2 cars, the rapid! PayCards, this cash. Did you see anything  
3 like that from Teldrin Foster? No. We have nothing like  
4 that.

5 What is reasonable doubt? That's the standard that  
6 the government has to meet. Right? They have to prove every  
7 element of this beyond a reasonable doubt.

8 Now, reasonable doubt is a real doubt. It's based  
9 on your reason and common sense after you have considered all  
10 of the evidence in the case. But the government's proof has  
11 to be so convincing that you would be willing to rely on it  
12 for your most important decisions -- not the easy decisions,  
13 the decisions that don't have consequences -- but the  
14 important ones like what would you do for you kids. Would  
15 you buy a house based on this level of confidence or this  
16 level of evidence?

17 And this shows you, this chart shows you what proof  
18 beyond a reasonable doubt means. This is a higher standard  
19 than is required to take away your kids from your custody,  
20 which only requires a level of clear and convincing evidence.

21 Proof beyond a reasonable doubt is the highest  
22 level of proof we have in the legal system. If you're  
23 thinking, well, he must be involved somehow, that's not proof  
24 beyond a reasonable doubt. That is a hunch. If you are  
25 thinking he must have done something, even if it's not

1 exactly what the government has argued, that's not enough.  
2 You cannot convict someone because they probably knew  
3 something.

4           The judge will tell you that for the aiding and  
5 abetting counts, you must find beyond a reasonable doubt that  
6 Mr. Foster was a willful participant and not a knowing  
7 spectator.

8           And as to the conspiracy counts, the judge will  
9 tell you that simply being present or merely associating with  
10 certain people and discussing common goals and interests  
11 doesn't establish proof of a conspiracy.

12           A person who doesn't know about a conspiracy but  
13 happens to act in a way that advances some purpose of it does  
14 not automatically become a co-conspirator.

15           Now I know there is a lot of paper that has been  
16 admitted in this case, and you are going to have it back in  
17 the jury room with you. But this is not a question about who  
18 submitted more paper, who admitted more exhibits or anything  
19 like that.

20           It's not about whether we proved something more  
21 than what the government proved. The government always has  
22 the burden of proof in this case.

23           While we did admit evidence in the case, it was to  
24 show you that there is significant doubt about their claims  
25 against Mr. Foster.

1           As Mr. Foster sits here, he is presumed innocent.  
2       There is a cloak of innocence around him. And it's only if  
3       the government establishes beyond a reasonable doubt every  
4       single element of every single crime that he can be  
5       convicted.

6           We don't have to do anything. I don't have to  
7       present any case at all. But despite that, we have done our  
8       best to show you that the government's story is a version of  
9       the events and is incomplete. And I hope you have seen it.

10          The government acts as though we have the complete  
11       universe of information, that there is no other information  
12       out there that could be helpful. But I want you to think  
13       about this.

14          Where would we be without Darrell's phone and his  
15       laptop? Would the government still be arguing that it's  
16       ludicrous that Gena -- or would the government be arguing  
17       then that it was ludicrous to say that Gena Pyfrom-Foster had  
18       access to the Yahoo email account?

19          We would be operating with limited information,  
20       without critical facts in the case. But we still don't have  
21       all of the critical information in this case.

22          We don't have Gena's phone. We don't have other  
23       devices that were allegedly used. The agents saw other  
24       devices in Gena's house and didn't get them. What would that  
25       show us? What would that tell us?

1           You saw that we tried to get information about what  
2 the IP address for Gena Pyfrom-Foster's house was and we were  
3 unable to get it. You saw that we tried to get the login  
4 information or the IP information for the logins from  
5 Teldrin\_Foster@Yahoo.com and we couldn't get it. And we also  
6 tried to do that for the iCloud account and we were unable to  
7 do so when we came in later.

8           The government did not get a search warrant for any  
9 of Gena's email addresses or Mr. Foster's email addresses.  
10 And we are asking for you to demand more, that you should say  
11 this is incomplete information and is not enough.

12           I'm almost done, but I wanted to ask you to be  
13 careful or be wary of what happens after I sit down. I can't  
14 get back up and talk to you more about the case. So whatever  
15 they say, I want you to carefully consider whether there is  
16 evidence to support it. Was there testimony, or is it just  
17 an insinuation?

18           The last thing I want to talk to you about are the  
19 false accusations that were made in this case. I know this  
20 sounds outlandish. I know that. How can someone be framed  
21 for a case like this?

22           But we aren't just presenting some theory for which  
23 we don't have any evidence. There are things that  
24 legitimately should cause concern. We have admitted a lot of  
25 that. But in addition to everything that we have already

1 talked about, we know that at least three separate people  
2 tried to identify Teldrin Foster when they had no interaction  
3 with him.

4 Now, there is this sort of joke format on Twitter  
5 that says "If I had a nickel for every time something  
6 happens, I would have three nickels, which isn't a lot, but  
7 isn't it weird that it happened three times?"

8 And that's what I think about this. Isn't it weird  
9 that it happened three times? That Ricky Dixon came in and  
10 said it was Teldrin Foster, although he didn't actually say  
11 Teldrin Foster; right? He called him Taldrid. So that's a  
12 strong indication that he didn't actually know him and he was  
13 being told to identify someone because he didn't even get his  
14 name right.

15 But then we also have Charmaine Redding doing the  
16 same thing, identifying Teldrin Foster. And then we have  
17 Amanda Christian identifying someone with the last name of  
18 Foster as being involved.

19 And Agent Stites told you there is no evidence that  
20 any of that is true. There is no evidence that Teldrin  
21 Foster communicated with Ricky Dixon. There is no evidence  
22 that he communicated with Charmaine Redding. And there is no  
23 evidence that he communicated with Amanda Christian.

24 So I just think that should give someone some pause  
25 about this. But it's clear that it never did in this case.

1 It never had any impact on the investigation. It never made  
2 them think maybe there is more to this story.

3 So I'm asking you to do better than that. I'm  
4 asking you to consider this fact: The use of Teldrin  
5 Foster's devices, and to find that there is abundant  
6 reasonable doubt here.

7 And when you consider the case carefully and when  
8 you consider the rest of the story that we have told you, we  
9 ask that you return the only verdict that's supported by the  
10 evidence: Not guilty on all counts.

11 Thank you.

12 THE COURT: Mr. Marshall.

13 MR. MARSHALL: Thank you, Your Honor.

14 DEFENDANT JACKSON'S CLOSING ARGUMENT

15 MR. MARSHALL: I was thinking about something when  
16 John Gaines was testifying yesterday. The government  
17 prosecutor asked him a bunch of questions about Ms. Jackson's  
18 qualifications. She's a professional. She's a successful  
19 businesswoman, a senior project manager.

20 We know 20 years, maybe over decades at IBM,  
21 working her way up. Very successful. We got all those,  
22 those questions from -- Ms. Chaiken went over that. We went  
23 over her background.

24 And I thought to myself why would someone like that  
25 -- because I want to use my common sense about stuff. You

1 heard that, too, from the prosecutor.

2 Why would a woman who has lived decades as a  
3 successful woman, working her way up a career, all of a  
4 sudden, on a whim, decide to participate in a fraudulent  
5 PPP loan scheme with John Gaines or Darrell Thomas or André  
6 Gaines?

7 I want you to think about that through my argument  
8 and when you do deliberations.

9 There was no evidence presented during trial of any  
10 personal bank accounts of Ms. Jackson. We know that she was  
11 working. She had a successful job that she was working  
12 separate from Management Resource Services.

13 Management Resource Services was a company that she  
14 wanted to have grow. So when there is discussion about the  
15 pandemic and everything shutting down, there is no testimony  
16 about my client losing a job. She was working.

17 And use your own experiences to think, what's  
18 somebody that has 20 to 30 years of experience as senior  
19 project manager, what kind of money they probably make.  
20 Right?

21 So we had no testimony about personal bank  
22 statements or to show that maybe she was destitute. We saw  
23 evidence about Management Resources with low balances. It  
24 was a fledgling business, it was a business in its infancy,  
25 trying to be built. But no evidence about Ms. Jackson being

1 desperate, destitute, she needed money, she wanted money to  
2 get things like this.

3           So that's the thing I would ask you to think about  
4 in the back of your head when you are looking at this. Why  
5 would a woman like that just decide on a whim to do a  
6 fraudulent loan for \$339,000 and openly put it in her  
7 business account? Why would she do that?

8           Do you want to know why she would do it? John  
9 Gaines. The secret keeper.

10           We already know Mr. Gaines has admitted he  
11 committed -- he cheated on his wife. He had children outside  
12 the marriage, with another woman, never told his wife. Ended  
13 up devastating her.

14           We also know, from the government's evidence and  
15 their cross-examination of Mr. Gaines, of all the other fraud  
16 activities that he had been involved in.

17           I think I asked back -- I want -- the date was back  
18 to 2017 of doing fake documents for driver's licenses and  
19 titles for cars. Fake documents on letterhead. I.D. fraud.  
20 All of that. Emails communications referred to between John  
21 Gaines and a Marie, this Marie that we never see. Over and  
22 over again.

23           And I asked Mr. Gaines -- he had a difficult time  
24 on the stand. I admit that. But I asked, you know, did you  
25 ever tell Ms. Jackson about these activities? Did she know

1 about these activities? No. She didn't know about all of  
2 that.

3 And use your common sense. If you think a  
4 successful businesswoman like that, with everything she had  
5 earned and built up in her life, would stay with a man that  
6 was involved in activities like that, it doesn't make sense.  
7 It's not good common sense to think that.

8 John Gaines hid these activities from his wife all  
9 through his life as part of his marriage. It was what he  
10 was. He cheated on her, had kid outside the marriage, didn't  
11 tell her about these activities. And he certainly didn't  
12 tell her about a fraudulent PPP loan.

13 And we know John Gaines. He lies about things.  
14 But I'll give him credit for one thing. Why did he come in  
15 here and testify? And Ms. Chaiken -- I will give her credit,  
16 she did what defense attorneys love to do when the government  
17 brings these witnesses in.

18 Because what you saw yesterday was highly unusual.  
19 You don't get codefendants in cases coming in to testify for  
20 other codefendants. That's the rarity. You see codefendants  
21 coming in as cooperating witnesses for the government to make  
22 their case.

23 And when they get up on the stand, you see them  
24 ripped apart by defense attorneys, cross-examined for  
25 inconsistent statements, prior statements that they have had

1 during interviews, during proffer meetings.

2 If they have prior convictions, they're impeached  
3 with that. If they have been sentenced already, they get  
4 impeached with that. They are cross-examined about the bias  
5 that they have because what they are exchanging for their  
6 testimony is a free ticket or a lesser or lower sentence.

7 All that you know about Mr. Gaines right now is  
8 that he has pled guilty. There were no questions from me  
9 about his sentencing and things of that nature. He pled  
10 guilty.

11 But he got up there and testified. And if you may  
12 remember, towards the end, I think at the very end of my  
13 direct examination, I asked him, "Mr. Gaines, why are you  
14 here? Why did it take you all this time, over three years,  
15 to come here and say these words? Are you trying to fix  
16 something? Are you trying to fix something for your wife?"

17 And you saw on stand, when I finished and before  
18 Ms. Chaiken got up to ask questions, you saw a man, a big  
19 man, a large man, break down, and he was crying.

20 And you could evaluate what that meant. I saw it  
21 as real tears and a realization that he had put his wife in a  
22 position that was threatening her life with his actions and  
23 then she would have to suffer the consequences of that.

24 So let's go over a little bit, I want to go over a  
25 little bit of what John Gaines testified to a little bit

1 yesterday.

2 A lot of the time from the government, in the early  
3 part, dealt with being cross-examined about his plea hearing  
4 and his transcript. You heard that. And somehow that he was  
5 being untruthful in responses.

6 But you may remember that the questions that I was  
7 asking Mr. Gaines had to do with the funds that were coming  
8 from the check and the wire transfer. What were they going  
9 to be for? And they were going to be for this project in  
10 Alabama, and they were going to be for payroll. And I asked  
11 him several questions about would they have employees and all  
12 of that.

13 So he was cross-examined about his testimony at his  
14 plea hearing, and the government prosecutor made a big to-do  
15 about a couple pages there, and they were read out, to make  
16 it look like he was this big liar.

17 He wasn't lying about it. He was telling the  
18 truth. At his plea hearing he admitted responsibility for  
19 what he did.

20 He knew that the funds were not for payroll for  
21 Gaines Reservation and Travel because that was all a sham.  
22 That's all true, and he pled to that.

23 What he didn't say to you yesterday was that  
24 Ms. Jackson knew about any of that.

25 There were some questions about André Gaines and

1 about his medical history and so forth. Right? We heard  
2 that. And, by the way, it's already been pointed out by  
3 counsel for Mr. Foster, there are people in here that have  
4 not been brought in to testify.

5 In this case, what have we heard? I'm going to put  
6 up a chart just briefly for you, if I can. Here it is, right  
7 here.

8 What connects Carla Jackson? Now, there are other  
9 actors and parties in this overall case, but the person that  
10 pretty much is like in direct concert, or the intermediary  
11 with Carla Jackson and André Gaines, it's -- John Gaines is  
12 in the center there.

13 He has constant dealings with Darrell Thomas. And  
14 all those communications about creating documents and things  
15 like that, and a fraudulent PPP loan application for Gaines  
16 Reservation and Travel, that's Darrell Thomas, John Gaines,  
17 other people that are involved.

18 And then we have Ms. Jackson, who is told and  
19 represent -- he gets representations from Mr. Gaines about  
20 what this money is coming for.

21 But let's go on to the other person, André Gaines.  
22 The government never called André Gaines here. And this is  
23 always a concern of mine in cases sometimes. Whenever there  
24 is a back story that is a critical part of a case, I always  
25 ask: Where are your witnesses for this?

1           Why is it important that we hear from André Gaines  
2 and we never did? And don't let the fact that there might be  
3 medical issues -- we don't know that -- if it prevented him  
4 from being here.

5           But André Gaines supposedly wrote the form, signed  
6 the form for the PPP loan application. Supposedly had  
7 interactions with Agent Stites. Supposedly had interactions  
8 with John Gaines. Right? They're cousins. And had  
9 interactions, maybe at some point, with Carla Jackson.

10           André Gaines could come in here and tell you what  
11 he told Carla Jackson about this loan and what he knew. But  
12 he's not here to testify.

13           Darrell Thomas could come in here if the government  
14 wanted him to be here, and could get up on the stand and  
15 testify to you about, hey, I had all these conversations with  
16 John Gaines, I can tell you what I know about Carla Jackson.  
17 And we still don't have any information about that.

18           I want to jump ahead a little bit about one thing.  
19 Do you remember when the government started talking about  
20 these PPP loan applications for Management Resource Services  
21 and that Ms. Jackson had actually filled one out? And  
22 somehow that knowledge that she did a PPP loan application  
23 all of a sudden means that she knows about the fraudulent  
24 nature about what John Gaines is doing, and Darrell Thomas.

25           I think I pointed out that Government's

1 Exhibit 1228, that was that email that we put up on the  
2 screen, it had some kind of vulgar language in there, and  
3 it's telling -- John Gaines is telling Darrell Thomas, "now,  
4 this application, this is my wife's shit. Don't fuck this  
5 up."

6 Why would he say that? Why would he say that? And  
7 I asked Mr. Gaines -- and you are allowed to take him -- you  
8 can find him credible for whatever you want to find him  
9 credible for. If you want to pick and choose which  
10 statements you want to believe, you are allowed to do that.

11 The government wants you to disbelieve everything  
12 he says and find him untrustworthy. Well, we know that's not  
13 true. You get to pick and choose what he says is true or what  
14 you believe is truthful.

15 But I asked him about Government's Exhibit 1228 in  
16 that email, and I said was that because this was like a  
17 legitimate PPP loan for your ex-wife?

18 Yes.

19 Well, why would that be? Why would Carla Jackson  
20 need to do a real PPP loan application if she was in on the  
21 gig and knew that, man, if I do fraudulent ones, I can get  
22 \$339,000 put into my account and I could make a story up  
23 about projects in Alabama.

24 And I back up again. Why would a woman like Carla  
25 Jackson ever get involved in a fraudulent loan activity?

1 But remember that. Why would John Gaines have said  
2 that? I'll tell you why. Because he knew that his wife  
3 didn't know about the fraudulent nature of what he was doing.  
4 Otherwise, there is no reason to set up some legitimate  
5 PPP loan application.

6 And, by the way, that application was never  
7 submitted, never submitted at all. If the government really  
8 ever felt that bad about what happened with that and they  
9 thought it was fraudulent activity on the part of  
10 Ms. Jackson, they could have charged her. They didn't.

11 Let's go over some more things that he said. A  
12 whole slew of documents that were put up. I have already  
13 talked a little bit about this, the fake documents that he  
14 did, that's all to impeach his credibility.

15 But you know what I think is pretty credible? He  
16 did all those things. He was an incredible fake document  
17 obtainer. He would get documents whenever he wanted to.

18 But none of that's linked to my client.

19 He made a statement during his interview -- or his  
20 testimony yesterday about -- the prosecutor asked him about  
21 André Gaines and whether Ms. Jackson knew him. And I  
22 think -- what did he say? He vaguely knew.

23 I think this inference is from the government that  
24 Carla Jackson -- and this goes back to that knock and talk  
25 interview. That's what I refer to when agents or law

1 enforcement just pop up on your front door.

2 And there's a point when she is asked about André  
3 Gaines and if she knows him, and she says she knows of him.  
4 And that is supposed to be some indicia that she is hiding  
5 André Gaines and what she knows about him?

6 Well, we don't know the background, but John Gaines  
7 said she vaguely knows André. We all know that there's some  
8 family members that you just don't see very much. So that's  
9 not fleshed out. I'm going to go into that a little bit when  
10 we talk about the knock-and-talk interview.

11 Mr. Gaines got on the stand and testified that he  
12 cheated on his wife. It was infidelity. Are we going to  
13 disbelieve him for that? Do we think that's a true  
14 statement? Yes, I think so. I think we do.

15 The trip to Alabama. The government wants you to  
16 believe that this is all some made-up thing. Right? Now, we  
17 showed you some photos, they weren't the greatest photos, but  
18 there was one, at least, that showed a building there. And I  
19 think you may remember that I went back up on the stand and  
20 I, what I call refreshed his recollection and I showed him an  
21 image from my laptop. It was something that we pulled up,  
22 and it was a Google website. It wasn't Zillow.

23 And it was the property that he had gone out and  
24 looked at. And he testified that there was a sign there, and  
25 it said Call for more information and that's what he did. So

1 we know that he did go out there.

2           There is testimony from John Gaines that he made a  
3 trip out there and there was a project that they were  
4 planning to build. Okay. We have got that in there.

5           Questions to John Gaines about his text messages  
6 and whether he had everything. And we know that the  
7 government has a ton of evidence, and I don't know if they  
8 ever tried to obtain John Gaines's devices. We've already  
9 talked about that.

10           None of my client's devices were looked at.  
11 Computers were never obtained. Is that important in a case  
12 like this? Yes, it's important in a case like this.

13           Wouldn't it be helpful to know if there was any  
14 incriminating evidence in my client's computer at home?  
15 Instead of this circumstantial evidence, these inferences and  
16 suspicions and hunches about whether my client knew. Hard  
17 evidence would be really something. Right?

18           And did you ever see, in any of the emails or the  
19 WhatsApp messages or the text messages, anything, anything  
20 from my client? Not copied on. Wouldn't you be copied on  
21 one thing? Nothing.

22           Discussion -- he was asked questions about trying  
23 to hide the source, trying to move the money to Management  
24 Resource Services from Gaines Reservation and Travel because  
25 Darrell Thomas let him know that the government is starting

1 to clamp down on these PPP loans, we've got to move this  
2 money.

3           There is no testimony that Ms. Jackson knew  
4 anything about that, that that was the purpose for that.  
5 Okay?

6           He was asked questions about the cashier's check.  
7 We'll do that in a little bit.

8           There was a big hullabaloo about the \$30,000. I  
9 just don't see it. So we know money has come into this  
10 account, Management Resource Services and there was some  
11 money that was taken out for some auto loans. Okay. All  
12 right.

13           It doesn't immediately go to payroll. But that  
14 doesn't mean that's the type of thing where somebody is going  
15 to go out and buy a Rolls Royce or have a supercar in their  
16 garage. That's not that.

17           There were some expenses that were paid between two  
18 people that had been in a relationship. They were  
19 ex-spouses. And Mr. Gaines obviously requested this because  
20 his name was handwritten on two of the checks that were  
21 obtained.

22           So a big hullabaloo about the \$30,000. It just  
23 doesn't matter. It doesn't mean that Carla Jackson knows  
24 about this fraudulent activity.

25           Let me go into -- if I could put up at least the

1 basic government's evidence that we have. And I will take  
2 this one down here.

3 So this is what I consider to be the primary  
4 evidence that the government has. We have got this  
5 knock-and-talk show-up meeting. Again, the low monthly  
6 balances in Management Resource Services's bank account. The  
7 two large deposits. That forms the basis of Counts 46 and  
8 47. And I have already spoken a little bit about the \$30,000  
9 that were withdrawn, and then three checks.

10 Let's talk about a knock-and-talk.

11 Now, I have respect for Agent Stites. He has been  
12 in the FBI for a long time. He's a professional. He knows  
13 how to do his work. And you can tell he knows how to  
14 testify, he is very calm, he has a very good demeanor on the  
15 stand when he's answering responses.

16 What I don't necessarily have a high amount of  
17 respect for is the nature of how they do these  
18 knock-and-talks. And this is part of law enforcement's bag  
19 of skills. It's in their wheelhouse. This is what they do.  
20 I don't mean it's nefarious, but it's unfair.

21 So early in the morning -- and when I say "early,"  
22 I'm talking about 9:38 or 9:40 in the morning. Ms. Jackson,  
23 who is actually working, you can tell. She answers this way  
24 in the recording, she has got a meeting. And if this is  
25 during the pandemic, she has a phone call or maybe it's a

1 Zoom meeting.

2 And two men show up, and they might as well be two  
3 well-dressed salesmen coming to the house to want to sell  
4 because who else shows up at your door. You get sales people  
5 that do this; right?

6 So someone shows up, she's not prepared to talk to  
7 them. And instead of having, like, two aggressive salesmen  
8 wanting to sell people something -- and we know how we are  
9 with that. You have a really good salesman, you sometimes  
10 don't know what to say and you say the wrong thing and before  
11 you know it, you have signed a contract or you have got goods  
12 being delivered to your door.

13 But instead of salesmen, two of them showing up at  
14 your door, what do you have? Two men standing there. They  
15 are both armed because they are FBI agents, and they're also  
16 coming with a federal subpoena for grand jury records.

17 So it's not a typical thing. And for anybody that  
18 would have it happen to, it's probably shocking. It's  
19 probably surprising.

20 Agent Stites could have, when he stopped that first  
21 time, could have handed out his card, you know what, my name  
22 is Agent Stites, this is Agent Cromer. I would like to give  
23 you my card. I am very interested in talking to you. We're  
24 investigating some PPP loan fraud we think you might be  
25 involved in, and we will like to give you an opportunity --

1 if you want, go ahead and call somebody, call an attorney if  
2 you would like, and if they could give me a call at this  
3 number I would really appreciate it and see if we can have a  
4 meeting.

5           Wouldn't that be professional? Wouldn't that be  
6 something to have that? Right?

7           So let's talk about some of Ms. Jackson's  
8 responses. Right?

9           What did she respond to? What did she say?

10           When she was asked what the money was going to be  
11 used for, she said, came from Gaines Reservation and Travel,  
12 and it was going to be for payroll for a construction  
13 project. That's what she told them.

14           And she mentioned they were going to hire some  
15 subcontractors. They didn't have any employees yet, but she  
16 was going to be responsible for handling that. Right? So  
17 you know that and you've heard the recording several times.

18           Let's talk about how someone would maybe answer  
19 these types of things, right, and why they would do this.

20           When someone comes to the door, all of a sudden,  
21 remember, in the background we have this woman, a successful  
22 businesswoman, she has been told certain things by John  
23 Gaines about these loans. Right?

24           All of a sudden at her door, early in the morning,  
25 are two FBI agents. No evidence that ever in her life she

1 has ever faced this before.

2 And when you see that and he's asking questions  
3 about this, you might be thinking, oh my God, did John do  
4 something? Did he do something wrong? Did André do  
5 something? And being concerned about it.

6 And a person like that can make, in that split  
7 instant, decisions to make maybe limit what they say or try  
8 not to say everything because they may think "am I going to  
9 get him in trouble for something that I don't know about? Am  
10 I going to get myself in trouble?"

11 And sometimes what Ms. Jackson did there was what  
12 many people do in these situations. And as defense  
13 attorneys, we know it.

14 I tell my kids -- I don't know if all of you have  
15 children or many of you do. I have got grown kids, but when  
16 they were growing up, I would tell them this and you probably  
17 think, oh, well, this is a defense attorney saying this  
18 stuff. But I meant this.

19 I would say, you know, if you ever are stopped,  
20 always be polite and always be respectful to the police  
21 officer you are talking to, or if it's a detective or  
22 anything like that. Always do that. That's important.

23 But if anybody is ever asking you questions about  
24 something serious, right, and you didn't do anything at all,  
25 do not talk to the officer without talking to an attorney.

1           And what I would say is "Talk to your dad. Call  
2 your dad. Tell them you need to talk to an attorney, and  
3 call me." Right?

4           Now, why would I say that to a child of mine if  
5 they were facing a serious charge, to not say anything,  
6 knowing that they are innocent?

7           Because I know that you can make mistakes in how  
8 you respond in what you say to people. And if I had a child  
9 that was uncounseled and didn't have an attorney and was  
10 facing a serious charge -- maybe it's robbery, mistaken  
11 identity -- and my child decided to sit down and start giving  
12 answers and responses about where they were and this and  
13 that, and maybe they started to hide, like, "oh, I don't  
14 know. I was with my friend," that recording could be used in  
15 a trial, just like this, to make it look like my child did  
16 what they are accusing them of.

17           So I always advised them to do that because people  
18 don't respond well in those situations.

19           So there is a jury instruction that you will get  
20 from the judge about how to treat statements of defendants in  
21 situations like this. And you are to treat them with  
22 caution.

23           That's the biggest thing -- if the government  
24 didn't have this interview evidence, that's their biggest  
25 piece of evidence is how Ms. Jackson responded to the

1 questions by Agent Stites. When he knew that he wasn't going  
2 to even mention anything, he never mentioned anything about  
3 an attorney until the 12-minute mark of a 13-minute  
4 recording. And I asked him that. That word "attorney" did  
5 not even come out.

6 And I wouldn't want my child facing that, and I  
7 mean a child that could be 21, 25. Face that fear of an FBI  
8 agent, two of them, at your door.

9 Don't give the full credit or any credit to the  
10 nature of these responses that Ms. Jackson gave. Look at the  
11 context of how this was given and how it was conducted.

12 And so for all the professionalism that Agent  
13 Stites has, this is not a professional move. It's a quick  
14 move to try to get easy evidence from people that are not  
15 trained and they're not professional and don't deal -- have  
16 never dealt with FBI agents or detectives before.

17 I'm going to go over a couple of things in the  
18 evidence here.

19 We talked about the PPP loans applications from  
20 Management Resource Services. I've already addressed that.  
21 That's been brought in again, overlaying this entire case  
22 against my client.

23 It's not direct evidence. It's just suspicion on  
24 suspicion, and it's inferences, and she must have known.  
25 That's all what this is about.

1           Let's talk about the Roadrunner records. Why is  
2 that brought in? It's more suspicion about Ms. Jackson. She  
3 is a cofounder, a cosigner of that company with Mr. Gaines.  
4 We got testimony about that, I think, from Agent Stites about  
5 when that was formed. And we showed the bank statement that  
6 was up there.

7           And what was up there? A bunch of transactions.  
8 There was a \$71,000, an odd amount of deposit that came in.  
9 Mr. Gaines said that he thought he remembered what that was  
10 for. But there is no testimony that -- or evidence that my  
11 client knew that that came from anybody like Darrell Thomas  
12 for anything specific. It's not in the record.

13           And you may say, well, someone -- they're an  
14 organizer, they are a co-owner of a company, they must know  
15 about everything. You saw all the other transactions. This  
16 was John Gaines, that was his company he was running.

17           All the transactions on there were from him except  
18 a GEICO Insurance payment that came out of that company.

19           So no evidence that ties that. That's thrown in to  
20 make you think that somehow that's related. Well,  
21 Ms. Jackson isn't charged with anything related to  
22 Roadrunner.

23           That same type of technique is used by the  
24 government when they brought in a document -- actually, this  
25 came into evidence another way, when Roadrunner was on a list

1 of companies. Right? You saw that? Again there is nothing  
2 tying that to Ms. Jackson.

3 John Gaines up there -- remember the chart I put  
4 up? Everything comes through John Gaines, and it's Darrell  
5 Thomas and other individuals in this case.

6 It's just suspicion. She's not charged in Counts  
7 46 or 47 with anything related to Roadrunner. So remember  
8 that.

9 I talked about the Alabama project. There is this  
10 hullabaloo again, this question about this proposal. She  
11 mentions a proposal. And then there are questions from the  
12 government prosecutor to Agent Stites in this grand jury  
13 subpoena. This is a minor, but also a big issue.

14 I asked Agent Stites about the subpoena, and he  
15 recognized for the first time on the stand that the subpoena  
16 return what he got back from Ms. Jackson was missing two  
17 pages. That means two pages of document requests to give you  
18 instructions about what you are supposed to get back. And we  
19 have no idea what was even on that.

20 But that implies that she got an incomplete  
21 subpoena because he never followed up and found out what that  
22 was.

23 So I say this in reference to the proposal because  
24 somehow they put like it was a burden or an obligation of  
25 Ms. Jackson to come back to Agent Stites, weeks later or

1 months later, and somehow come up with documents for a  
2 proposal, or that she was supposed to provide that as part of  
3 these documents for the subpoena. No.

4 We talked about the computers. We already have  
5 evidence in the record that John Gaines lived at Carla  
6 Jackson's house. He accessed bank accounts from that house.  
7 You saw the Comcast record that showed that the IP address  
8 tied to that residence is Carla Jackson.

9 But Mr. Gaines had computers there. He had a  
10 desktop there. He had a laptop. We know he accessed that  
11 stuff. So that does not mean that Carla Jackson was involved  
12 in these loans or doing activities with him.

13 Let me show you the jury instruction on reasonable  
14 doubt again.

15 We'll go back to that. Go back to the missing  
16 evidence slide, please.

17 These are just some of things that I wrote down,  
18 and this isn't even an exhaustive list.

19 No testimony from key witnesses of Gaines  
20 Reservation and Travel, André Gaines. We already talked  
21 about that. No back story. None of that is filled in for  
22 us.

23 No testimony from key witness Darrell Thomas.

24 No emails, no WhatsApp messages, no text messages,  
25 no phone calls. No selected digital devices to analyze.

1 None of that was obtained.

2 No search warrants. No court orders. Nothing.

3 No direct knowledge of Ms. Jackson having knowledge  
4 of the illegality of these funds coming from André Gaines and  
5 Gaines Reservation and Travel.

6 No direct evidence of Ms. Jackson having knowledge  
7 that the purpose of the two large deposits was to conceal the  
8 funds, the money coming into her account.

9 No follow-up with Ms. Jackson, or her attorney,  
10 regarding a construction project. She is not obligated, once  
11 she's arrested and charged with things, to come out and say,  
12 hey, you know what? I'm going to bring you documents on my  
13 construction project. The incomplete subpoena that we have  
14 there.

15 Let's go to the jury instruction on reasonable  
16 doubt. And Mr. Foster's counsel already put this up.

17 This is -- all of the jury instructions are  
18 important, and you need to pay attention, please, to all of  
19 them when the Court reads through them.

20 This is the most important to me. And it's the  
21 third one and this was pointed out by Ms. Webster. Proof  
22 beyond a reasonable doubt is proof so convincing that you  
23 would be willing to rely and act on it without hesitation,  
24 without hesitation, in the most important of your own  
25 affairs.

1 Can you say that about the evidence that the  
2 government has put forth against Ms. Jackson? Is this the  
3 level of proof that, without hesitation, you would find  
4 someone close to you? Yeah, that without hesitation, this is  
5 proof beyond a reasonable doubt what I have heard.

6 And back on top, I keep asking of you to think of  
7 this for me. Why would a woman like this, at this stage in  
8 her life, with no proof that she's destitute or anything, get  
9 involved in a fraudulent PPP loan application out of the  
10 blue?

11 She didn't. Because John Gaines is a liar and he  
12 used his wife to move funds.

13 I'm going to read you just a couple more.

14 Put the money laundering slide up, please.

15 Now, there are additional definitions that you will  
16 get from the judge about what these elements of this offense  
17 mean. But the most important prongs here -- and you have to  
18 realize one thing, each of these elements have to be proven  
19 by the government beyond a reasonable doubt.

20 So that reasonable doubt slide that I just showed  
21 you about proof so convincing, each of these have to be  
22 satisfied with that level of reasonable doubt. So number two  
23 and four are the critical ones when you go back there.

24 She had to know -- and I'm going to go into that  
25 deliberate ignorance instruction in just a second.

1           So she had to know that the money and the funds  
2 were the proceeds of an unlawful activity. There is no  
3 direct evidence of that. This is just suspicion and hunches  
4 and implications about her activities.

5           Number four, that she knew the transaction was  
6 designed, in whole or in part, to conceal or disguise. This  
7 is basically that she knew this was being moved over to her  
8 bank account to hide it.

9           We know John Gaines was talking about, like -- it's  
10 referred to as a clawback. That everything is getting shut  
11 down and they're going to pull this money out and stuff.  
12 Right? But there is no proof that Ms. Jackson knew that.

13           Let's go to show you something else.

14           We can take that down. That's fine.

15           Let's go to the deliberate ignorance instruction  
16 that the government pointed out.

17           This is the instruction that you use when you don't  
18 have enough proof of actual knowledge. This is like  
19 someone -- they knew of something so much, but they stuck  
20 their head in the sand because they didn't want anyone to  
21 know that they knew about it. That's my summary of it. But  
22 you'll read the jury instruction for yourself and see what it  
23 is.

24           We wouldn't need this here if the government  
25 thought it had actual knowledge evidence about my client

1 knowing about this illegal nature of these funds. So read  
2 through this. Look at this. You may find -- let's go  
3 through here.

4 If a defendant's knowledge of a fact is an  
5 essential part of a crime, it's enough that the defendant was  
6 aware of a high probability that the fact existed, unless the  
7 defendant actually believed the fact did not exist.

8 So they give an example in here about someone being  
9 in possession of a controlled substance. And that's a good  
10 example to use, so look at that when you read the  
11 instruction.

12 So they give an example of -- let's say a defendant  
13 possesses a package and they believe it contains a controlled  
14 substance, but they deliberately avoid learning that it  
15 contains the controlled substance so he or she can deny  
16 knowledge of the package's contents. That's the ideal.  
17 That's a good example of what deliberate ignorance is.

18 And this is for proof of knowledge when you don't  
19 have sufficient evidence. So in this case, in that  
20 example -- so you may find that a defendant knew about the  
21 possession of a controlled substance if you determine beyond  
22 a reasonable doubt -- again, the highest standard, the most  
23 important jury instruction -- that the defendant actually  
24 knew about the controlled substance or had every reason to  
25 know but deliberately closed his or her eyes.

1           There is no evidence of that. Again, it's  
2           assumption and hunches that she was ignoring things. I guess  
3           the government's theory would be that she is not on any of  
4           these thousands of email communications and all of this  
5           because she was so smart, she made sure she was never on any  
6           email. No recording. That's not what this is.

7           Again, why would a woman at this stage and at this  
8           level of success in her life do this? It doesn't make sense.

9           Ms. Jackson is charged with two counts. I'm going  
10          to put those up on the screen again. I believe you'll get a  
11          copy of the indictment when you get back.

12          She is charged -- actually, she is charged in  
13          Counts 46 and 47, both money laundering counts. And they  
14          have the two separate dates for the two transactions you know  
15          about. And she is charged also with John Gaines.

16          Let me tell you a couple things about how this is  
17          laid out. This is not a conspiracy count. You have heard  
18          the government talk about jury instructions for a conspiracy.  
19          My client is not charged with a conspiracy. She's is not  
20          charged with a conspiracy with John Gaines.

21          This is what they refer to as a substantive count  
22          where she is charged with this specific offense, and then  
23          they'll lay out those elements of that specific offense for  
24          money laundering. Okay?

25          So those are the two counts that we have here.

1 Those are the two transactions. I ask you to think about  
2 that, all that primary evidence, and we'll go back to that  
3 primary evidence, the government's evidence again.

4 The knock-and-talk show-up meeting. I already  
5 talked about that. You get to totally weigh what the weight  
6 is and the worth of that interview.

7 The low balances. That doesn't mean anything. All  
8 kind of businesses have low monthly balances. Two large  
9 deposits, and then the withdrawals. A lot was made to do of  
10 those.

11 And then I believe the government will say that  
12 John Gaines was up here and provided additional evidence  
13 confirming what Ms. Jackson said.

14 But let me point out one thing: Mr. Gaines was  
15 brought here because he wanted to be here. He went through  
16 everything that he went through with the government  
17 prosecutor yesterday not because he was going to enjoy it.  
18 He wanted to be here to try to fix something that he messed  
19 up for for his ex-wife and he felt responsible for that.  
20 That's why he was here.

21 So I want to ask you, when you go back to the jury  
22 room, I want you to think about this, please. Think about  
23 the reasonable doubt jury instruction and the level of proof  
24 that you need. It's the highest proof level that we require.

25 Think about the testimony of John Gaines. And

1 think of this, also: I'm not sure if the government wants  
2 you to totally disbelieve everything John Gaines said  
3 yesterday or if they want you to believe some of it. But let  
4 me give you a twist on this.

5 Let's say you don't want to believe anything he  
6 says. All right. Then take everything he said yesterday in  
7 the testimony and shut it out of your mind. Take it away. I  
8 don't find anything he said credible, so I'm not going to  
9 believe it at all. And let's see what you are left with.  
10 The interview and the other evidence that I just showed you.

11 So if the government doesn't want you to believe  
12 John Gaines at all, don't. And let's look at the other  
13 evidence that's there. If the government is saying that they  
14 want you to believe some but not all, well, I'm going to tell  
15 you, you need to believe some stuff, too, that he said, that  
16 says that his wife, his ex-wife didn't know about this stuff.

17 You get to determine the credibility of all these  
18 witnesses and what you think is important.

19 Suspicion upon suspicion upon suspicion is not  
20 proof beyond a reasonable doubt.

21 I would ask you to, please, find Ms. Jackson not  
22 guilty on Counts 46 and 47 because the government has not met  
23 its burden of proof as to the elements of the offense.

24 Thank you.

25 THE COURT: Ms. Chaiken, how long do you think you

1 will need?

2 MS. CHAIKEN: Probably about 20 minutes, Your  
3 Honor.

4 THE COURT: We have been going about an hour and a  
5 half, so I think what I would like to do is take a short  
6 comfort break before lunch, so we can get all the closings in  
7 before the lunch break.

8 So let's take a five-minute -- five-minute break.

9 So five minutes from now, Officer, bring the jury  
10 back in.

11 And five minutes from now, Counsel, I'm going to  
12 walk back up here.

13 Okay.

14 Thank you.

15 (Jury withdrew from the courtroom at 12:31 p.m.)

16 (There was a recess at 12:31 p.m., and proceedings  
17 continued as follows at 12:36 p.m.)

18 THE COURT: Bring in the jury, please.

19 Counsel, I understand there were two minor changes  
20 in the jury instruction.

21 On page 10, 48 was changed to 42. And on page 20,  
22 the second half of that title was taken out.

23 Is that correct?

24 MS. CHAIKEN: Yes, Your Honor.

25 MS. WEBSTER: Yes, Your Honor.

1 THE COURT: Mr. Marshall?

2 MR. MARSHALL: Yes, Judge. Correct.

3 THE COURT: All right. Thank you.

4 (Jury enters the courtroom at 12:37 p.m.)

5 THE COURT: You all can be seated.

6 Ms. Chaiken, go ahead.

7 MS. CHAIKEN: Thank you, Your Honor.

8 REBUTTAL CLOSING ARGUMENT

9 MS. CHAIKEN: Both of the defense attorneys  
10 suggested to you that there are witnesses you didn't hear  
11 from that we could have called, and they wanted you to hear  
12 from them but we didn't call them.

13 And I want to be very clear. We have the burden of  
14 proof in this case. We embrace that burden of proof. But  
15 the defense has subpoena power, too. You saw the defense use  
16 that subpoena power to bring people to this witness stand.

17 And if the defense wanted you to hear from Darrell  
18 Thomas, from André Gaines, from Gena Pyfrom-Foster, they were  
19 equally able to get them on that witness stand.

20 We did not rely on the word of fraudsters in  
21 proving our case to you. We showed you the actual evidence  
22 so that you can see it with your own eyes and hear it with  
23 your own eyes and evaluate it, instead of needing to decide  
24 whether to believe someone who was involved in a massive  
25 fraud.

1           Now, I want to start with some of the points that  
2 Ms. Webster made as to Mr. Foster.

3           She talked about Jennifer Murray, their witness,  
4 Mr. Foster's girlfriend, whose testimony was that twice a  
5 year Mr. Foster's wife, Gena Pyfrom-Foster, calls his  
6 mistress and gives her the password to Teldrin Foster's  
7 phone.

8           And then Ms. Murray sends screenshots of that to  
9 Teldrin Foster so he knows that people have the passcode to  
10 his phone, and then that just keeps happening twice a year.  
11 He knows people have access to his phone. That doesn't make  
12 any sense. But that's the defense's evidence that Gena  
13 Pyfrom-Foster had access to Teldrin Foster's phone.

14           Here is the thing, though. In order to log into  
15 somebody's phone, you need to have their phone. And Jennifer  
16 Murray herself told you Mr. Foster had his phone with him all  
17 the time unless he left it in the car. And of course he did,  
18 because who doesn't? We all carry our cellphones with us all  
19 day long. That's how people get in touch with you.

20           The idea that, for an entire summer, he left his  
21 phone at his wife's house while he was running around with  
22 his girlfriend so that she could commit PPP fraud behind his  
23 back is preposterous.

24           I also want to talk about the rapid! PayCards.  
25 That's the rapid! PayCard that Teldrin Foster himself said he

1 had and explained what the purpose of it was for in the  
2 interview. He said the whole point was they were going to  
3 make it look like it was payroll, going to make it look real.

4 How did he know that? If he didn't have a  
5 rapid! PayCard or knew nothing about it, how did he know to  
6 even say what a rapid! PayCard was? And you saw that he said  
7 it was for him to collect his percentage.

8 And the defense wants you to believe that there was  
9 someone with a tablet or a watch that was somehow tied to his  
10 T-Mobile phone number that was running around town using his  
11 rapid! PayCard and making phone calls on his phone.

12 Well, ladies and gentlemen, when you go back to the  
13 jury room, please, please take a look at Government's  
14 Exhibit 2956. That's the T-Mobile records of those phone  
15 calls that were analyzed by Agent Berni. And when you look  
16 at them, you will see that every single call on those phone  
17 records is made from the same IMEI. That's the mobile  
18 equipment identification number. It's the number for the  
19 device.

20 There is not a tablet and a phone and a watch that  
21 are all making calls while someone runs around town using  
22 this card. It's Teldrin Foster's phone. And the defense  
23 wants you to think that every time that rapid! PayCard is  
24 used, it just happens to be that somebody with a watch is  
25 within three to seven miles of where the transaction is done,

1 but the transaction just happens to be hitting on the phone  
2 that's immediately next to where the transaction is being  
3 done. It doesn't make any sense.

4 Now, the defense talked a lot about things they  
5 told you about that we didn't. And that's because those  
6 things don't matter. They're not defenses.

7 We didn't tell you the specific names of the people  
8 who were the business owners or what their specific roles  
9 were because those people are not on trial. Those people  
10 have been charged, and that is a question for another day.

11 The fact that Teldrin Foster is charged in the same  
12 conspiracy with them does not mean that we need to prove that  
13 he directly talked to them, communicated with them, or even  
14 knew they existed. So we didn't tell you about that because  
15 that is not something that matters to your decision about  
16 what Teldrin Foster's role was.

17 Now, the defense also said that they're the ones  
18 that needed to tell you that the laptop that was seized was  
19 Darrell Thomas's laptop.

20 They did not need to tell you that. We told you  
21 that. Agent Stites sat on that stand and told you that we  
22 seized Darrell Thomas's laptop. We seized it from his home.  
23 He told you that the Yahoo account was on it.

24 We told you in our case that we determined Gena  
25 Pyfrom-Foster was using that Yahoo account. There was no

1 attempt to hide that. That's not something you learned from  
2 the defense for the first time. And Teldrin Foster told you  
3 that. He knew that that Yahoo account was on the computer.

4 And they say, well, he said it was on the desktop.  
5 You heard on the interview he uses desktop and laptop  
6 interchangeably. He told Agent Stites that they worked on  
7 the desktop together in the car, and then Agent Stites said  
8 "On a desktop in the car?" And then he said, "No, no, the  
9 laptop."

10 The point is he knew that his Yahoo account was on  
11 Darrell Thomas's computer.

12 And Ms. Webster referenced that LNK file that was  
13 downloaded from the Yahoo account. But I showed, when I  
14 cross-examined Mr. Persinger, that that bank statement that  
15 was supposedly accessed by whoever was using the Yahoo  
16 account on that computer, that very same day, it was sent via  
17 WhatsApp to Teldrin Foster.

18 What more evidence do you need that it was them  
19 working together, using that account on Darrell Thomas's  
20 computer and then sending the documents to each other so that  
21 they would have copies of them.

22 Now Ms. Webster also addressed this pattern, the  
23 pattern of texts, of WhatsApps, and emails that we showed  
24 you. And her proof that that pattern is wrong was that there  
25 were two instances cherrypicked from all of the hundreds and

1 thousands of WhatsApp messages that you had, and the hundreds  
2 of emails, two instances where there was an iCloud email that  
3 came in to Darrell Thomas's account right around the same  
4 time that Gena Pyfrom-Foster said, "I sent you documents."  
5 She didn't say which ones. She didn't identify that those  
6 were the ones she was sending. And we showed you that there  
7 were other documents that the Yahoo account sent right around  
8 that time.

9           Of course, there were emails coming in from the  
10 iCloud account because you saw how many businesses were  
11 involved in this. You saw that there were constantly emails  
12 going back and forth. And if you go and you look at Teldrin  
13 Foster's communications with Darrell Thomas, you will see  
14 that Darrell Thomas and Teldrin Foster were on the phone at  
15 the exact same time that Gena Pyfrom-Foster sent that  
16 message.

17           You will see that there was every reason for those  
18 iCloud messages to be coming in from Teldrin Foster at that  
19 time.

20           Now Ms. Webster mentioned the evidence of Gena  
21 Pyfrom-Foster emailing Darrell Thomas in April of 2020.  
22 Again, that's not something we deny. We told you she was  
23 involved in the beginning. She created the template.

24           You can see in that email that she sent to Darrell  
25 Thomas that, initially, it seems like she thinks maybe she is

1 helping him with something legitimate. Because she doesn't  
2 know him, she doesn't know that he is trying to commit fraud.

3           You saw how she writes. You saw how different it  
4 is from how Teldrin Foster writes. Full sentences, proper  
5 punctuation. You can compare that from what you have seen  
6 from Teldrin Foster to see that they were not controlling the  
7 same accounts. They were not -- that she was not controlling  
8 his accounts.

9           You also heard from Ms. Webster that Darrell Thomas  
10 sent Ms. Pyfrom-Foster a PPP application for Bellator Phront  
11 Group. First of all, you saw where he got that PPP  
12 application. He got it from Teldrin Foster.

13           But second of all, again, nobody is denying that  
14 Gena Pyfrom-Foster is involved. We all agree. We all agree  
15 on that. That's not what this trial is about. This trial is  
16 about Teldrin Foster.

17           Ms. Webster also mentioned that list of completed  
18 consulting contracts that Gena Pyfrom-Foster sent to Darrell  
19 Thomas. And ask yourself, if she had access to Teldrin  
20 Foster's WhatsApp account and she was using it, and she and  
21 Darrell Thomas had a conspiracy to frame Teldrin Foster, why  
22 would she send that list from her own account?

23           Why would she make it clear that anybody looking at  
24 those messages, that she worked on those loans? Because she  
25 did not have access to Teldrin Foster's account.

1           And Ms. Webster told you, when you are listening to  
2 the statement, to think about the fact that Teldrin Foster  
3 didn't know what Gena Pyfrom-Foster and Darrell Thomas had  
4 been doing.

5           How did he answer all of those questions in the  
6 interview? How did he even know that templates were created,  
7 that documents were exchanged, that there were plans to hire  
8 fake employees to make it look real, that there was a  
9 rapid! PayCard account, that loans had been submitted and  
10 approved?

11           How did he know any of that? How did he know what  
12 to say if he didn't know what had been happening? It doesn't  
13 make sense.

14           Going back to Gena Pyfrom-Foster, Ms. Webster  
15 mentioned the entire stack of exhibits with the metadata that  
16 Gena Pyfrom-Foster's name is on. I would ask you to go back  
17 and look at those in the jury room, too, because what you  
18 will see, and Mr. Kaushal showed you a little bit of it  
19 yesterday, is that every single one of those hundred-plus  
20 documents was created on the exact same day at the exact same  
21 time.

22           That's what happens when you create a template.  
23 Every person who saves it after that, it's going to list the  
24 same metadata, that Gena Pyfrom was the author.

25           You're also going to see that there's none of those

1 screenshots where anything happened in May because Gena  
2 Pyfrom-Foster created the template in April. And then she  
3 stayed out of it until Teldrin Foster kept messing it up  
4 because he didn't know how to change the numbers. He  
5 cookie-cuttered it, and Darrell Thomas needed better. So he  
6 started working with Gena Pyfrom-Foster so she could make it  
7 better in June.

8 Now Ms. Webster said, well, you saw the text that  
9 said "I'm thinking these need to be stamped." And she  
10 suggested to you that must have been Gena Pyfrom-Foster  
11 because she worked for the IRS. But you know from the  
12 testimony in the case it's actually the exact opposite.

13 Because you heard from Sal Hazel, from the IRS,  
14 that documents don't get sent back to businesses after they  
15 are stamped. The stamp actually makes it look fraudulent  
16 because when you submit a document to the IRS, the IRS stamps  
17 it and you never get it back.

18 You know who would know that? An IRS employee.  
19 You know who wouldn't? Someone who is Googling documents and  
20 trying to figure out how to make an IRS document look  
21 legitimate.

22 You heard again about Darrell Thomas getting all  
23 the money. Again, that's not relevant. You saw that this is  
24 exactly why Teldrin Foster and Darrell Thomas ultimately had  
25 a falling out. Because Teldrin said, "You are saying fuck my

1 percentage?" And that's it. They never spoke again after  
2 that.

3           You also heard that millions of dollars got seized  
4 from those accounts, and you will see that in the bank  
5 records as well. So Darrell Thomas didn't have all the money  
6 that he thought he was going to have. Maybe he was going to  
7 give Teldrin Foster more. But certainly, after it got  
8 seized, yep, fuck Teldrin Foster's percentage.

9           That doesn't mean Teldrin Foster didn't participate  
10 in the fraud. It just means that he was pissed he didn't get  
11 out of it what he wanted to.

12           Ms. Webster showed you a chart. It had all kinds  
13 of different standards about taking kids and arresting  
14 people. You are not going to see any of that in the  
15 instructions. None of it.

16           What the judge is going to tell you is that a  
17 reasonable doubt is a real doubt based on your reason and  
18 common sense after you have considered all the evidence in  
19 the case. That's the standard you should apply.

20           You should not let the defense move the goalposts  
21 by trying to impose other standards here.

22           Now the defense also started asking about evidence  
23 they wish that there had been. IP addresses, why didn't we  
24 subpoena IP addresses from Gena Pyfrom-Foster's house?

25           What would that have told us? You saw that Teldrin

1 Foster, on his driver's licenses, has listed that address as  
2 his residential address since 2015, and that that's still his  
3 address on his current driver's license now.

4 So finding out that an IP address at Gena's house  
5 was used to log into an account, what does that tell you?  
6 That doesn't help you figure out if it was Gena Pyfrom-Foster  
7 or if it was Teldrin Foster. You have to look to other  
8 evidence.

9 And finally, you heard about the false accusations  
10 that were made against Teldrin Foster. And you heard that  
11 Agent Stites did not rely on any of those. But what you also  
12 heard is that all three of those people told different  
13 stories.

14 You heard that Amanda Christian said someone named  
15 Foster from CDC Finance -- that's one of the lenders --  
16 called her. You heard that Ricky Dixon said that he didn't  
17 communicate with Darrell Thomas.

18 If this was a frame job, wouldn't everyone's  
19 stories be the same?

20 Wouldn't Ricky Dixon know that he was supposed to  
21 say Teldrin Foster instead of Taldrid?

22 Wouldn't Amanda Christian say that Foster was  
23 someone who worked on the loan, not some random person, whose  
24 name she doesn't know, at a bank?

25 What you heard is that by the time all of these

1 people talked to law enforcement, they knew they were under  
2 investigation. Darrell Thomas had already been arrested and  
3 indicted, and everyone was trying to save themselves. That  
4 does not tell you anything about whether Teldrin Foster was  
5 involved in this PPP loan fraud.

6 Moving on to Carla Jackson. You heard multiple  
7 times that John Gaines was this manipulative secret-keeper.  
8 And he was. But Ms. Jackson knew that before any of this  
9 happened. They got divorced in 2019. She knew she couldn't  
10 trust him. She knew he lied. He had multiple children,  
11 during their 30-year relationship, with other people.

12 There was no trust there. There was no reason for  
13 her to believe that what he was doing was legitimate because  
14 she knew that he was a manipulative liar.

15 But the one thing that he didn't hide from her is  
16 that he was doing PPP loans. He didn't hide that from her.  
17 You saw that because you saw the PPP loan application that he  
18 had her do. He didn't hide from her that that's what he was  
19 working on.

20 And there were arguments that were made by  
21 Mr. Marshall about that being a legitimate PPP loan. But go  
22 back and look at that application, Government's Exhibit 1228A  
23 and 1228B.

24 It was blank for the amount of payroll and the  
25 amount of employees. And you heard from Mr. Gaines, and you

1 saw in the evidence, and you heard from Ms. Jackson herself  
2 in her interview that Management Resource Services did not  
3 have any employees.

4 And if you go down to the certifications page, you  
5 will see that she initialed next to the certification that  
6 said this business was in operation on February 15 of 2020  
7 and had employees for whom it paid payroll. That was  
8 initialed.

9 There were also initials next to the certification  
10 that said all of the documents and the information in this  
11 application is true and all of the supporting documents is  
12 true. But there was no information and there was no  
13 documents. There was no real information provided.

14 And why would Carla Jackson, this sophisticated  
15 businesswoman, go to John Gaines, her manipulative, lying  
16 ex-husband, to help her get a legitimate PPP loan that she  
17 thought she was entitled to for her business? It doesn't add  
18 up.

19 As far as Mr. Gaines's testimony yesterday, I'm not  
20 sure if Mr. Marshall and I listened to the same testimony.

21 Mr. Gaines told you yesterday that the money  
22 actually was for payroll. He said that's what it was for.  
23 Gaines Reservation and Travel was doing a project that had  
24 payroll, even though he pleaded guilty two weeks ago to money  
25 laundering for making it look like it was payroll when it

1 actually wasn't.

2 And pinning him down on his testimony was kind of  
3 like trying to pin jello to the wall.

4 When Mr. Marshall first asked him about the  
5 project, he said they purchased a property in Alabama. Then  
6 later it turned into, "oh, we were going to purchase it. We  
7 went there a few times."

8 He couldn't remember who he went there with, didn't  
9 have the address, they had no plans. Sometimes he said he  
10 talked to Ms. Jackson about it. Sometimes he said they  
11 vaguely talked about it. Sometimes he said they didn't talk  
12 about it at all.

13 It was completely unclear when the project was  
14 going to happen, what the project was going to be. Why  
15 Gaines Reservation and Travel, which he said was a  
16 transportation business, was renovating an apartment building  
17 in Montgomery, Alabama. None of it added up.

18 Now Mr. Marshall mentioned Ms. Jackson's interview  
19 where she had said that she got the payments from André  
20 Gaines and he said that was some sort of indicia that she was  
21 trying to hide that she didn't really know André Gaines, or  
22 something about André Gaines.

23 That's not what it's an indicia of. It's an  
24 indicia of the fact that she was trying to hide the fact that  
25 she got the money from John Gaines.

1           When someone shows up at your door and asks you  
2 questions, the easiest answer to give is the truth. And the  
3 truth would have been that John Gaines gave her the money.  
4 The only reason why she didn't say that is because she knew  
5 she wasn't supposed to have that money. She knew she needed  
6 to give an explanation that would perpetuate the concealment  
7 of that money.

8           And you heard -- there were some allegations that  
9 this interview was unprofessional and unfair. You have now  
10 been in this courtroom with Agent Stites for over a week.  
11 You have heard his interviews. You have seen him testify.

12           And you can hear on the interview that was talking  
13 to Ms. Jackson from behind a screen door. He wasn't  
14 aggressive. He wasn't yelling. He didn't tell her she was  
15 required to talk to him. He didn't try to intimidate her.  
16 He gave her time when she said she needed to go back to talk  
17 to her boss.

18           When she took pauses, he just sat there and waited.  
19 And when she said she wanted an attorney, he left because  
20 that's what he is required to do when someone invokes and  
21 says they want an attorney.

22           The idea that the reason why she lied is because  
23 she was intimidated or she was taken off guard and that you  
24 should just disregard everything she said because she's  
25 someone who decided to try to lie to cover up for herself or

1 for John Gaines when she realized the FBI was at the door,  
2 that's exactly what shows you that she knew exactly what she  
3 was doing. She knew there was something to cover up for  
4 because if she didn't know that, there would have been no  
5 reason for her to just say "My ex-husband sent me this  
6 money."

7 Mr. Marshall tried to characterize the case against  
8 Carla Jackson as suspicion. But again, when you think about  
9 the type of evidence in this case, people don't email about  
10 committing fraud together. And we don't have a brain scanner  
11 that tells us what someone knows.

12 What you need to do to figure out what she knew is  
13 to look at her circumstances, to look at her actions, to look  
14 at her words. And all of those circumstances here show that  
15 she knew that this money was PPP money and that it was being  
16 hidden in her account.

17 Ms. Jackson is not here on trial because John  
18 Gaines asked her to commit money laundering. She is on trial  
19 because she said yes, and because she did it.

20 We ask you to return a guilty verdict against both  
21 Teldrin Foster and Carla Jackson.

22 Thank you.

23 THE COURT: All right. Thank you, Ms. Chaiken,  
24 Ms. Webster, and Mr. Marshall.

25 Ladies and gentlemen of the jury, we are now going

1 to take a lunch break. Is 45 minutes enough? Okay.

2 If everybody can be back at 1:45. At that time I  
3 will give you your instructions. And after your  
4 instructions, you will be able to start deliberations.

5 But importantly, you are not to start deliberations  
6 yet. You are not to discuss this case with anyone yet,  
7 including yourselves.

8 I hope you enjoy your lunch break.

9 Thank you for being here.

10 (Jury withdrew from the courtroom at 1:00 p.m.)

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12 (There was a lunch recess at 1:00 p.m.)

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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 Wednesday, February 14,  
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 14th day of February, 2024.

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

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| <p><b>LAW CLERK:</b> [1] 14/6<br/> <b>MR. KAUSHAL:</b> [3] 4/24 8/1 13/22<br/> <b>MR. MARSHALL:</b> [5] 14/9 14/13 75/13 75/15 105/2<br/> <b>MR. MOORE:</b> [1] 7/8<br/> <b>MS. CHAIKEN:</b> [17] 14/16 15/5 15/7 15/9 19/15 19/19 19/22 25/1 30/2 38/12 43/15 44/9 48/7 104/2 104/24 105/7 105/9<br/> <b>MS. DURRETT:</b> [4] 11/20 11/23 13/4 13/10<br/> <b>MS. WEBSTER:</b> [5] 14/18 49/3 49/13 49/15 104/25<br/> <b>THE COURT:</b> [25] 2/4 7/3 8/7 11/22 13/2 13/5 13/11 14/1 14/7 14/11 14/14 14/17 14/22 14/25 48/25 49/4 49/11 75/12 103/25 104/4 104/18 105/1 105/3 105/5 120/23<br/> <b>THE JURORS:</b> [2] 14/24 15/8</p>                                                                                                                                                                                                                                                                                                                                                                    | <p>64/24 66/17 66/18 110/21 117/6<br/> <b>2022</b> [1] 61/21<br/> <b>2024</b> [3] 1/12 122/11 122/20<br/> <b>21</b> [1] 93/7<br/> <b>215-1317</b> [1] 1/24<br/> <b>22</b> [2] 29/16 47/21<br/> <b>23</b> [1] 59/1<br/> <b>25</b> [1] 93/7<br/> <b>2956</b> [1] 107/14</p> | <p>110/10 111/20 111/22 111/25 112/9 115/5 120/16<br/> <b>accounting</b> [2] 39/10 39/11<br/> <b>accounts</b> [11] 26/12 30/18 30/21 30/21 30/23 60/17 76/10 96/6 111/7 111/8 114/4<br/> <b>accurate</b> [1] 122/18<br/> <b>accusations</b> [2] 73/19 115/9<br/> <b>accusing</b> [1] 92/16<br/> <b>act</b> [4] 18/1 36/5 71/13 97/23<br/> <b>acted</b> [1] 33/14<br/> <b>action</b> [4] 17/18 37/19 53/23 62/19<br/> <b>actions</b> [2] 79/22 120/13<br/> <b>actively</b> [2] 57/11 57/13<br/> <b>activities</b> [8] 77/16 77/25 78/1 78/6 78/8 78/11 96/12 99/4<br/> <b>activity</b> [10] 38/20 38/22 38/25 40/20 41/1 41/8 83/25 84/9 87/24 99/2<br/> <b>actors</b> [1] 81/9<br/> <b>acts</b> [3] 18/4 50/13 72/10<br/> <b>actual</b> [4] 55/21 99/18 99/25 105/21<br/> <b>actually</b> [35] 2/23 6/18 17/21 25/13 38/9 38/25 39/7 39/12 40/19 42/7 42/9 42/13 43/19 52/22 54/22 54/24 55/7 55/10 56/19 62/12 67/25 68/2 68/5 74/10 74/12 82/21 88/23 94/24 100/7 100/23 101/12 113/12 113/15 117/22 118/1<br/> <b>add</b> [7] 2/22 9/25 10/22 10/24 13/21 69/3 117/17<br/> <b>added</b> [2] 2/13 118/17<br/> <b>addition</b> [1] 73/25<br/> <b>additional</b> [4] 5/9 13/15 98/15 102/12<br/> <b>address</b> [13] 26/23 56/18 56/24 57/3 57/20 61/16 73/2 96/7 115/1 115/2 115/3 115/4 118/9<br/> <b>addressed</b> [2] 93/20 109/22<br/> <b>addresses</b> [6] 26/13 62/7 73/9 73/9 114/23 114/24<br/> <b>adjust</b> [1] 14/19<br/> <b>administrative</b> [1] 2/6<br/> <b>admit</b> [5] 45/3 58/22 58/24 71/23 77/24<br/> <b>admits</b> [1] 67/16<br/> <b>admitted</b> [10] 43/1 45/12 45/14 52/13 65/20 71/16 71/18 73/24 77/10 80/18<br/> <b>admitting</b> [2] 67/20 68/21<br/> <b>Adobe</b> [1] 29/18<br/> <b>adopt</b> [1] 8/25<br/> <b>advance</b> [1] 52/14<br/> <b>advances</b> [1] 71/13<br/> <b>advantage</b> [1] 11/14<br/> <b>Advertising</b> [1] 23/16<br/> <b>advised</b> [1] 92/17<br/> <b>affairs</b> [1] 97/25<br/> <b>affiliation</b> [1] 69/9<br/> <b>after</b> [25] 1/11 5/8 5/15 16/15 19/22 20/22 23/3 23/11 25/1 43/6 43/7 44/12 59/20 61/6 64/17 67/2 67/2 70/9 73/13 112/23 113/14 114/1 114/7 114/18 121/3<br/> <b>again</b> [50] 5/19 9/7 11/7 19/15 19/15 19/16 20/17 23/9 25/8 25/14 27/20 28/18 31/17 34/7 35/1 36/17 37/5 37/23 38/6 39/20 39/21 40/16 47/25 49/19 57/5 58/10 62/3 63/13 65/6 67/13 67/14 68/18 77/22 83/24 88/5 93/21 95/1 95/10 96/14 100/22 101/1 101/7 101/10 102/3 110/22 111/13 113/22 113/23 114/1 120/8<br/> <b>against</b> [9] 31/7 54/22 60/18 71/25 93/22 98/2 115/10 120/7 120/20<br/> <b>agent</b> [25] 3/10 55/14 55/18 55/23 63/11 64/12 74/19 82/7 88/11 89/20 89/22 89/22 93/1 93/8 93/12 94/4 95/12 95/14 95/25 107/15 108/21 109/6 109/7 115/11 119/10<br/> <b>agents</b> [9] 65/8 65/15 67/12 69/13 72/23 84/25 89/15 90/25 93/16<br/> <b>aggressive</b> [2] 89/7 119/14<br/> <b>ago</b> [3] 9/8 45/6 117/24<br/> <b>agree</b> [3] 36/2 111/14 111/14<br/> <b>agreement</b> [8] 17/6 35/11 35/14 35/18 36/3 36/9 53/15 54/3<br/> <b>ahead</b> [4] 49/12 82/18 90/1 105/6</p> |
| <p><b>\$</b><br/> <b>\$10</b> [1] 69/14<br/> <b>\$10,560</b> [1] 50/21<br/> <b>\$11</b> [1] 15/15<br/> <b>\$155,252.50</b> [1] 46/21<br/> <b>\$3,000</b> [1] 51/23<br/> <b>\$30,000</b> [4] 64/20 87/8 87/22 88/8<br/> <b>\$300,000</b> [1] 42/21<br/> <b>\$335,000</b> [2] 43/16 45/18<br/> <b>\$339,000</b> [2] 77/6 83/22<br/> <b>\$34,000</b> [1] 69/18<br/> <b>\$7,000</b> [1] 51/23<br/> <b>\$700,000</b> [1] 15/14<br/> <b>\$71,000</b> [1] 94/8</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p><b>3</b><br/> <b>30</b> [1] 76/18<br/> <b>30-year</b> [1] 116/11<br/> <b>30303-3361</b> [1] 1/24<br/> <b>31</b> [1] 23/19<br/> <b>3361</b> [1] 1/24</p>                                                                                                                | <p><b>4</b><br/> <b>404</b> [1] 1/24<br/> <b>42</b> [1] 104/21<br/> <b>45</b> [1] 121/1<br/> <b>46</b> [4] 88/7 95/7 101/13 103/22<br/> <b>47</b> [4] 88/8 95/7 101/13 103/22<br/> <b>48</b> [1] 104/21<br/> <b>487</b> [1] 8/10<br/> <b>490</b> [1] 8/10</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><b>/</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p><b>5</b><br/> <b>5-minuter</b> [1] 49/5<br/> <b>59</b> [4] 49/22 49/23 52/24 66/19</p>                                                                                                                                                                                 | <p><b>7</b><br/> <b>701</b> [1] 11/11<br/> <b>75</b> [1] 1/23</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>/s</b> [1] 122/23</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p><b>7</b><br/> <b>701</b> [1] 11/11<br/> <b>75</b> [1] 1/23</p>                                                                                                                                                                                                         | <p><b>8</b><br/> <b>808</b> [1] 11/12</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><b>1</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p><b>7</b><br/> <b>701</b> [1] 11/11<br/> <b>75</b> [1] 1/23</p>                                                                                                                                                                                                         | <p><b>9</b><br/> <b>90</b> [1] 1/7<br/> <b>924</b> [1] 9/17<br/> <b>940</b> [1] 59/3<br/> <b>941</b> [6] 15/25 19/4 58/10 58/15 59/2 65/25<br/> <b>941s</b> [7] 15/17 15/20 22/25 23/17 41/14 57/21 58/3<br/> <b>9:38</b> [1] 88/22<br/> <b>9:40</b> [1] 88/22<br/> <b>9:41</b> [1] 2/2</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p><b>10</b> [3] 51/3 64/24 104/21<br/> <b>10-minuter</b> [1] 49/5<br/> <b>10:00</b> [1] 13/17<br/> <b>10:01</b> [1] 14/21<br/> <b>10:23</b> [1] 59/4<br/> <b>10:29</b> [1] 59/3<br/> <b>10:42</b> [1] 59/15<br/> <b>10:53</b> [2] 49/7 49/8<br/> <b>11</b> [1] 50/21<br/> <b>1120</b> [2] 62/23 65/25<br/> <b>11:00</b> [1] 59/18<br/> <b>11:07</b> [2] 49/9 49/10<br/> <b>12-minute</b> [1] 93/3<br/> <b>1228</b> [2] 83/1 83/15<br/> <b>1228A</b> [1] 116/22<br/> <b>1228B</b> [1] 116/23<br/> <b>12:31</b> [2] 104/15 104/16<br/> <b>12:36</b> [1] 104/17<br/> <b>12:37</b> [1] 105/4<br/> <b>13-minute</b> [1] 93/3<br/> <b>1317</b> [1] 1/24<br/> <b>14</b> [6] 1/12 15/12 15/19 53/18 63/10 122/10<br/> <b>14th</b> [1] 122/20<br/> <b>15</b> [2] 51/2 117/6<br/> <b>18</b> [3] 46/23 47/14 47/17<br/> <b>1914</b> [1] 1/23<br/> <b>198</b> [1] 55/7<br/> <b>1986</b> [1] 3/6<br/> <b>1:00</b> [2] 121/10 121/12<br/> <b>1:20-CR-00296-JPB-5-20</b> [2] 1/5 122/12<br/> <b>1:45</b> [1] 121/2</p> | <p><b>8</b><br/> <b>808</b> [1] 11/12</p>                                                                                                                                                                                                                                 | <p><b>9</b><br/> <b>90</b> [1] 1/7<br/> <b>924</b> [1] 9/17<br/> <b>940</b> [1] 59/3<br/> <b>941</b> [6] 15/25 19/4 58/10 58/15 59/2 65/25<br/> <b>941s</b> [7] 15/17 15/20 22/25 23/17 41/14 57/21 58/3<br/> <b>9:38</b> [1] 88/22<br/> <b>9:40</b> [1] 88/22<br/> <b>9:41</b> [1] 2/2</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p><b>2</b><br/> <b>20</b> [6] 1/5 75/20 76/18 104/2 104/21 122/12<br/> <b>2015</b> [1] 115/2<br/> <b>2017</b> [2] 11/12 77/18<br/> <b>2019</b> [6] 15/21 15/25 23/20 23/21 59/3 116/9<br/> <b>2020</b> [27] 21/11 23/23 29/16 35/7 44/13 47/10 47/14 47/17 50/21 50/23 51/2 51/3 57/2 57/4 58/20 61/21 62/10 62/13 62/14 63/2 63/6 64/9</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p><b>8</b><br/> <b>808</b> [1] 11/12</p>                                                                                                                                                                                                                                 | <p><b>A</b><br/> <b>a.m</b> [6] 2/2 14/21 49/7 49/8 49/9 49/10<br/> <b>abetted</b> [1] 50/6<br/> <b>abetting</b> [3] 17/25 50/7 71/5<br/> <b>ability</b> [1] 12/5<br/> <b>able</b> [6] 12/23 12/23 30/21 69/3 105/19 121/4<br/> <b>about</b> [238]<br/> <b>absolutely</b> [2] 64/16 65/23<br/> <b>abundant</b> [1] 75/5<br/> <b>abuse</b> [2] 8/20 9/3<br/> <b>accepted</b> [2] 8/2 18/9<br/> <b>access</b> [18] 6/22 26/21 27/3 30/3 30/5 30/20 30/23 50/24 54/18 57/19 61/22 66/9 69/9 72/18 106/11 106/13 111/19 111/25<br/> <b>accessed</b> [3] 96/6 96/10 109/15<br/> <b>accessing</b> [1] 57/8<br/> <b>accomplish</b> [1] 35/14<br/> <b>according</b> [1] 6/13<br/> <b>account</b> [90] 20/2 21/11 21/18 23/3 24/7 24/8 26/1 26/4 26/8 26/9 26/9 26/9 26/22 27/4 29/3 29/4 29/5 29/6 29/12 29/20 29/21 30/3 30/6 30/15 30/16 30/16 38/9 38/13 38/14 38/15 39/7 40/1 40/2 42/22 43/9 43/16 44/15 44/22 45/19 46/21 47/19 47/20 47/22 47/24 48/3 50/22 51/2 51/5 51/8 51/9 56/20 57/5 57/8 57/13 57/17 57/19 57/23 58/9 58/17 59/4 59/19 59/21 64/21 64/21 64/22 65/6 72/18 73/6 77/7 83/22 87/10 88/6 97/8 99/8 108/23 108/25 109/3 109/10 109/13 109/16 109/19 110/3 110/7</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>A</b>                                                                                                                                                                                                                                                                                                      | <b>appropriate [2]</b> 3/7 5/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>automatically [1]</b> 71/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>AI [1]</b> 1/18                                                                                                                                                                                                                                                                                            | <b>approval [6]</b> 5/8 5/11 6/21 7/9 7/18 7/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>available [2]</b> 8/6 12/15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>aided [1]</b> 50/6                                                                                                                                                                                                                                                                                         | <b>approvals [2]</b> 7/5 7/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>avoid [3]</b> 42/11 42/15 100/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>aiding [3]</b> 17/24 50/7 71/4                                                                                                                                                                                                                                                                             | <b>approve [1]</b> 7/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>aware [3]</b> 8/18 42/8 100/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Alabama [9]</b> 43/22 46/2 47/14 80/10 83/23 85/15 95/9 118/5 118/17                                                                                                                                                                                                                                       | <b>approved [10]</b> 15/13 20/6 20/8 20/9 20/17 33/12 34/4 48/13 68/18 112/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>away [3]</b> 11/2 70/19 103/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>all [129]</b>                                                                                                                                                                                                                                                                                              | <b>apps [2]</b> 61/24 61/25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>B</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>allegations [1]</b> 119/8                                                                                                                                                                                                                                                                                  | <b>Appx [2]</b> 8/10 11/12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Babasijibomi [1]</b> 1/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>alleged [4]</b> 17/21 36/16 54/5 60/20                                                                                                                                                                                                                                                                     | <b>April [6]</b> 21/14 62/13 62/14 63/2 110/21 113/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>back [50]</b> 2/8 9/6 9/9 16/10 18/21 21/13 23/3 32/14 32/16 48/15 61/7 62/13 64/8 65/3 66/18 66/24 68/25 69/1 71/16 73/14 77/4 77/17 77/17 81/24 83/24 84/24 85/19 95/16 95/18 95/25 96/15 96/15 96/21 98/6 98/23 101/11 102/2 102/21 104/10 104/12 106/23 107/12 110/12 112/14 112/16 113/14 113/17 116/22 119/16 121/2                                                                                                                                                                                                                                                                                                                                      |
| <b>allegedly [1]</b> 72/23                                                                                                                                                                                                                                                                                    | <b>are [114]</b> 1/12 2/10 4/2 4/20 4/25 5/1 5/9 10/21 12/4 12/4 14/8 14/9 14/14 15/1 16/25 22/3 22/4 23/8 24/4 25/19 26/7 28/4 31/2 31/3 31/23 34/23 35/25 36/2 37/15 38/3 40/12 40/13 42/4 45/11 51/19 51/21 52/9 53/8 53/12 54/6 54/13 55/7 55/19 56/3 58/15 58/20 59/4 59/23 59/24 60/23 61/3 61/4 61/9 61/25 62/1 62/1 62/21 62/21 62/22 62/23 63/9 63/17 63/18 63/19 67/8 67/24 70/24 71/16 73/10 73/18 73/23 77/4 79/4 79/5 79/13 79/15 79/16 81/3 81/8 81/17 81/25 83/7 83/10 85/12 89/8 89/15 89/15 90/25 91/19 91/21 92/6 92/16 92/21 93/14 94/14 95/11 95/18 96/17 97/17 98/15 98/23 101/25 102/1 103/9 105/10 107/21 108/9 112/1 113/15 113/25 114/14 120/25 121/5 121/6 | <b>background [3]</b> 75/23 85/6 90/21                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>allowed [2]</b> 83/7 83/10                                                                                                                                                                                                                                                                                 | <b>aren't [4]</b> 2/12 22/8 66/8 73/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>backtracked [1]</b> 67/3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>alluded [1]</b> 8/18                                                                                                                                                                                                                                                                                       | <b>argued [2]</b> 3/17 71/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>bad [2]</b> 61/5 84/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>almost [1]</b> 73/12                                                                                                                                                                                                                                                                                       | <b>arguing [2]</b> 72/15 72/16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>bag [1]</b> 88/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>aloud [1]</b> 69/13                                                                                                                                                                                                                                                                                        | <b>argument [7]</b> 8/24 13/16 15/6 49/14 75/14 76/7 105/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>balances [4]</b> 76/23 88/6 102/7 102/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>already [16]</b> 4/2 22/12 37/16 73/25 77/10 79/3 81/2 84/12 86/8 88/8 93/20 96/4 96/20 97/16 102/4 116/2                                                                                                                                                                                                  | <b>arguments [2]</b> 15/2 116/20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>bank [38]</b> 6/10 6/11 16/2 16/5 16/12 16/23 17/5 17/6 18/20 22/18 22/21 22/21 22/23 34/20 34/24 35/5 35/6 35/6 35/9 36/2 37/23 37/24 37/24 41/14 41/18 47/21 51/2 51/4 64/22 76/10 76/21 88/6 94/5 96/6 99/8 109/14 114/4 115/24                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>also [49]</b> 2/13 5/6 5/9 5/11 5/11 8/20 10/22 16/22 17/4 17/24 19/6 20/10 27/13 30/11 31/13 31/25 33/19 34/20 35/8 35/19 36/24 40/12 42/8 43/5 43/25 50/22 51/21 51/22 62/4 65/9 67/10 69/3 73/5 74/15 77/14 89/15 95/13 101/15 103/1 106/24 108/17 109/22 111/9 111/17 112/25 114/3 114/22 115/11 117/9 | <b>arm's [1]</b> 44/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>banks [7]</b> 22/4 33/20 33/21 33/24 34/3 34/22 37/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>although [2]</b> 45/9 74/10                                                                                                                                                                                                                                                                                | <b>armed [1]</b> 89/15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>based [11]</b> 10/15 13/5 13/7 21/13 33/4 33/6 37/21 55/19 70/8 70/15 114/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>always [7]</b> 71/21 81/23 81/24 91/20 91/20 91/22 92/17                                                                                                                                                                                                                                                   | <b>around [9]</b> 16/18 21/20 33/25 72/2 106/21 107/10 107/21 110/3 110/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>basic [1]</b> 88/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>am [4]</b> 1/5 89/23 91/8 91/9                                                                                                                                                                                                                                                                             | <b>arrest [2]</b> 55/13 64/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>basically [5]</b> 17/6 32/24 35/10 42/11 99/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Amanda [4]</b> 74/17 74/23 115/14 115/22                                                                                                                                                                                                                                                                   | <b>arrested [4]</b> 3/9 64/11 97/11 116/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>basis [1]</b> 88/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Amendment [3]</b> 8/11 11/1 11/9                                                                                                                                                                                                                                                                           | <b>arresting [1]</b> 114/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>be [102]</b> 1/5 1/6 3/3 3/10 3/16 4/9 4/15 4/21 5/2 5/14 6/17 6/19 7/6 7/22 8/16 9/23 10/1 11/20 14/2 14/22 17/1 20/15 27/6 31/22 32/23 33/22 34/4 36/9 36/13 39/7 43/13 43/16 44/17 47/1 49/11 50/5 50/5 50/7 52/24 55/16 56/7 60/24 61/2 61/9 62/17 63/8 63/21 63/25 64/19 66/4 66/6 70/11 70/11 70/23 72/4 72/12 72/14 72/15 72/16 72/19 73/12 73/13 73/20 76/25 80/9 80/9 80/10 82/2 82/14 83/19 85/4 86/13 86/17 86/20 88/3 89/2 89/24 90/5 90/5 90/10 90/12 90/16 91/20 91/20 92/14 93/7 97/23 98/18 98/21 101/3 102/15 102/18 105/5 105/13 107/24 108/1 110/18 113/9 115/19 118/14 121/2 121/4                                                         |
| <b>AMERICA [4]</b> 1/4 51/2 51/4 122/11                                                                                                                                                                                                                                                                       | <b>ask [27]</b> 4/7 5/14 5/23 11/5 12/10 44/2 45/19 45/22 47/4 48/15 48/17 48/19 51/25 54/10 54/20 55/15 73/12 75/9 77/3 79/18 81/25 102/1 102/21 103/21 111/19 112/16 120/20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>bear [1]</b> 4/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>amount [7]</b> 5/5 25/9 69/20 88/16 94/8 116/24 116/25                                                                                                                                                                                                                                                     | <b>asked [30]</b> 4/18 12/2 12/8 12/13 23/11 24/21 24/24 25/17 44/21 47/15 47/21 48/4 65/6 75/17 77/17 77/23 77/24 79/13 80/10 83/7 83/15 84/20 85/2 86/22 87/6 90/10 93/4 95/14 118/4 120/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>became [1]</b> 24/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>analyze [1]</b> 96/25                                                                                                                                                                                                                                                                                      | <b>asking [21]</b> 11/25 12/1 25/23 25/24 26/6 27/10 27/13 28/3 28/4 30/19 45/2 59/24 62/3 73/10 75/3 75/4 80/7 91/2 91/23 98/6 114/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>because [106]</b> 5/10 5/25 6/5 6/10 7/1 7/9 7/17 8/3 9/11 9/18 10/23 13/13 17/10 17/22 21/9 21/14 21/15 21/22 22/14 23/1 23/19 24/13 24/22 25/4 25/9 25/13 25/15 27/6 29/25 30/4 32/5 33/1 33/10 34/2 36/9 36/18 37/20 38/14 38/22 40/16 43/6 43/16 43/19 44/16 44/25 45/22 46/16 47/4 47/15 48/4 48/12 54/8 59/13 61/17 62/11 63/15 64/2 66/12 67/15 71/2 74/13 75/25 78/18 79/5 80/21 83/16 84/2 86/24 87/19 89/4 89/15 91/8 92/7 92/17 95/21 95/23 98/11 99/20 101/5 102/15 102/17 103/22 106/18 108/5 108/9 108/14 110/10 111/1 111/24 112/17 113/1 113/4 113/11 113/13 113/16 113/25 116/13 116/17 119/4 119/19 119/22 119/24 120/4 120/17 120/19 120/19 |
| <b>analyzed [1]</b> 107/15                                                                                                                                                                                                                                                                                    | <b>asks [2]</b> 23/9 119/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>becomes [1]</b> 3/9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| <b>build</b> [1] 86/4                       | <b>Chaiken</b> [12] 1/16 3/17 4/8 9/22      | <b>comes</b> [5] 20/22 22/1 22/6 90/20 95/4 |
| <b>building</b> [4] 7/14 46/4 85/18 118/16  | 13/19 15/4 75/22 78/15 79/18 103/25         | <b>comfort</b> [1] 104/6                    |
| <b>built</b> [2] 76/25 78/5                 | 105/6 120/23                                | <b>coming</b> [13] 5/17 36/19 66/6 78/19    |
| <b>bullshit</b> [4] 28/19 28/19 28/20 28/21 | <b>chance</b> [3] 2/19 13/19 14/4           | 78/21 80/7 81/20 89/3 89/16 97/4            |
| <b>bunch</b> [2] 75/17 94/7                 | <b>change</b> [15] 21/15 21/22 21/23 23/1   | 97/8 110/9 110/18                           |
| <b>burden</b> [5] 71/22 95/24 103/23 105/13 | 23/2 25/5 25/6 25/10 25/16 29/8 30/7        | <b>commentary</b> [1] 3/19                  |
| 105/14                                      | 30/8 31/14 67/7 113/4                       | <b>commit</b> [17] 17/5 17/5 17/6 18/3 18/7 |
|                                             |                                             | 18/16 26/2 26/12 32/14 35/9 35/9            |

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| <b>C</b> | <p>control [4] 42/3 46/10 62/6 62/7<br/> controlled [5] 100/9 100/13 100/15<br/> 100/21 100/24<br/> controlling [2] 111/6 111/7<br/> conversations [2] 24/3 82/15<br/> convict [1] 71/2<br/> convicted [1] 72/5<br/> convictions [1] 79/2<br/> convince [1] 56/1<br/> convincing [4] 70/11 70/20 97/22<br/> 98/21<br/> cookie [2] 19/23 113/5<br/> cookie-cuttered [1] 113/5<br/> cookie-cuttered [1] 19/23<br/> cooperating [1] 78/21<br/> copied [2] 86/20 86/20<br/> copies [2] 14/9 109/21<br/> copy [2] 53/7 101/11<br/> correct [2] 104/23 105/2<br/> cosigner [1] 94/3<br/> could [40] 6/22 6/22 9/10 10/5 12/7<br/> 12/15 12/18 25/10 26/14 28/22 32/16<br/> 47/22 48/7 48/11 54/11 54/12 54/16<br/> 54/24 55/15 55/17 56/1 63/20 65/13<br/> 67/11 72/12 79/20 82/10 82/13 82/14<br/> 83/22 84/10 87/25 89/20 89/21 90/2<br/> 92/14 93/7 105/11 106/22 113/6<br/> couldn't [7] 24/22 45/5 45/12 47/18<br/> 73/5 116/9 118/8<br/> counsel [5] 10/15 81/3 97/16 104/11<br/> 104/19<br/> count [13] 34/19 39/16 49/21 49/22<br/> 49/23 52/24 53/24 53/25 54/3 54/4<br/> 66/19 101/17 101/21<br/> Count 59 [1] 49/22<br/> country [1] 34/13<br/> counts [14] 37/10 40/13 48/21 53/18<br/> 71/5 71/8 75/10 88/7 95/6 101/9<br/> 101/13 101/13 101/25 103/22<br/> Counts 46 [1] 88/7<br/> couple [7] 9/8 46/4 49/1 80/15 93/17<br/> 98/13 101/16<br/> course [7] 8/17 11/3 17/18 35/25<br/> 38/21 106/17 110/9<br/> court [21] 1/6 1/11 1/13 1/17 1/19<br/> 1/1 1/11 1/22 1/22 2/2 3/23 7/22<br/> 8/18 11/25 49/8 97/2 97/19 122/5<br/> 122/6 122/10 122/24<br/> Court's [1] 13/1<br/> Courthouse [1] 1/23<br/> courtroom [9] 10/16 13/8 14/21 49/7<br/> 49/10 104/15 105/4 119/10 121/10<br/> cousins [1] 82/8<br/> cover [3] 68/7 119/25 120/3<br/> covered [1] 37/15<br/> cr [2] 1/5 122/12<br/> create [6] 18/20 19/7 25/3 31/21<br/> 69/24 112/22<br/> created [10] 16/7 22/22 26/24 33/8<br/> 37/5 61/4 110/23 112/6 112/20 113/2<br/> creates [6] 20/13 21/1 21/5 21/18<br/> 22/7 24/8<br/> creating [4] 25/14 26/13 33/23 81/14<br/> Creations [4] 20/5 20/11 58/3 58/8<br/> credibility [2] 84/14 103/17<br/> credible [4] 83/8 83/9 84/15 103/8<br/> credit [4] 78/14 78/15 93/9 93/9<br/> crime [10] 18/3 35/22 45/8 50/8 50/9<br/> 50/10 50/15 50/16 72/4 100/5<br/> crimes [5] 16/19 17/1 17/6 35/9<br/> 35/11<br/> criminal [1] 41/1<br/> criminally [3] 18/3 18/4 50/12<br/> crisis [1] 15/11<br/> critical [4] 72/20 72/21 81/24 98/23<br/> Cromer [1] 89/22<br/> cross [9] 35/5 37/23 41/18 77/15<br/> 78/24 79/4 80/3 80/13 109/14<br/> cross-examination [1] 77/15<br/> cross-examined [5] 78/24 79/4 80/3<br/> 80/13 109/14<br/> CRR [2] 1/22 122/23<br/> crying [1] 79/19<br/> cryptic [1] 10/14<br/> current [1] 115/3<br/> custody [1] 70/19<br/> Customers [2] 35/6 37/24</p> | <p>Customs [4] 23/9 23/10 23/12 23/12<br/> cuttered [1] 113/5<br/> cuttered [1] 19/23<br/> cutting [1] 21/23</p> <p><b>D</b></p> <p>dad [2] 92/1 92/2<br/> daily [5] 46/13 46/17 46/22 47/5<br/> 47/13<br/> Darrell [136]<br/> Darrell's [5] 29/6 29/6 60/16 67/18<br/> 72/14<br/> data [1] 34/14<br/> date [2] 64/9 77/17<br/> dates [1] 101/14<br/> David [2] 1/18 68/24<br/> day [12] 4/13 5/19 14/25 20/1 20/1<br/> 36/8 51/14 106/19 108/10 109/16<br/> 112/20 122/20<br/> days [3] 1/7 9/8 21/17<br/> deal [1] 93/15<br/> dealings [1] 81/13<br/> dealt [2] 80/3 93/16<br/> decades [2] 75/20 76/2<br/> deceive [1] 17/19<br/> December [5] 23/19 50/23 64/9 64/24<br/> 66/16<br/> decide [5] 31/11 41/23 76/4 77/5<br/> 105/23<br/> decided [5] 10/2 30/23 32/16 92/11<br/> 119/25<br/> decision [3] 10/23 10/23 108/15<br/> decisions [4] 70/12 70/12 70/13 91/7<br/> declined [3] 5/20 9/8 10/12<br/> declining [1] 5/16<br/> deductions [1] 25/21<br/> defendant [21] 1/18 1/19 3/3 3/19<br/> 6/3 6/3 38/4 38/18 39/3 42/8 49/14<br/> 50/12 50/14 50/15 54/1 75/14 100/5<br/> 100/7 100/12 100/20 100/23<br/> defendant's [3] 3/8 3/22 100/4<br/> defendant-friendly [1] 3/19<br/> defendants [4] 1/8 48/17 54/6 92/20<br/> defense [44] 3/3 3/8 3/13 5/20 6/14<br/> 9/7 9/8 9/11 9/22 10/4 10/9 10/15<br/> 11/5 11/14 15/3 25/17 25/19 25/23<br/> 27/21 28/3 29/11 30/11 30/19 31/2<br/> 31/17 31/24 32/10 32/18 47/11 78/16<br/> 78/24 91/12 91/17 105/9 105/15<br/> 105/15 105/17 107/8 107/22 108/4<br/> 108/17 109/2 114/20 114/22<br/> defense's [1] 106/12<br/> defenses [3] 31/2 31/3 108/6<br/> definitions [1] 98/15<br/> deflect [1] 9/21<br/> defraud [10] 17/14 17/18 31/18 31/20<br/> 32/20 33/15 34/5 35/2 35/4 37/19<br/> defrauding [1] 17/21<br/> deliberate [3] 98/25 99/15 100/17<br/> deliberately [3] 42/14 100/14 100/25<br/> deliberations [3] 76/8 121/4 121/5<br/> delivered [1] 89/12<br/> demand [2] 55/2 73/10<br/> demeanor [1] 88/14<br/> demonstrate [1] 55/18<br/> denied [3] 12/9 12/12 12/14<br/> deny [3] 45/12 100/15 110/22<br/> denying [1] 111/13<br/> deposit [9] 39/23 40/2 50/18 50/20<br/> 51/14 51/15 66/18 66/24 94/8<br/> deposited [2] 46/21 64/20<br/> deposits [5] 40/13 51/23 88/7 97/7<br/> 102/9<br/> deputy [3] 7/10 7/14 7/22<br/> described [1] 63/18<br/> describing [1] 67/23<br/> deserved [1] 32/9<br/> designated [1] 39/9<br/> designed [4] 39/4 42/1 46/9 99/6<br/> desired [1] 3/22<br/> desires [1] 4/3<br/> desktop [7] 56/24 56/25 96/10 109/4<br/> 109/5 109/7 109/8<br/> desperate [1] 77/1<br/> despite [3] 54/8 61/10 72/7<br/> destitute [3] 76/22 77/1 98/8</p> |
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| <b>D</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>document [14]</b> 1/13 15/25 20/15 22/10 23/4 26/25 37/6 37/7 45/3 84/16 94/24 95/17 113/16 113/20                                                                                                                                                                                                                                              | 36/11 38/18 38/24 39/21 40/18 40/25 41/5 41/11 70/7 72/4                                                                                                                                                                                                        |
| <b>detail [1]</b> 38/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>documents [55]</b> 15/22 16/9 19/16 20/13 20/14 20/23 21/2 21/6 21/24 22/1 22/3 22/6 22/7 22/15 23/8 23/15 24/8 25/3 28/21 28/23 30/5 31/22 33/5 33/8 33/23 33/24 34/1 36/8 37/18 37/22 58/9 59/5 59/11 59/20 60/8 66/10 77/18 77/19 81/14 84/12 84/13 84/17 96/1 96/3 97/12 109/20 110/4 110/7 112/7 112/20 113/14 113/19 117/10 117/11 117/13 | <b>elements [14]</b> 17/10 34/23 37/9 37/15 38/1 38/3 39/14 39/20 40/15 41/24 98/16 98/18 101/23 103/23                                                                                                                                                         |
| <b>detailed [1]</b> 28/12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>does [22]</b> 8/12 17/20 23/3 31/13 32/13 34/8 35/15 40/11 52/14 53/15 54/3 62/7 63/19 63/20 64/3 68/5 68/6 71/13 96/11 108/12 115/5 116/4                                                                                                                                                                                                      | <b>Eleventh [5]</b> 3/6 8/15 8/23 8/24 11/12                                                                                                                                                                                                                    |
| <b>details [3]</b> 28/7 36/14 68/9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>doesn't [37]</b> 3/14 9/19 17/25 23/2 35/21 36/14 36/17 36/19 38/6 41/9 57/9 58/21 59/13 59/23 67/16 67/19 69/20 71/11 71/12 78/6 87/13 87/14 87/23 87/23 101/8 102/7 103/11 106/11 106/18 108/3 111/1 111/2 112/12 114/9 115/6 115/24 117/17                                                                                                   | <b>Elite [1]</b> 69/7                                                                                                                                                                                                                                           |
| <b>detective [1]</b> 91/21                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>doing [18]</b> 20/4 25/12 26/11 36/9 44/16 45/13 47/2 65/4 74/15 77/18 82/24 84/3 96/12 112/4 116/13 116/16 117/23 120/3                                                                                                                                                                                                                        | <b>else [8]</b> 30/9 43/3 53/4 54/18 57/19 61/22 89/4 99/13                                                                                                                                                                                                     |
| <b>detectives [1]</b> 93/16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>DOJ [1]</b> 5/10                                                                                                                                                                                                                                                                                                                                | <b>email [35]</b> 26/13 26/15 26/23 26/23 56/18 56/23 57/3 57/6 57/17 57/20 58/1 58/7 58/8 58/9 58/13 58/13 59/4 59/9 59/11 59/16 59/19 59/20 62/7 62/14 67/15 72/18 73/9 73/9 83/1 83/16 101/4 101/6 110/2 110/24 120/9                                        |
| <b>determine [2]</b> 100/21 103/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>dollars [2]</b> 27/16 114/3                                                                                                                                                                                                                                                                                                                     | <b>emailing [1]</b> 110/21                                                                                                                                                                                                                                      |
| <b>determined [1]</b> 108/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>don't [48]</b> 6/20 6/23 8/23 9/1 9/14 10/6 31/18 40/24 47/25 49/4 56/12 60/19 69/2 69/14 70/13 72/6 72/6 72/20 72/22 72/22 73/23 78/19 82/2 82/3 82/17 83/4 85/6 85/8 86/7 87/9 88/16 88/20 89/10 91/9 91/14 92/13 92/18 93/9 93/15 99/17 100/18 103/5 103/8 103/12 108/6 113/14 120/9 120/10                                                  | <b>emails [29]</b> 16/10 21/10 27/1 28/17 54/23 56/5 56/6 56/7 57/8 57/12 57/24 58/20 59/8 59/23 60/3 60/10 60/17 65/5 65/7 67/13 67/13 67/15 77/20 86/18 96/24 109/23 110/2 110/9 110/11                                                                       |
| <b>devastating [1]</b> 77/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>done [14]</b> 4/3 5/14 7/17 8/25 10/5 29/21 38/7 45/15 63/20 70/25 72/7 73/12 107/25 108/3                                                                                                                                                                                                                                                      | <b>embrace [1]</b> 105/14                                                                                                                                                                                                                                       |
| <b>device [2]</b> 57/7 107/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>door [10]</b> 85/1 89/4 89/12 89/14 90/20 90/24 93/8 119/1 119/13 120/1                                                                                                                                                                                                                                                                         | <b>employee [8]</b> 19/8 65/19 65/24 65/25 66/5 66/12 66/12 113/18                                                                                                                                                                                              |
| <b>devices [8]</b> 54/19 61/23 72/23 72/24 75/5 86/8 86/10 96/25                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>doubt [26]</b> 41/21 50/1 69/24 70/5 70/7 70/8 70/8 70/18 70/21 70/24 71/5 71/24 72/3 75/6 96/14 97/16 97/22 98/5 98/19 98/20 98/22 100/22 102/23 103/20 114/17 114/17                                                                                                                                                                          | <b>employees [11]</b> 25/8 42/19 43/17 45/17 68/13 80/11 90/15 112/8 116/25 117/3 117/7                                                                                                                                                                         |
| <b>devised [1]</b> 17/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>down [14]</b> 6/21 24/5 42/23 73/13 76/15 79/19 87/1 88/2 92/11 96/17 99/11 99/14 117/4 118/2                                                                                                                                                                                                                                                   | <b>end [4]</b> 5/19 67/11 79/12 79/12                                                                                                                                                                                                                           |
| <b>did [76]</b> 11/8 12/22 20/6 20/9 23/22 23/24 24/11 25/4 25/13 28/14 29/13 31/16 31/24 34/1 38/25 41/3 41/16 41/22 47/3 47/3 49/1 50/4 51/16 55/23 59/16 63/5 64/9 64/24 65/2 65/8 65/9 65/18 68/5 68/17 69/14 69/18 70/2 71/23 73/8 74/25 77/24 77/25 78/14 78/16 79/14 80/19 82/2 82/22 84/14 84/16 84/22 85/25 86/1 86/18 90/9 90/9 91/3 91/4 91/4 91/11 92/15 93/4 100/7 105/20 106/17 107/4 107/5 108/20 111/25 112/5 112/6 112/11 112/11 115/11 117/2 120/19                                                    | <b>downloaded [1]</b> 109/13                                                                                                                                                                                                                                                                                                                       | <b>ended [3]</b> 19/4 23/19 77/12                                                                                                                                                                                                                               |
| <b>didn't [82]</b> 6/11 7/1 7/2 10/20 11/6 12/10 13/3 13/9 13/19 16/16 21/15 21/16 21/23 24/23 25/5 25/6 30/7 30/7 30/13 32/3 32/3 36/17 42/10 43/18 43/18 45/16 45/19 45/22 46/25 46/25 54/9 54/19 64/25 65/3 65/4 65/5 66/20 66/21 66/22 72/24 74/10 74/12 74/13 78/1 78/10 78/11 80/23 84/3 84/10 90/15 91/24 92/9 92/24 98/11 99/20 103/16 105/10 105/12 107/4 108/5 108/7 108/14 110/5 110/5 112/3 112/12 113/4 114/5 114/9 114/10 114/23 115/16 116/15 116/16 116/18 118/8 118/11 118/21 119/4 119/14 119/15 120/4 | <b>downloading [1]</b> 57/11                                                                                                                                                                                                                                                                                                                       | <b>enforcement [3]</b> 64/3 85/1 116/1                                                                                                                                                                                                                          |
| <b>difference [1]</b> 35/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>draft [1]</b> 36/1                                                                                                                                                                                                                                                                                                                              | <b>enforcement's [1]</b> 88/18                                                                                                                                                                                                                                  |
| <b>different [8]</b> 7/14 21/19 25/9 25/15 53/18 111/3 114/13 115/12                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Drive [1]</b> 1/23                                                                                                                                                                                                                                                                                                                              | <b>enjoy [2]</b> 102/17 121/8                                                                                                                                                                                                                                   |
| <b>difficult [1]</b> 77/23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>driver's [3]</b> 77/18 115/1 115/3                                                                                                                                                                                                                                                                                                              | <b>enough [7]</b> 42/8 50/11 71/1 73/11 99/18 100/5 121/1                                                                                                                                                                                                       |
| <b>digital [1]</b> 96/25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>during [14]</b> 15/11 15/13 28/11 42/22 45/13 45/22 61/18 64/6 76/9 79/1 79/1 84/19 88/25 116/11                                                                                                                                                                                                                                                | <b>enters [3]</b> 14/21 49/10 105/4                                                                                                                                                                                                                             |
| <b>direct [8]</b> 35/24 36/3 79/13 81/10 93/23 97/3 97/6 99/3                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Durrett [3]</b> 1/19 11/22 13/3                                                                                                                                                                                                                                                                                                                 | <b>entertain [1]</b> 4/2                                                                                                                                                                                                                                        |
| <b>direction [1]</b> 27/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>duty [1]</b> 12/10                                                                                                                                                                                                                                                                                                                              | <b>entire [5]</b> 57/7 65/20 93/21 106/20 112/15                                                                                                                                                                                                                |
| <b>directly [6]</b> 21/21 51/22 62/2 62/12 62/15 108/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>E</b>                                                                                                                                                                                                                                                                                                                                           | <b>entirely [2]</b> 11/2 28/3                                                                                                                                                                                                                                   |
| <b>disadvantage [1]</b> 11/15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>each [25]</b> 15/14 15/15 15/18 16/5 16/20 17/4 17/11 18/7 25/3 32/20 34/17 34/18 36/10 37/10 39/15 39/19 53/15 53/23 53/24 53/25 54/1 69/18 98/18 98/21 109/20                                                                                                                                                                                 | <b>entitled [2]</b> 3/3 117/17                                                                                                                                                                                                                                  |
| <b>disapprove [1]</b> 61/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>earlier [5]</b> 2/21 10/10 10/11 63/14 63/16                                                                                                                                                                                                                                                                                                    | <b>entry [1]</b> 1/10                                                                                                                                                                                                                                           |
| <b>disbelieve [3]</b> 83/11 85/13 103/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>early [5]</b> 10/10 80/2 88/21 88/21 90/24                                                                                                                                                                                                                                                                                                      | <b>equal [1]</b> 61/4                                                                                                                                                                                                                                           |
| <b>discretion [4]</b> 8/20 9/4 10/2 11/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>earned [1]</b> 78/5                                                                                                                                                                                                                                                                                                                             | <b>equally [1]</b> 105/19                                                                                                                                                                                                                                       |
| <b>discuss [2]</b> 2/17 121/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>easier [1]</b> 11/17                                                                                                                                                                                                                                                                                                                            | <b>equipment [2]</b> 48/9 107/18                                                                                                                                                                                                                                |
| <b>discussed [3]</b> 37/16 43/20 63/25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>easiest [1]</b> 119/2                                                                                                                                                                                                                                                                                                                           | <b>error [1]</b> 11/13                                                                                                                                                                                                                                          |
| <b>discussing [2]</b> 33/20 71/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>easy [3]</b> 18/14 70/12 93/14                                                                                                                                                                                                                                                                                                                  | <b>especially [2]</b> 61/6 61/18                                                                                                                                                                                                                                |
| <b>discussion [2]</b> 76/14 86/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>eat [1]</b> 24/18                                                                                                                                                                                                                                                                                                                               | <b>Esq [6]</b> 1/16 1/16 1/17 1/18 1/19 1/19                                                                                                                                                                                                                    |
| <b>disguise [3]</b> 42/2 46/10 99/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>ECF [2]</b> 1/5 1/6                                                                                                                                                                                                                                                                                                                             | <b>essential [1]</b> 100/5                                                                                                                                                                                                                                      |
| <b>disregard [1]</b> 119/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>economy [1]</b> 42/24                                                                                                                                                                                                                                                                                                                           | <b>essentially [1]</b> 34/23                                                                                                                                                                                                                                    |
| <b>disrupts [1]</b> 59/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Education [1]</b> 23/5                                                                                                                                                                                                                                                                                                                          | <b>establish [3]</b> 55/21 56/1 71/11                                                                                                                                                                                                                           |
| <b>distinction [1]</b> 40/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>eight [1]</b> 59/18                                                                                                                                                                                                                                                                                                                             | <b>established [2]</b> 50/20 50/22                                                                                                                                                                                                                              |
| <b>District [10]</b> 1/19 1/1 1/1 1/11 4/11 34/12 41/17 41/19 122/6 122/6                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>either [3]</b> 9/1 9/15 45/17                                                                                                                                                                                                                                                                                                                   | <b>establishes [1]</b> 72/3                                                                                                                                                                                                                                     |
| <b>DIVISION [1]</b> 1/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>element [20]</b> 10/9 17/13 32/21 32/22 33/13 33/14 34/6 34/18 35/7 35/13                                                                                                                                                                                                                                                                       | <b>estate [1]</b> 48/8                                                                                                                                                                                                                                          |
| <b>divorced [1]</b> 116/9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                    | <b>estimate [1]</b> 7/4                                                                                                                                                                                                                                         |
| <b>Dixon [14]</b> 4/20 6/4 6/6 6/9 8/2 9/18 10/25 12/2 13/12 54/7 74/9 74/21 115/16 115/20                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                    | <b>ETA [1]</b> 23/10                                                                                                                                                                                                                                            |
| <b>Dixon's [1]</b> 12/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                    | <b>evaluate [2]</b> 79/20 105/23                                                                                                                                                                                                                                |
| <b>do [78]</b> 5/25 7/1 7/20 8/24 10/2 10/20 12/16 12/16 13/17 13/21 14/7 20/6 23/22 24/15 25/10 26/15 27/5 27/8 29/17 30/8 30/23 35/22 36/5 38/8 41/5 42/19 43/24 47/13 52/18 55/21 60/8 61/14 65/15 68/13 70/14 72/6 73/6 73/7 75/3 76/8 77/5 77/7 77/8 77/8 78/16 80/7 80/14 82/19 83/10 83/20 83/21 85/13 85/14 87/7 88/13 88/17 88/19 89/5 89/14 90/19 91/3 91/4 91/4 91/12 91/15 91/22 91/24 91/25 92/17 101/8 102/9 103/25 104/5 109/18 116/18 119/20 120/12 122/7                                                |                                                                                                                                                                                                                                                                                                                                                    | <b>even [43]</b> 3/4 4/12 6/22 7/16 7/20 8/3 8/23 9/22 11/13 11/16 11/17 13/12 18/9 28/8 32/11 36/14 39/10 41/1 43/19 46/2 47/9 52/21 57/9 58/22 59/23 62/17 64/22 65/10 65/10 66/8 67/1 67/2 69/19 70/25 74/13 93/2 93/5 95/19 96/18 107/6 108/13 112/6 117/24 |
| <b>docket [3]</b> 1/10 1/4 9/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                    | <b>events [1]</b> 72/9                                                                                                                                                                                                                                          |

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             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| <b>E</b> | <p> <b>evidence...</b> [80] 29/12 29/13 29/19 29/21 30/13 32/19 35/1 35/24 36/3 36/5 36/6 39/1 46/8 48/20 50/19 52/1 52/10 52/14 53/1 53/25 54/1 56/15 60/21 62/4 65/11 66/8 67/9 70/10 70/16 70/20 71/23 73/16 73/23 74/19 74/20 74/21 74/23 75/10 76/9 76/23 76/25 77/14 86/7 86/14 86/15 86/17 88/1 88/4 90/25 92/24 92/25 93/14 93/18 93/23 94/10 94/19 94/25 96/5 96/16 97/6 98/1 99/3 99/25 100/19 101/1 102/2 102/3 102/3 102/12 103/10 103/13 105/21 106/12 109/18 110/20 114/18 114/22 115/8 117/1 120/9<br/> <b>evidentiary</b> [2] 3/4 3/5<br/> <b>ex</b> [9] 43/8 44/15 44/21 83/17 87/19 102/19 103/16 117/16 120/5<br/> <b>ex-husband</b> [5] 43/8 44/15 44/21 117/16 120/5<br/> <b>ex-spouses</b> [1] 87/19<br/> <b>ex-wife</b> [3] 83/17 102/19 103/16<br/> <b>exact</b> [9] 10/21 24/6 25/9 41/10 63/19 110/15 112/20 112/20 113/12<br/> <b>exactly</b> [7] 4/15 23/11 28/8 71/1 113/24 120/2 120/2<br/> <b>examination</b> [2] 77/15 79/13<br/> <b>examined</b> [5] 78/24 79/4 80/3 80/13 109/14<br/> <b>example</b> [9] 6/7 20/5 23/16 59/1 100/8 100/10 100/12 100/17 100/20<br/> <b>Excel</b> [1] 24/23<br/> <b>except</b> [2] 34/24 94/17<br/> <b>exception</b> [1] 8/21<br/> <b>exceptions</b> [3] 8/19 9/1 9/1<br/> <b>exchanged</b> [3] 18/21 28/17 112/7<br/> <b>exchanging</b> [2] 36/8 79/5<br/> <b>Exclusive</b> [2] 50/22 51/5<br/> <b>exculpatory</b> [5] 8/22 9/14 9/18 9/24 10/19<br/> <b>Executive</b> [1] 69/7<br/> <b>exercise</b> [2] 10/2 11/18<br/> <b>exhaustive</b> [1] 96/18<br/> <b>Exhibit</b> [4] 83/1 83/15 107/14 116/22<br/> <b>Exhibit 1228</b> [1] 83/1<br/> <b>Exhibit 2956</b> [1] 107/14<br/> <b>exhibits</b> [4] 48/16 65/20 71/18 112/15<br/> <b>exist</b> [2] 42/10 100/7<br/> <b>existed</b> [4] 42/9 53/11 100/6 108/14<br/> <b>existing</b> [1] 33/5<br/> <b>exists</b> [1] 30/12<br/> <b>Exotic</b> [2] 23/9 23/12<br/> <b>expense</b> [1] 48/13<br/> <b>expenses</b> [2] 16/17 87/17<br/> <b>experience</b> [2] 4/10 76/18<br/> <b>experiences</b> [1] 76/17<br/> <b>expert</b> [2] 29/15 30/11<br/> <b>explain</b> [7] 2/14 2/15 3/14 5/16 17/17 28/22 40/16<br/> <b>explained</b> [2] 3/6 107/1<br/> <b>explaining</b> [1] 3/7<br/> <b>explanation</b> [1] 119/6<br/> <b>explanations</b> [1] 28/12<br/> <b>explore</b> [1] 10/11<br/> <b>explored</b> [2] 10/4 10/24<br/> <b>exploring</b> [1] 9/6<br/> <b>extent</b> [1] 3/24<br/> <b>eyes</b> [6] 42/14 57/1 59/25 100/25 105/22 105/23 </p> | <p> <b>fair</b> [1] 32/4<br/> <b>fairly</b> [2] 5/4 5/14<br/> <b>fake</b> [23] 15/22 16/1 16/2 16/4 18/20 22/20 22/23 26/13 28/21 33/23 37/5 37/7 37/21 37/21 41/13 41/13 41/14 57/13 77/18 77/19 84/13 84/16 112/8<br/> <b>falling</b> [1] 113/25<br/> <b>false</b> [9] 16/23 17/15 32/22 33/11 35/2 37/14 37/17 73/19 115/9<br/> <b>family</b> [1] 85/8<br/> <b>far</b> [5] 9/13 10/13 35/23 41/11 117/19<br/> <b>faster</b> [1] 7/17<br/> <b>favor</b> [1] 2/24<br/> <b>favorable</b> [1] 9/23<br/> <b>favoring</b> [1] 3/1<br/> <b>FBI</b> [9] 28/6 64/10 64/17 88/12 89/15 90/25 93/7 93/16 120/1<br/> <b>fear</b> [1] 93/7<br/> <b>FEBRUARY</b> [5] 1/12 9/6 117/6 122/10 122/20<br/> <b>Fed</b> [2] 8/10 11/12<br/> <b>federal</b> [3] 45/8 64/20 89/16<br/> <b>federally</b> [9] 16/22 16/23 17/1 34/21 34/24 35/6 37/13 37/14 37/24<br/> <b>federally-insured</b> [6] 17/1 34/21 34/24 37/13 37/14 37/24<br/> <b>feeding</b> [1] 28/19<br/> <b>fees</b> [3] 46/13 46/22 47/1<br/> <b>Feliciano</b> [1] 11/11<br/> <b>Feliciano-Franciso</b> [1] 11/11<br/> <b>fell</b> [4] 32/4 32/5 42/21 45/18<br/> <b>felt</b> [3] 32/6 84/8 102/19<br/> <b>few</b> [5] 29/16 31/1 45/12 53/1 118/7<br/> <b>Fifth</b> [3] 8/11 11/1 11/9<br/> <b>fighting</b> [1] 9/21<br/> <b>figure</b> [6] 24/22 28/16 44/10 113/20 115/6 120/12<br/> <b>figured</b> [3] 18/23 26/7 32/15<br/> <b>file</b> [2] 56/20 109/12<br/> <b>filed</b> [4] 1/5 1/11 1/13 15/25<br/> <b>files</b> [1] 57/11<br/> <b>filled</b> [4] 42/17 43/2 82/21 96/21<br/> <b>final</b> [1] 14/4<br/> <b>finalizing</b> [1] 22/15<br/> <b>finally</b> [12] 16/12 17/8 23/25 28/3 32/11 34/6 37/12 37/25 39/3 46/8 47/25 115/9<br/> <b>Finance</b> [1] 115/15<br/> <b>financial</b> [9] 16/24 17/2 27/17 37/14 38/5 38/15 39/22 40/6 40/9<br/> <b>find</b> [21] 24/16 34/18 37/3 37/10 39/15 40/8 42/12 42/13 49/23 49/24 53/21 71/5 75/5 83/8 83/8 83/12 98/3 100/2 100/20 103/8 103/21<br/> <b>findings</b> [3] 42/15 50/12 115/4<br/> <b>findings</b> [1] 3/22<br/> <b>fine</b> [2] 57/18 99/14<br/> <b>finished</b> [1] 79/17<br/> <b>finishing</b> [1] 22/2<br/> <b>first</b> [18] 2/19 4/7 5/17 7/12 17/13 31/4 32/21 35/13 38/4 39/21 51/1 61/13 63/15 89/20 95/15 109/2 111/11 118/4<br/> <b>five</b> [7] 4/12 4/13 4/13 104/8 104/8 104/9 104/11<br/> <b>five-day</b> [1] 4/13<br/> <b>five-hour</b> [1] 4/13<br/> <b>five-minute</b> [3] 4/12 104/8 104/8<br/> <b>fix</b> [3] 79/15 79/16 102/18<br/> <b>fixed</b> [1] 20/15<br/> <b>fixes</b> [2] 22/1 22/7<br/> <b>fixing</b> [1] 33/18<br/> <b>fledgling</b> [1] 76/24<br/> <b>fleshed</b> [1] 85/9<br/> <b>flow</b> [1] 69/5<br/> <b>follow</b> [1] 97/9<br/> <b>follow-up</b> [1] 97/9<br/> <b>followed</b> [2] 24/6 95/21<br/> <b>following</b> [2] 1/3 51/13<br/> <b>follows</b> [2] 49/9 104/17<br/> <b>food</b> [1] 45/21<br/> <b>fool</b> [1] 56/12<br/> <b>footnote</b> [1] 9/17<br/> <b>force</b> [1] 11/25<br/> <b>foregoing</b> [1] 122/17<br/> <b>forget</b> [1] 69/2 </p> | <p> <b>form</b> [16] 2/13 2/15 5/6 15/17 15/20 15/25 18/13 18/24 19/4 22/25 23/17 61/2 62/23 82/5 82/6 122/15<br/> <b>Form 941</b> [2] 15/25 19/4<br/> <b>Form 941s</b> [2] 22/25 23/17<br/> <b>formal</b> [1] 35/18<br/> <b>formalized</b> [1] 8/5<br/> <b>format</b> [1] 74/4<br/> <b>formed</b> [1] 94/5<br/> <b>forms</b> [9] 15/17 18/23 20/3 20/3 28/13 67/22 67/22 68/10 88/7<br/> <b>formula</b> [2] 24/23 25/2<br/> <b>forth</b> [5] 16/10 18/21 81/1 98/2 110/12<br/> <b>FOSTER</b> [201]<br/> <b>Foster's</b> [41] 3/11 3/13 3/15 18/24 19/11 20/22 26/1 26/4 26/8 26/21 27/3 27/8 27/25 28/4 29/9 30/15 30/17 30/21 31/12 38/9 49/14 56/2 56/18 57/3 61/18 73/2 73/9 75/5 97/16 106/4 106/5 106/6 106/13 107/22 108/16 110/13 111/20 111/25 112/16 114/8 114/24<br/> <b>found</b> [6] 13/11 18/12 47/14 56/11 61/6 95/21<br/> <b>foundation</b> [1] 3/4<br/> <b>founded</b> [1] 13/15<br/> <b>four</b> [6] 17/10 21/17 38/3 39/14 98/23 99/5<br/> <b>fourth</b> [1] 41/24<br/> <b>frame</b> [7] 26/13 26/22 27/11 27/15 30/23 111/21 115/18<br/> <b>framed</b> [3] 25/18 27/10 73/20<br/> <b>framing</b> [1] 27/20<br/> <b>Franciso</b> [1] 11/11<br/> <b>fraud</b> [64] 4/17 5/10 7/8 7/19 7/20 15/11 16/21 16/23 17/5 17/5 17/7 17/7 17/9 17/10 17/11 18/7 18/17 19/20 24/12 24/20 26/2 26/4 26/13 26/18 31/8 31/19 32/7 32/8 32/10 32/10 32/14 32/17 32/18 33/16 34/19 34/21 35/9 35/10 36/2 36/10 39/13 39/19 40/20 40/22 40/23 40/24 41/2 41/4 41/13 41/22 45/10 52/25 62/22 67/20 68/22 77/15 77/19 89/24 105/25 106/22 111/2 114/10 116/5 120/10<br/> <b>fraudsters</b> [1] 105/20<br/> <b>fraudulent</b> [19] 15/12 15/16 17/15 35/2 37/8 38/23 39/2 76/4 77/6 78/12 81/15 82/23 83/21 83/25 84/3 84/9 87/24 98/9 113/15<br/> <b>free</b> [1] 79/6<br/> <b>friend</b> [1] 92/14<br/> <b>friendly</b> [1] 3/19<br/> <b>front</b> [7] 5/18 10/7 11/4 11/6 11/10 56/4 85/1<br/> <b>fuck</b> [3] 83/4 113/25 114/8<br/> <b>full</b> [4] 1/12 47/23 93/9 111/4<br/> <b>fully</b> [1] 64/6<br/> <b>funds</b> [11] 50/3 52/20 52/23 68/17 80/7 80/20 97/4 97/8 98/12 99/1 100/1 </p> |
| <b>F</b> | <p> <b>fabricate</b> [1] 22/18<br/> <b>fabrication</b> [1] 16/9<br/> <b>Face</b> [1] 93/7<br/> <b>faced</b> [1] 91/1<br/> <b>facing</b> [3] 92/5 92/10 93/6<br/> <b>fact</b> [27] 13/11 31/13 31/23 32/8 32/12 32/24 32/25 33/1 35/3 40/10 41/3 42/9 42/10 52/15 54/2 55/1 66/14 68/8 75/4 82/2 100/4 100/6 100/7 108/11 112/2 118/24 118/24<br/> <b>factor</b> [2] 11/16 11/17<br/> <b>facts</b> [4] 3/16 3/21 6/2 72/20<br/> <b>factual</b> [2] 3/22 41/3 </p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            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                                                                                                                                                                                                                                                                             | <p> <b>G</b><br/> <b>Gaines</b> [100] 20/12 22/20 39/23 41/12 41/15 42/17 42/19 43/1 43/21 44/3 44/25 44/25 45/14 45/19 45/24 46/6 46/23 47/6 47/15 47/18 47/19 47/24 54/8 75/16 76/5 76/6 77/9 77/10 77/15 77/21 77/23 78/8 78/13 79/7 79/13 79/25 80/7 80/21 80/25 81/11 81/11 81/15 81/16 81/19 81/21 81/22 82/1 82/5 82/8 82/10 82/16 82/24 83/3 83/7 84/1 84/21 85/3 85/5 85/6 85/11 86/2 86/5 86/24 87/19 90/11 90/23 94/3 94/9 94/16 95/3 95/4 96/5 96/9 96/19 96/20 97/4 97/5 98/11 99/9 101/15 101/20 102/12 102/14 102/25 103/2 103/12 105/18 116/7 116/25 117/15 117/21 117/23 118/15 118/20 118/21 118/22 118/25 119/3 120/1 120/18<br/> <b>Gaines's</b> [3] 42/22 86/8 117/19<br/> <b>gamesmanship</b> [2] 10/8 10/9<br/> <b>gand.uscourts.gov</b> [1] 1/25<br/> <b>garage</b> [1] 87/16 </p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      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| <b>G</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>got [42]</b> 10/14 13/12 16/15 18/17 18/25 19/1 19/8 19/9 20/10 24/15 27/5 28/5 28/13 31/25 32/2 38/14 43/15 44/7 45/20 64/19 64/21 69/23 75/21 79/11 79/18 85/11 86/4 87/1 88/4 88/24 89/11 91/15 94/4 95/16 95/20 111/11 111/12 114/3 114/7 116/9 118/19 118/25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Hazel [1]</b> 113/13<br><b>he [345]</b><br><b>he's [14]</b> 6/14 17/4 17/8 18/3 44/4 44/5 44/16 49/24 54/3 56/7 82/12 88/12 88/15 91/2<br><b>head [12]</b> 77/4 99/20<br><b>hear [17]</b> 11/8 11/13 15/1 15/2 15/3 28/11 29/11 29/13 30/13 38/3 45/1 82/1 105/10 105/11 105/17 105/22 119/12<br><b>heard [74]</b> 7/17 11/20 15/12 15/24 16/15 17/2 17/23 19/11 19/12 19/15 19/19 24/2 24/10 24/11 24/20 28/18 28/25 29/1 29/7 29/15 29/23 29/24 31/2 31/5 31/15 31/25 32/2 33/2 33/15 34/10 35/5 37/23 38/8 38/12 40/6 41/15 41/16 42/16 42/18 43/6 43/15 43/21 43/25 44/3 45/10 54/5 54/7 54/7 62/4 65/15 69/13 76/1 80/4 81/1 81/5 90/17 98/5 101/17 109/5 111/9 113/13 113/22 114/3 115/9 115/10 115/12 115/14 115/16 115/25 116/6 116/25 117/1 119/8 119/11<br><b>hearing [45]</b> 80/3 80/14 80/18 122/15<br><b>heart [1]</b> 35/19<br><b>held [1]</b> 122/10<br><b>hell [1]</b> 18/15<br><b>help [6]</b> 21/22 24/20 24/24 32/16 115/6 117/16<br><b>helped [14]</b> 16/18 18/19 22/18 38/22<br><b>helpful [2]</b> 72/12 86/13<br><b>helping [1]</b> 111/1<br><b>her [80]</b> 2/8 21/22 22/13 22/13 24/15 24/21 24/24 26/23 27/5 28/10 39/23 39/24 42/14 42/17 42/19 43/6 43/15 43/16 44/4 44/5 44/19 44/20 45/1 46/20 46/23 46/24 47/15 47/21 47/21 47/24 48/3 51/1 63/8 63/9 66/24 75/21 75/23 76/3 77/6 77/13 78/5 78/10 78/11 78/12 78/15 79/22 84/10 90/24 90/25 97/8 97/9 98/8 99/4 99/7 100/25 101/8 106/6 109/24 111/22 115/16 116/13 116/15 116/16 116/18 116/18 117/2 117/15 117/16 117/17 119/3 119/14 119/15 119/16 119/17 120/5 120/13 120/13 120/14 120/16 120/18<br><b>here [63]</b> 3/12 3/16 4/11 4/17 7/7 7/9 8/9 8/16 9/2 9/15 9/16 10/8 10/24 12/18 17/22 33/1 34/8 34/11 34/23 35/25 36/6 39/6 40/17 41/17 47/9 58/3 59/4 60/11 60/18 63/12 69/24 72/1 75/6 78/15 79/14 79/15 81/3 81/6 81/7 81/22 82/4 82/10 82/12 82/13 82/14 88/2 93/18 98/17 99/24 100/3 100/8 101/25 102/12 102/15 102/15 102/18 102/20 104/12 106/14 114/21 120/14 120/17 121/9<br><b>Here's [1]</b> 58/16<br><b>hereby [2]</b> 36/2 122/7<br><b>hers [1]</b> 40/3<br><b>herself [3]</b> 106/16 117/1 119/25<br><b>hesitation [4]</b> 97/23 97/24 98/3 98/4<br><b>hey [6]</b> 12/8 12/13 52/6 59/7 82/15 97/12<br><b>hid [1]</b> 78/8<br><b>hidden [1]</b> 120/16<br><b>hide [11]</b> 47/6 47/24 86/23 92/13 99/8 109/1 116/15 116/16 116/18 118/21 118/24<br><b>hiding [1]</b> 85/4<br><b>high [3]</b> 42/9 88/16 100/6<br><b>higher [1]</b> 70/18<br><b>highest [3]</b> 70/21 100/22 102/24<br><b>highly [1]</b> 78/18<br><b>him [107]</b> 6/10 6/17 12/9 12/17 12/18 12/23 12/24 13/4 19/2 19/10 19/12 19/13 19/15 19/17 19/19 20/7 20/9 22/20 22/21 23/11 23/15 24/20 24/21 24/24 25/2 26/2 26/10 26/13 26/22 27/15 27/15 27/16 28/1 28/18 28/19 30/22 30/24 32/6 32/12 32/16 33/15 37/3 38/8 38/10 38/12 38/15 45/2 45/3 45/20 45/22 47/4 53/21 54/8 54/10 54/19 54/20 54/22 54/23 54/24 55/15 56/16 64/17 64/18 65/15 65/17 65/23 66/16 67/13 67/14 67/22 69/17 |
| <b>gave [11]</b> 6/17 25/1 25/2 28/12 44/4 44/15 44/21 51/17 93/10 119/3 119/16<br><b>GEICO [1]</b> 94/18<br><b>Gena [87]</b> 21/8 21/21 22/1 22/6 22/12 23/1 24/7 24/10 24/19 25/1 25/12 25/13 25/17 25/25 26/7 26/21 28/5 30/20 31/5 31/7 31/10 38/9 38/17 39/6 51/1 51/3 51/7 51/14 51/17 51/19 51/22 51/23 52/4 52/6 53/2 54/16 57/7 57/20 58/20 58/23 58/24 59/1 59/15 60/3 60/14 60/22 61/2 61/6 61/13 61/17 61/20 62/9 62/15 62/18 63/1 63/5 64/10 65/2 65/18 65/19 65/19 65/24 65/25 66/14 66/20 66/23 72/16 72/17 73/2 105/18 106/5 106/12 108/24 110/4 110/15 110/20 111/14 111/18 112/3 112/14 112/16 112/24 113/1 113/6 113/10 114/24 115/6<br><b>Gena's [10]</b> 25/10 38/13 38/15 63/7 65/9 65/11 72/22 72/24 73/9 115/4<br><b>general [5]</b> 7/11 7/15 7/23 8/19 37/1<br><b>generally [1]</b> 4/22<br><b>gentlemen [4]</b> 14/23 47/25 107/12 120/25<br><b>GEORGIA [6]</b> 1/1 1/24 34/12 41/18 41/20 122/7<br><b>get [66]</b> 6/22 6/22 7/4 10/20 14/7 16/18 18/23 19/13 19/20 30/17 31/22 32/3 32/3 32/14 32/16 33/16 33/24 35/25 37/8 38/17 38/22 48/15 49/2 61/18 64/23 66/15 68/4 68/12 68/25 69/20 72/24 73/1 73/3 73/3 73/5 73/8 73/14 74/13 77/2 78/19 78/23 79/3 82/14 83/13 83/21 83/25 84/17 89/4 91/9 91/10 92/19 93/14 95/18 98/8 98/16 101/10 101/11 102/5 103/17 104/6 105/19 106/19 113/14 113/17 114/10 117/16<br><b>get-go [1]</b> 66/15<br><b>gets [2]</b> 52/7 81/19<br><b>getting [7]</b> 14/9 33/3 33/6 43/8 67/11 99/10 113/22<br><b>gig [1]</b> 83/21<br><b>girlfriend [2]</b> 106/4 106/22<br><b>give [24]</b> 3/7 9/25 11/18 13/19 24/21 24/24 32/13 42/5 52/7 74/24 78/14 78/15 89/22 89/25 90/2 93/9 95/17 100/8 100/12 103/4 114/7 119/2 119/6 121/3<br><b>given [2]</b> 51/18 93/11<br><b>gives [1]</b> 106/6<br><b>giving [2]</b> 14/3 92/11<br><b>go [41]</b> 2/8 7/18 12/20 22/4 35/25 39/19 49/12 51/16 51/20 66/15 66/18 69/1 79/24 79/24 81/21 84/11 85/9 86/1 87/13 87/15 87/25 90/1 93/17 96/15 96/15 97/15 98/23 98/24 99/13 99/15 100/2 102/2 102/21 105/6 107/12 110/12 112/16 116/21 117/4 117/15 119/16<br><b>goalposts [1]</b> 114/20<br><b>goals [1]</b> 71/10<br><b>God [1]</b> 91/3<br><b>goes [5]</b> 5/4 20/21 21/1 21/4 84/24<br><b>going [66]</b> 4/20 5/3 6/3 6/7 6/14 6/24 10/24 15/1 16/10 23/14 26/2 27/17 36/3 38/1 42/5 43/16 46/1 47/12 48/3 49/16 50/4 57/11 58/19 63/12 64/6 68/3 71/16 80/8 80/9 80/10 81/5 85/9 85/12 87/14 90/10 90/12 90/14 90/16 91/8 91/10 93/1 93/17 97/12 98/13 98/24 99/11 101/9 102/17 103/8 103/14 104/4 104/11 107/2 107/3 110/12 112/14 112/23 112/25 114/6 114/6 114/14 114/16 118/6 118/14 118/14 120/25<br><b>gone [2]</b> 6/21 85/23<br><b>good [12]</b> 2/4 14/23 14/24 15/7 15/8 24/18 61/5 78/7 88/14 89/9 100/9 100/17<br><b>goods [1]</b> 89/11<br><b>Google [5]</b> 68/1 68/2 68/2 68/4 85/22<br><b>Googled [1]</b> 63/23<br><b>Googling [1]</b> 113/19 | <b>government [86]</b> 1/16 3/10 5/15 9/6 9/9 9/19 10/18 11/6 11/25 12/1 13/9 13/11 13/25 15/2 17/20 33/18 35/15 35/21 49/25 50/18 50/20 52/12 53/1 53/13 53/16 53/18 53/22 54/9 55/3 55/23 56/5 57/18 58/19 59/12 59/22 60/2 60/16 61/24 62/5 62/9 63/13 63/18 63/23 64/21 67/10 68/14 69/4 69/10 70/6 71/1 71/21 71/21 72/3 72/10 72/15 72/16 73/8 75/16 78/16 78/21 80/2 80/14 81/22 82/13 82/19 83/11 84/7 84/23 85/15 86/7 86/25 88/4 92/23 94/24 95/12 98/2 98/19 99/16 99/24 101/18 102/11 102/16 103/1 103/11 103/13 103/22<br><b>government's [20]</b> 2/24 9/5 9/17 11/14 15/6 49/17 56/22 57/7 60/15 60/23 70/10 72/8 77/14 82/25 83/15 88/1 101/3 102/3 107/13 116/22<br><b>grand [2]</b> 89/16 95/12<br><b>grant [5]</b> 4/20 11/25 12/1 12/9 12/21<br><b>granting [1]</b> 4/11<br><b>great [2]</b> 31/7 61/6<br><b>greatest [1]</b> 85/17<br><b>ground [1]</b> 42/24<br><b>Group [5]</b> 18/18 39/1 63/4 63/16 111/11<br><b>grow [1]</b> 76/14<br><b>growing [1]</b> 91/16<br><b>grown [1]</b> 91/15<br><b>guarantee [1]</b> 8/2<br><b>guard [1]</b> 119/23<br><b>guess [1]</b> 101/2<br><b>guiding [1]</b> 8/9<br><b>guilty [20]</b> 34/18 37/3 37/11 39/15 45/7 48/21 49/23 49/24 50/5 50/7 52/24 53/21 54/4 56/7 75/10 79/8 79/10 103/22 117/24 120/20<br><b>guy [2]</b> 22/2 68/24<br><b>guys [1]</b> 33/25 | <b>H</b><br><b>hack [1]</b> 26/8<br><b>hacked [1]</b> 25/25<br><b>hacking [2]</b> 29/1 29/8<br><b>had [167]</b><br><b>Hair [1]</b> 59/7<br><b>half [3]</b> 15/19 104/5 104/22<br><b>halt [1]</b> 42/24<br><b>hand [2]</b> 28/25 53/7<br><b>handed [1]</b> 89/21<br><b>handling [1]</b> 90/16<br><b>handwriting [1]</b> 39/24<br><b>handwritten [1]</b> 87/20<br><b>happen [1]</b> 89/18 118/14<br><b>happened [17]</b> 6/20 9/10 10/16 13/8 25/13 28/8 28/9 45/6 50/19 52/9 55/22 60/3 74/7 74/9 84/8 113/1 116/9<br><b>happening [4]</b> 52/2 52/18 106/10 112/12<br><b>happens [6]</b> 71/13 73/13 74/6 107/24 108/1 112/22<br><b>Happy [1]</b> 14/25<br><b>hard [2]</b> 14/9 86/16<br><b>has [44]</b> 1/11 2/7 7/22 9/3 9/5 14/4 15/9 17/9 25/17 41/5 41/15 43/3 49/18 49/25 50/18 52/12 60/2 61/22 61/24 63/18 70/6 70/10 71/1 71/15 71/21 76/2 76/18 77/10 79/8 81/13 86/7 87/9 88/4 88/11 88/14 88/24 88/25 90/22 91/1 93/13 98/2 103/22 105/15 115/1<br><b>have [225]</b><br><b>haven't [6]</b> 52/19 52/21 60/10 60/13 67/3 67/4<br><b>having [9]</b> 2/22 9/20 11/11 26/10 30/22 35/22 89/7 97/3 97/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>H</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | iCloud.com [7] 29/12 29/18 57/17<br>58/2 58/14 58/17 59/21                                                                                                                                               | instance [1] 5/7                                                                                                                                                                                                                                                                               |
| him... [36] 72/2 74/3 74/11 74/12<br>75/17 78/14 79/13 80/11 82/3 82/14<br>83/7 83/8 83/8 83/12 83/15 84/20<br>84/21 85/3 85/3 85/5 85/13 85/20<br>86/25 91/9 93/4 94/17 96/12 106/16<br>107/7 111/1 111/2 116/10 118/2 118/4<br>119/11 119/15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | idea [12] 6/7 18/24 26/10 27/19<br>30/22 61/22 63/5 66/11 69/22 95/19<br>106/20 119/22                                                                                                                   | instances [2] 109/25 110/2                                                                                                                                                                                                                                                                     |
| himself [3] 33/15 38/22 106/25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | ideal [1] 100/16                                                                                                                                                                                         | instant [1] 91/7                                                                                                                                                                                                                                                                               |
| hindsight [2] 11/2 11/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | identical [10] 15/20 16/5 16/8 20/3<br>20/13 21/12 21/24 22/8 22/24 25/3                                                                                                                                 | instead [13] 3/15 10/13 18/2 26/12<br>26/13 26/25 34/24 36/4 86/15 89/7<br>89/13 105/23 115/21                                                                                                                                                                                                 |
| hire [3] 68/12 90/14 112/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | identification [1] 107/18                                                                                                                                                                                | institution [4] 16/24 17/2 37/15<br>37/20                                                                                                                                                                                                                                                      |
| his [113] 3/21 11/1 11/9 16/20 19/9<br>19/19 20/2 26/8 26/9 26/9 26/10 27/8<br>28/1 28/2 28/16 30/3 30/3 30/5 30/15<br>30/16 30/23 31/14 31/21 31/21 32/4<br>32/6 33/17 34/11 38/14 45/7 45/10<br>45/10 46/5 46/24 47/16 47/19 52/13<br>54/9 54/18 54/18 55/12 55/12 56/11<br>56/20 56/23 57/5 57/8 60/17 61/7<br>61/22 62/6 62/7 64/5 64/18 64/25<br>65/3 65/5 68/22 68/24 68/25 72/14<br>74/13 77/11 77/12 78/8 78/9 78/9<br>79/9 79/21 79/22 80/3 80/4 80/13<br>80/13 80/18 81/1 84/2 84/14 84/19<br>84/19 85/12 85/20 86/5 87/20 88/13<br>89/21 94/16 98/12 100/25 102/19<br>103/16 103/16 106/5 106/10 106/11<br>106/16 106/20 106/21 106/22 106/22<br>107/7 107/9 107/10 107/11 108/22<br>109/10 111/8 115/1 115/2 115/2 115/3<br>118/2 119/11 | identify [4] 9/18 74/2 74/13 110/5                                                                                                                                                                       | instruct [8] 16/25 17/9 31/3 35/15<br>35/19 36/13 36/24 40/5                                                                                                                                                                                                                                   |
| history [2] 45/10 81/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | identifying [2] 74/16 74/17                                                                                                                                                                              | instructing [2] 3/12 9/17                                                                                                                                                                                                                                                                      |
| hitting [1] 108/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | identities [1] 36/15                                                                                                                                                                                     | instruction [22] 3/3 3/7 3/12 3/14<br>6/15 8/13 8/15 9/25 11/18 25/20 42/5<br>92/19 96/13 97/15 98/25 99/15 99/17<br>99/22 100/11 100/23 102/23 104/20                                                                                                                                         |
| hold [1] 59/23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | identity [2] 29/17 92/11                                                                                                                                                                                 | instructions [12] 2/8 3/24 4/1 4/3<br>14/2 14/5 95/18 97/17 101/18 114/15<br>121/3 121/4                                                                                                                                                                                                       |
| Holdings [2] 21/4 21/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | ignorance [3] 98/25 99/15 100/17                                                                                                                                                                         | Insurance [1] 94/18                                                                                                                                                                                                                                                                            |
| home [3] 34/11 86/14 108/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | ignore [7] 28/4 67/12 67/21 67/24<br>68/8 68/15 68/16                                                                                                                                                    | insured [9] 16/22 16/24 17/1 34/21<br>34/24 35/7 37/13 37/14 37/24                                                                                                                                                                                                                             |
| Honor [21] 4/24 5/18 6/5 6/16 8/1<br>11/20 11/23 11/24 13/4 13/10 13/22<br>14/16 14/18 15/5 48/23 49/13 75/13<br>104/3 104/24 104/25 105/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | ignoring [1] 101/2                                                                                                                                                                                       | intended [2] 17/18 52/10                                                                                                                                                                                                                                                                       |
| HONORABLE [1] 1/11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | ill [1] 13/15                                                                                                                                                                                            | intent [11] 3/25 33/15 34/5 35/3<br>37/19 37/19 37/20 50/1 50/17 52/19<br>52/22                                                                                                                                                                                                                |
| hope [4] 2/5 49/19 72/9 121/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | illegal [11] 41/8 41/25 43/6 43/8<br>43/9 43/11 44/16 44/22 47/23 63/12<br>100/1                                                                                                                         | intentionally [6] 18/2 18/4 38/7<br>50/8 50/14 52/17                                                                                                                                                                                                                                           |
| hopelessly [1] 45/11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | illegality [2] 41/10 97/4                                                                                                                                                                                | interaction [1] 74/2                                                                                                                                                                                                                                                                           |
| hoping [1] 26/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | image [1] 85/21                                                                                                                                                                                          | interactions [3] 82/7 82/7 82/9                                                                                                                                                                                                                                                                |
| hour [2] 4/13 104/4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | IMEI [1] 107/17                                                                                                                                                                                          | interchangeably [1] 109/6                                                                                                                                                                                                                                                                      |
| house [10] 70/1 70/15 72/24 73/2<br>89/3 96/6 96/6 106/21 114/24 115/4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | immediately [5] 18/17 20/22 27/6<br>87/13 108/2                                                                                                                                                          | interested [1] 89/23                                                                                                                                                                                                                                                                           |
| how [61] 4/22 4/25 7/4 18/17 19/3<br>19/6 21/15 21/23 22/17 23/2 24/13<br>25/5 25/6 25/7 25/16 26/8 27/8 28/11<br>28/12 28/13 28/14 28/16 30/4 30/10<br>33/2 33/4 34/1 36/5 37/4 40/24 43/18<br>44/4 61/18 64/12 69/15 73/20 88/13<br>88/13 88/17 89/8 90/18 92/7 92/20<br>92/25 93/11 93/11 101/16 103/25<br>106/19 107/4 107/5 110/10 111/3<br>111/3 111/4 112/5 112/6 112/11<br>112/11 113/4 113/20                                                                                                                                                                                                                                                                                                                                               | immunity [23] 4/12 4/20 5/1 5/2 5/6<br>5/7 5/13 5/13 5/23 6/18 7/21 7/21<br>7/24 8/3 8/4 9/10 10/20 11/25 12/1<br>12/9 12/11 12/14 12/21                                                                 | interesting [1] 21/8                                                                                                                                                                                                                                                                           |
| however [2] 1/12 5/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | impact [5] 20/5 20/10 58/2 58/8 75/1                                                                                                                                                                     | interests [1] 71/10                                                                                                                                                                                                                                                                            |
| huge [1] 60/15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | impeach [1] 84/14                                                                                                                                                                                        | intermediary [1] 81/10                                                                                                                                                                                                                                                                         |
| hullabaloo [3] 87/8 87/22 95/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | impeached [2] 79/2 79/4                                                                                                                                                                                  | interstate [3] 34/7 34/9 34/16                                                                                                                                                                                                                                                                 |
| hunch [1] 70/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | impermissible [1] 3/18                                                                                                                                                                                   | interview [18] 28/11 38/13 64/3 64/7<br>65/9 84/19 84/25 85/10 92/24 102/6<br>103/10 107/2 109/5 112/6 117/2<br>118/18 119/9 119/12                                                                                                                                                            |
| hunches [3] 86/16 99/3 101/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | implications [1] 99/4                                                                                                                                                                                    | interviewed [5] 13/4 64/10 65/23<br>66/16 66/19                                                                                                                                                                                                                                                |
| hundred [1] 112/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | implies [1] 95/20                                                                                                                                                                                        | interviews [3] 48/18 79/1 119/11                                                                                                                                                                                                                                                               |
| hundred-plus [1] 112/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | important [21] 10/22 17/22 32/24<br>33/1 33/10 40/16 42/5 45/7 47/8<br>70/12 70/14 82/1 86/11 86/12 91/22<br>97/18 97/20 97/24 98/17 100/23<br>103/18                                                    | intimidate [1] 119/15                                                                                                                                                                                                                                                                          |
| hundreds [3] 28/16 109/25 110/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | importantly [1] 121/5                                                                                                                                                                                    | intimidated [1] 119/23                                                                                                                                                                                                                                                                         |
| husband [5] 43/8 44/15 44/21 117/16<br>120/5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | impose [1] 114/21                                                                                                                                                                                        | introduced [1] 62/18                                                                                                                                                                                                                                                                           |
| hustled [1] 68/23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | impossible [1] 23/21                                                                                                                                                                                     | investigate [1] 5/15                                                                                                                                                                                                                                                                           |
| hypothetical [1] 6/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | improper [1] 8/16                                                                                                                                                                                        | investigating [1] 89/24                                                                                                                                                                                                                                                                        |
| hypothetically [1] 6/5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | included [1] 4/2                                                                                                                                                                                         | investigation [2] 75/1 116/2                                                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | including [1] 121/7                                                                                                                                                                                      | investment [1] 27/23                                                                                                                                                                                                                                                                           |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | incomplete [4] 72/9 73/11 95/20<br>97/13                                                                                                                                                                 | invited [2] 9/7 10/9                                                                                                                                                                                                                                                                           |
| <b>I</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | inconsistency [1] 2/25                                                                                                                                                                                   | invocation [1] 11/9                                                                                                                                                                                                                                                                            |
| I'll [9] 6/8 7/8 34/7 38/6 39/17<br>39/19 52/7 78/14 84/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | inconsistent [1] 78/25                                                                                                                                                                                   | invoke [1] 10/25                                                                                                                                                                                                                                                                               |
| I'm [23] 13/19 14/3 27/21 38/1 59/15<br>66/3 73/12 75/3 75/3 81/5 85/9 88/22<br>93/17 97/12 98/13 98/24 101/9 103/1<br>103/8 103/14 104/11 113/9 117/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | incorrect [2] 13/23 13/24                                                                                                                                                                                | invokes [1] 119/20                                                                                                                                                                                                                                                                             |
| I've [1] 93/20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | incorrectly [1] 55/24                                                                                                                                                                                    | involved [43] 5/11 9/19 12/19 17/23<br>24/13 25/14 26/18 27/2 27/18 31/4<br>31/13 31/16 31/19 31/23 34/7 34/16<br>38/19 50/11 52/16 53/2 58/21 58/23<br>63/13 63/14 63/16 64/1 66/15 69/8<br>69/22 70/23 74/18 77/16 78/6 81/17<br>83/25 89/25 96/11 98/9 105/24 110/11<br>110/23 111/14 116/5 |
| I.D [1] 77/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | incredible [1] 84/16                                                                                                                                                                                     | involvement [4] 16/20 31/12 31/14<br>65/11                                                                                                                                                                                                                                                     |
| IBM [1] 75/20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | incredibly [1] 28/6                                                                                                                                                                                      | involving [1] 4/5                                                                                                                                                                                                                                                                              |
| iCloud [17] 20/2 21/11 23/3 24/8<br>26/9 26/22 29/5 29/20 30/16 57/22<br>57/23 58/9 59/19 73/6 110/2 110/10<br>110/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | incriminating [1] 86/14                                                                                                                                                                                  | IP [6] 73/2 73/4 96/7 114/23 114/24<br>115/4                                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | indeed [2] 3/1 9/22                                                                                                                                                                                      | ironic [2] 65/22 66/7                                                                                                                                                                                                                                                                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | indicated [1] 56/23                                                                                                                                                                                      | irresponsible [1] 6/19                                                                                                                                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | indication [1] 74/12                                                                                                                                                                                     | IRS [16] 15/24 19/9 21/16 27/9 65/18<br>65/24 65/25 66/5 66/11 66/12 113/11<br>113/13 113/16 113/16 113/18 113/20                                                                                                                                                                              |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | indicted [4] 9/20 64/12 67/1 116/3                                                                                                                                                                       | isn't [6] 3/12 74/6 74/7 74/8 94/21<br>96/18                                                                                                                                                                                                                                                   |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | influence [1] 37/19                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                |
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|                                             |                                             |                                             |
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| <b>itself [1]</b> 35/20                     | <b>keyboard [1]</b> 54/23                   | <b>let's [26]</b> 7/6 13/18 49/21 56/5      |
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| 83/25 84/10 84/21 84/24 87/3 87/23          | 36/18 36/18 36/21 38/18 38/21 39/4          | 98/3 98/22 101/8 102/23 102/24              |
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| <b>jello [1]</b> 118/3                      | 84/21 84/22 86/16 87/3 93/1 94/11           | 90/25 98/8 101/8                            |
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| 50/15 53/16 59/2 59/7 63/6 64/2 66/2        | <b>legit [1]</b> 34/3                       | 57/3                                        |
| 67/6 68/2 73/16 73/22 74/24 77/5            | <b>legitimate [11]</b> 22/4 63/11 64/18     | <b>logging [1]</b> 57/16                    |
| 81/6 85/1 85/8 87/9 87/22 92/15             | 68/24 83/17 84/4 111/1 113/21 116/13        | <b>login [1]</b> 73/3                       |
| 93/23 95/6 96/17 98/13 98/20 98/25          | 116/21 117/16                               | <b>logins [1]</b> 73/4                      |
| 99/3 103/10 106/10 107/24 108/1             | <b>legitimately [1]</b> 73/24               | <b>LOL [3]</b> 20/18 24/14 27/5             |
| 114/10 119/18 119/24 120/5                  | <b>Leigh [1]</b> 1/19                       | <b>long [13]</b> 4/22 7/4 10/5 38/7 44/9    |
| <b>justice [4]</b> 4/17 5/4 6/22 10/2       | <b>lender [3]</b> 16/21 33/10 37/20         | 44/24 45/9 45/10 48/16 54/9 88/12           |

|                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>L</b>                                                                                                                                                                                                                                                                      | 102/7 108/12 114/9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>morning [11]</b> 2/4 2/17 4/7 9/5 14/23<br>14/24 15/7 15/8 88/21 88/22 90/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>look [38]</b> 2/8 2/11 14/4 21/10 22/4<br>33/17 34/3 36/4 46/18 48/1 48/16<br>56/19 59/23 59/24 62/3 62/21 67/10<br>80/16 92/15 93/10 100/2 100/10<br>103/12 107/3 107/3 107/13 107/15<br>110/12 112/8 112/17 113/15 113/20<br>115/7 116/22 117/25 120/13 120/13<br>120/13 | <b>means [12]</b> 10/17 17/18 17/25 32/24<br>35/10 40/20 42/11 49/25 70/18 82/23<br>95/17 114/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>most [7]</b> 9/23 45/6 70/12 97/20 97/24<br>98/17 100/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>looked [4]</b> 26/17 27/16 85/24 86/10                                                                                                                                                                                                                                     | <b>meant [4]</b> 2/14 39/7 79/20 91/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>mouth [1]</b> 3/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>looking [3]</b> 27/1 77/4 111/23                                                                                                                                                                                                                                           | <b>medical [2]</b> 81/1 82/3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>move [8]</b> 2/18 39/17 86/23 87/1 93/13<br>93/14 98/12 114/20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>losing [1]</b> 76/16                                                                                                                                                                                                                                                       | <b>meet [1]</b> 70/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>moved [3]</b> 16/17 19/23 99/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>lot [10]</b> 24/10 31/5 31/15 31/25<br>71/15 73/24 74/6 80/2 102/9 108/4                                                                                                                                                                                                   | <b>meeting [5]</b> 88/5 88/24 89/1 90/4<br>102/4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>moves [2]</b> 19/1 68/4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>lots [2]</b> 24/3 24/4                                                                                                                                                                                                                                                     | <b>meetings [1]</b> 79/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>moving [3]</b> 43/9 43/10 116/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>love [1]</b> 78/16                                                                                                                                                                                                                                                         | <b>members [2]</b> 35/17 85/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Mr. [77]</b> 3/11 3/13 3/15 3/24 4/20<br>6/4 6/6 6/9 8/2 10/25 12/2 12/2<br>12/11 17/11 17/13 17/24 28/4 29/15<br>33/14 34/8 34/18 34/20 35/8 36/11<br>36/25 37/11 37/13 37/25 42/22 43/1<br>49/23 50/17 52/24 53/13 54/10 56/2<br>56/6 56/23 57/3 67/1 71/6 71/25 72/1<br>73/9 75/12 77/10 77/15 77/23 79/7<br>79/13 80/7 81/3 81/19 83/7 85/11<br>87/19 94/3 94/9 96/9 97/16 102/14<br>105/1 106/2 106/4 106/5 106/16<br>109/14 112/18 116/21 116/25 117/19<br>117/20 117/21 118/4 118/18 120/7<br>120/24                                                            |
| <b>low [4]</b> 76/23 88/5 102/7 102/8                                                                                                                                                                                                                                         | <b>message [6]</b> 24/14 26/15 27/4 27/6<br>66/2 110/16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Mr. Berne [1]</b> 12/11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>lower [1]</b> 79/6                                                                                                                                                                                                                                                         | <b>messages [22]</b> 26/16 26/17 46/23<br>51/12 54/18 54/25 58/24 58/25 60/13<br>61/17 62/1 65/4 66/22 67/2 86/5<br>86/19 86/19 96/24 96/24 110/1 110/18<br>111/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Mr. Dixon [6]</b> 4/20 6/4 6/6 6/9 8/2<br>10/25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>lucky [1]</b> 28/6                                                                                                                                                                                                                                                         | <b>messed [1]</b> 102/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Mr. Dixon's [1]</b> 12/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>ludicrous [5]</b> 66/15 66/16 66/17<br>72/16 72/17                                                                                                                                                                                                                         | <b>messing [1]</b> 113/3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Mr. Foster [28]</b> 3/24 17/11 17/13<br>17/24 33/14 34/8 34/18 34/20 35/8<br>36/11 36/25 37/11 37/13 37/25 49/23<br>50/17 52/24 53/13 54/10 56/6 56/23<br>67/1 71/6 71/25 72/1 81/3 106/2<br>106/16                                                                                                                                                                                                                                                                                                                                                                    |
| <b>lunch [5]</b> 104/6 104/7 121/1 121/8<br>121/12                                                                                                                                                                                                                            | <b>met [1]</b> 103/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Mr. Foster's [10]</b> 3/11 3/13 3/15<br>28/4 56/2 57/3 73/9 97/16 106/4<br>106/5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>lying [2]</b> 80/17 117/15                                                                                                                                                                                                                                                 | <b>metadata [3]</b> 65/20 112/15 112/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Mr. Gaines [17]</b> 43/1 77/10 77/15<br>77/23 79/7 79/13 80/7 81/19 83/7<br>85/11 87/19 94/3 94/9 96/9 102/14<br>116/25 117/21                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>M</b>                                                                                                                                                                                                                                                                      | <b>Metadore [1]</b> 59/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Mr. Gaines's [2]</b> 42/22 117/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>machine [1]</b> 122/9                                                                                                                                                                                                                                                      | <b>Mickies [1]</b> 23/25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Mr. Kaushal [1]</b> 112/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>made [25]</b> 6/25 11/7 19/2 20/10 27/14<br>27/24 35/17 46/20 50/5 51/15 52/22<br>54/3 60/14 73/19 75/1 80/14 84/19<br>85/16 86/2 101/5 102/9 106/2 107/17<br>115/10 116/20                                                                                                | <b>middle [4]</b> 5/23 6/23 60/7 60/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Mr. Marshall [8]</b> 75/12 105/1 116/21<br>117/20 118/4 118/18 120/7 120/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>made-up [1]</b> 85/16                                                                                                                                                                                                                                                      | <b>might [6]</b> 32/15 56/24 82/2 89/2<br>89/24 91/3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Mr. Persinger [2]</b> 29/15 109/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>main [3]</b> 4/17 5/4 6/22                                                                                                                                                                                                                                                 | <b>miles [1]</b> 107/25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Mr. Ricky [1]</b> 12/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>make [34]</b> 2/9 2/11 11/20 12/15 12/18<br>12/22 19/10 25/21 40/1 46/24 52/6<br>52/7 57/9 64/3 76/19 78/6 78/21<br>80/15 83/22 91/6 91/7 92/7 92/15<br>94/20 101/8 106/11 107/3 107/3 108/3<br>111/23 112/8 112/13 113/6 113/20                                           | <b>million [2]</b> 15/15 69/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Ms. [84]</b> 2/7 3/17 4/8 9/22 11/22<br>13/3 13/19 15/4 28/10 31/6 38/3<br>39/21 40/25 41/6 41/24 42/6 42/13<br>42/16 43/25 44/10 44/25 45/12 45/25<br>46/8 46/19 47/10 48/1 48/7 49/12<br>54/8 75/17 75/22 76/10 76/25 77/25<br>78/15 79/18 80/24 81/18 82/21 84/10<br>84/21 87/3 88/22 90/7 91/11 92/25<br>93/10 94/2 94/21 95/2 95/16 95/25<br>97/3 97/6 97/9 97/21 98/2 99/12<br>101/9 102/13 103/21 103/25 105/6<br>106/2 106/8 109/12 109/22 110/20<br>111/9 111/10 111/17 112/1 112/14<br>113/8 114/12 116/8 117/1 118/10<br>118/18 119/13 120/17 120/23 120/24 |
| <b>makes [8]</b> 11/17 26/5 26/20 27/11<br>30/25 35/23 60/6 113/15                                                                                                                                                                                                            | <b>millions [1]</b> 114/3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Ms. Chaiken [11]</b> 3/17 4/8 9/22 13/19<br>15/4 75/22 78/15 79/18 103/25 105/6<br>120/23                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>making [10]</b> 22/15 25/8 28/7 35/20<br>37/13 50/1 50/6 107/11 107/21 117/25                                                                                                                                                                                              | <b>mind [4]</b> 44/3 44/6 67/7 103/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Ms. Durrett [2]</b> 11/22 13/3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>man [5]</b> 78/5 79/18 79/19 79/19 83/21                                                                                                                                                                                                                                   | <b>mine [2]</b> 81/23 92/4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Ms. Jackson [48]</b> 38/3 39/21 40/25<br>41/24 42/6 42/13 42/16 43/25 44/10<br>44/25 45/12 46/8 46/19 47/10 48/1<br>48/7 54/8 76/10 76/25 77/25 80/24<br>81/18 82/21 84/10 84/21 87/3 88/22<br>91/11 92/25 93/10 94/2 94/21 95/2<br>95/16 95/25 97/3 97/6 97/9 98/2<br>99/12 101/9 102/13 103/21 116/8<br>117/1 118/10 119/13 120/17                                                                                                                                                                                                                                   |
| <b>manage [1]</b> 46/17                                                                                                                                                                                                                                                       | <b>minor [3]</b> 36/25 95/13 104/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Ms. Jackson's [5]</b> 41/6 48/1 75/17<br>90/7 118/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>management [16]</b> 20/21 45/15 45/16<br>46/13 46/22 47/6 47/13 76/12 76/13<br>76/23 82/20 86/23 87/10 88/6 93/20<br>117/2                                                                                                                                                 | <b>minute [6]</b> 4/12 66/19 93/3 93/3<br>104/8 104/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Ms. Mueller [1]</b> 2/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>manager [2]</b> 75/19 76/19                                                                                                                                                                                                                                                | <b>minuter [2]</b> 49/5 49/5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Ms. Murray [1]</b> 106/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>manipulating [2]</b> 19/13 19/16                                                                                                                                                                                                                                           | <b>minutes [9]</b> 44/10 49/1 59/8 59/18<br>59/20 104/2 104/9 104/11 121/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Ms. PyFrom-Foster [1]</b> 111/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>manipulative [3]</b> 116/7 116/14 117/15                                                                                                                                                                                                                                   | <b>miscarriage [1]</b> 10/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Ms. Webster [15]</b> 28/10 31/6 49/12<br>97/21 106/2 109/12 109/22 110/20<br>111/9 111/17 112/1 112/14 113/8<br>114/12 120/24                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>many [4]</b> 43/18 91/12 91/15 110/10                                                                                                                                                                                                                                      | <b>missing [6]</b> 4/5 8/12 8/15 60/15<br>95/16 96/15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>much [10]</b> 8/6 33/4 63/14 67/24 69/15<br>69/19 69/23 81/10 85/8 99/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>mapped [1]</b> 55/24                                                                                                                                                                                                                                                       | <b>misstating [1]</b> 13/23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Mueller [1]</b> 2/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Marie [2]</b> 77/21 77/21                                                                                                                                                                                                                                                  | <b>mistake [2]</b> 11/8 22/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>mark [1]</b> 93/3                                                                                                                                                                                                                                                          | <b>mistaken [1]</b> 92/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>marriage [5]</b> 61/3 61/15 77/12 78/9<br>78/10                                                                                                                                                                                                                            | <b>mistakes [1]</b> 92/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>marriages [1]</b> 61/4                                                                                                                                                                                                                                                     | <b>mistress [1]</b> 106/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>married [5]</b> 24/12 60/24 61/2 61/3<br>61/9                                                                                                                                                                                                                              | <b>ML [4]</b> 23/9 23/10 23/12 23/12<br><b>mobile [3]</b> 107/10 107/14 107/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Marshall [9]</b> 1/18 75/12 105/1 116/21<br>117/20 118/4 118/18 120/7 120/24                                                                                                                                                                                               | <b>moment [4]</b> 4/19 5/22 5/25 10/5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Martin [1]</b> 8/17                                                                                                                                                                                                                                                        | <b>moments [1]</b> 45/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>massive [1]</b> 105/24                                                                                                                                                                                                                                                     | <b>money [118]</b> 16/15 16/16 16/18 17/8<br>17/19 19/2 19/20 20/11 25/9 27/17<br>27/22 28/1 28/2 32/1 32/12 32/13<br>32/14 32/16 33/16 37/25 38/2 38/17<br>38/19 38/21 38/25 39/5 39/7 39/12<br>39/14 39/18 40/19 40/21 41/1 41/7<br>41/22 41/25 42/24 43/5 43/7 43/8<br>43/10 43/10 43/12 44/1 44/4 44/7<br>44/11 44/17 44/18 44/22 45/21 45/23<br>46/7 46/20 47/5 47/15 47/17 47/18<br>47/23 48/2 48/4 48/4 48/8 48/10<br>49/21 49/24 50/21 50/24 51/16 51/16<br>51/18 52/7 52/8 52/10 64/16 64/16<br>64/17 64/18 68/4 68/21 68/22 68/25<br>68/25 69/5 69/6 69/6 69/9 69/16<br>69/20 69/23 69/25 76/19 77/1 77/1<br>81/20 86/23 87/2 87/9 87/11 90/10<br>97/8 98/14 99/1 99/11 101/13 101/24<br>113/23 114/5 117/21 117/24 118/25<br>119/3 119/5 119/7 120/6 120/15<br>120/15 120/18 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>matches [1]</b> 43/3                                                                                                                                                                                                                                                       | <b>Montgomery [3]</b> 46/1 47/13 118/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>material [2]</b> 32/23 35/3                                                                                                                                                                                                                                                | <b>monthly [2]</b> 88/5 102/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>materials [1]</b> 48/9                                                                                                                                                                                                                                                     | <b>months [3]</b> 5/17 30/22 96/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>matter [9]</b> 3/1 4/11 36/17 36/20<br>40/11 41/3 87/23 108/6 122/11                                                                                                                                                                                                       | <b>Moore [1]</b> 1/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>matters [3]</b> 36/21 40/5 108/15                                                                                                                                                                                                                                          | <b>more [31]</b> 2/20 3/19 4/13 7/9 8/5<br>11/3 15/14 15/14 19/7 32/3 35/11<br>38/2 43/15 49/5 49/18 55/2 60/1<br>69/10 69/24 71/18 71/18 71/20 73/10<br>73/14 75/2 84/11 85/25 94/2 98/13<br>109/18 114/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>may [23]</b> 1/5 1/9 22/6 25/20 29/16<br>51/2 54/2 54/2 57/2 58/20 61/2 61/8<br>61/8 62/4 62/5 79/11 80/6 85/19 91/8<br>94/13 100/2 100/20 113/1                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>maybe [16]</b> 9/10 26/1 49/5 57/18 67/5<br>75/2 75/20 76/22 82/9 88/25 90/18<br>91/7 92/10 92/13 110/25 114/6                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>me [28]</b> 2/18 4/6 4/19 6/9 6/11 6/12<br>10/7 14/8 19/17 19/17 44/15 44/21<br>44/21 62/17 66/18 68/5 79/8 87/25<br>90/2 92/3 96/13 97/20 98/7 101/16<br>102/14 103/4 120/5 122/15                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>mean [13]</b> 54/3 62/7 67/16 67/19<br>87/14 87/23 88/20 93/7 96/11 98/17                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>M</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>not [200]</b>                                                                                                                                                                                                                                                                                                                                                             | <b>opposite [3]</b> 10/21 52/15 113/12                                                                                                                                                                                                                                                                                                                                    |
| <b>multiple [4]</b> 5/3 18/21 116/6 116/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>not-stamped [1]</b> 58/15                                                                                                                                                                                                                                                                                                                                                 | <b>order [4]</b> 2/2 27/11 57/20 106/14                                                                                                                                                                                                                                                                                                                                   |
| <b>Murray [5]</b> 61/11 61/17 106/3 106/8 106/16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>note [6]</b> 1/17 8/1 8/18 11/24 14/18 40/4                                                                                                                                                                                                                                                                                                                               | <b>orders [1]</b> 97/2                                                                                                                                                                                                                                                                                                                                                    |
| <b>must [15]</b> 27/18 50/11 55/6 56/7 57/23 60/24 60/24 63/25 67/15 70/23 70/25 71/5 93/24 94/14 113/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>noted [3]</b> 3/17 9/16 10/7                                                                                                                                                                                                                                                                                                                                              | <b>organizer [1]</b> 94/14                                                                                                                                                                                                                                                                                                                                                |
| <b>my [44]</b> 2/21 3/1 4/10 4/25 7/12 7/13 10/2 11/16 11/17 11/18 32/16 44/15 44/15 44/20 48/23 67/15 75/25 76/7 76/16 79/12 83/4 83/22 84/18 85/21 86/10 86/14 86/16 86/20 89/21 89/23 91/3 91/14 92/11 92/14 92/15 93/6 93/22 94/10 97/12 99/21 99/25 101/19 113/25 120/5                                                                                                                                                                                                                                                                                                | <b>notes [2]</b> 9/20 9/22                                                                                                                                                                                                                                                                                                                                                   | <b>Orr [4]</b> 2/20 3/1 3/1 3/18                                                                                                                                                                                                                                                                                                                                          |
| <b>Myerson [1]</b> 10/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>nothing [10]</b> 13/22 28/8 28/22 43/8 43/9 70/3 86/21 95/1 97/2 107/5                                                                                                                                                                                                                                                                                                    | <b>other [42]</b> 7/18 8/1 8/18 8/25 11/3 12/6 12/17 16/6 17/23 19/24 28/25 31/1 31/4 31/13 31/23 36/15 36/18 47/8 51/18 54/11 61/10 63/17 66/5 68/11 69/19 72/11 72/22 72/23 77/15 78/20 81/8 81/17 81/21 94/15 95/5 103/10 103/12 109/20 110/7 114/21 115/7 116/11                                                                                                      |
| <b>myself [2]</b> 75/24 91/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>now [46]</b> 2/19 5/18 15/1 24/10 35/8 40/15 44/6 49/17 50/4 52/12 52/25 55/3 55/14 56/5 57/2 57/18 58/19 60/1 60/22 62/9 64/8 64/24 66/2 66/17 70/8 71/15 74/4 79/7 81/8 83/3 85/16 92/4 98/15 104/9 104/11 106/1 108/4 108/17 109/22 110/20 113/8 114/22 115/3 118/18 119/9 120/25                                                                                      | <b>otherwise [3]</b> 14/14 44/19 84/4                                                                                                                                                                                                                                                                                                                                     |
| <b>N</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Now, I [1]</b> 88/11                                                                                                                                                                                                                                                                                                                                                      | <b>our [9]</b> 5/10 6/23 8/9 12/10 20/8 72/7 105/21 106/18 108/24                                                                                                                                                                                                                                                                                                         |
| <b>name [8]</b> 20/4 25/10 74/14 74/17 87/20 89/21 112/16 115/24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>number [8]</b> 1/10 1/10 90/3 98/22 99/5 107/10 107/18 107/18                                                                                                                                                                                                                                                                                                             | <b>out [59]</b> 9/5 13/11 13/18 17/19 18/23 20/22 24/22 26/7 26/25 28/16 28/16 32/4 32/5 32/6 32/9 42/15 42/17 42/21 43/2 44/10 45/18 46/3 47/14 49/19 61/6 64/18 68/24 72/12 80/15 81/2 82/21 82/25 85/9 85/23 86/1 86/3 87/11 87/15 89/21 93/5 94/18 95/21 97/11 97/21 98/9 99/11 99/16 101/17 101/23 102/14 103/7 104/22 113/3 113/20 113/25 114/11 115/4 115/6 120/12 |
| <b>named [3]</b> 35/16 68/24 115/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>numbers [16]</b> 16/8 16/10 21/15 21/19 21/22 21/23 22/8 23/1 23/2 25/5 25/6 25/15 25/16 37/21 46/4 113/4                                                                                                                                                                                                                                                                 | <b>outlandish [1]</b> 73/20                                                                                                                                                                                                                                                                                                                                               |
| <b>names [8]</b> 16/8 16/11 19/9 36/15 53/7 53/12 55/9 108/7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>numerous [1]</b> 10/10                                                                                                                                                                                                                                                                                                                                                    | <b>outside [2]</b> 77/11 78/10                                                                                                                                                                                                                                                                                                                                            |
| <b>narrative [1]</b> 3/21                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>O</b>                                                                                                                                                                                                                                                                                                                                                                     | <b>overall [1]</b> 81/9                                                                                                                                                                                                                                                                                                                                                   |
| <b>national [2]</b> 15/11 42/22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>obligated [1]</b> 97/10                                                                                                                                                                                                                                                                                                                                                   | <b>overlying [1]</b> 93/21                                                                                                                                                                                                                                                                                                                                                |
| <b>nature [8]</b> 42/2 46/10 79/9 82/24 84/3 88/17 93/10 100/1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>obligation [1]</b> 95/24                                                                                                                                                                                                                                                                                                                                                  | <b>overnight [1]</b> 4/6                                                                                                                                                                                                                                                                                                                                                  |
| <b>Navy [1]</b> 64/20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>obtain [1]</b> 86/8                                                                                                                                                                                                                                                                                                                                                       | <b>owed [5]</b> 6/10 27/23 32/12 32/13 64/17                                                                                                                                                                                                                                                                                                                              |
| <b>necessarily [1]</b> 88/16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>obtained [5]</b> 60/16 67/2 86/11 87/21 97/1                                                                                                                                                                                                                                                                                                                              | <b>own [20]</b> 19/11 19/19 26/23 27/25 28/4 31/14 33/17 42/17 47/19 48/1 48/17 51/2 57/1 59/25 63/7 76/17 97/24 105/22 105/23 111/22                                                                                                                                                                                                                                     |
| <b>necessary [1]</b> 66/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>obtainer [1]</b> 84/17                                                                                                                                                                                                                                                                                                                                                    | <b>owner [1]</b> 94/14                                                                                                                                                                                                                                                                                                                                                    |
| <b>need [27]</b> 6/1 6/2 7/10 7/18 14/19 17/25 31/11 33/17 40/8 41/9 48/1 65/16 65/18 66/4 83/20 92/2 97/18 99/24 102/24 103/15 104/1 106/15 108/12 108/20 109/18 113/9 120/12                                                                                                                                                                                                                                                                                                                                                                                              | <b>obtaining [1]</b> 51/5                                                                                                                                                                                                                                                                                                                                                    | <b>owners [3]</b> 66/9 68/11 108/8                                                                                                                                                                                                                                                                                                                                        |
| <b>needed [14]</b> 7/7 18/23 18/24 21/22 46/18 48/10 49/1 65/17 65/18 77/1 108/18 113/5 119/5 119/16                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>obviously [7]</b> 2/16 11/14 14/2 33/21 37/20 40/7 87/19                                                                                                                                                                                                                                                                                                                  | <b>ownership [2]</b> 42/2 46/10                                                                                                                                                                                                                                                                                                                                           |
| <b>needing [1]</b> 105/23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>occasion [3]</b> 10/10 10/11 37/2                                                                                                                                                                                                                                                                                                                                         | <b>P</b>                                                                                                                                                                                                                                                                                                                                                                  |
| <b>needs [4]</b> 18/2 20/15 41/6 41/8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>occasions [1]</b> 51/18                                                                                                                                                                                                                                                                                                                                                   | <b>p.m [6]</b> 104/15 104/16 104/17 105/4 121/10 121/12                                                                                                                                                                                                                                                                                                                   |
| <b>nefarious [1]</b> 88/20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>occurred [1]</b> 6/18                                                                                                                                                                                                                                                                                                                                                     | <b>package [1]</b> 100/13                                                                                                                                                                                                                                                                                                                                                 |
| <b>Neither [1]</b> 10/21                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>October [1]</b> 23/20                                                                                                                                                                                                                                                                                                                                                     | <b>package's [1]</b> 100/16                                                                                                                                                                                                                                                                                                                                               |
| <b>never [31]</b> 6/13 7/16 9/11 9/11 35/25 36/2 41/16 45/14 45/15 47/5 47/5 52/9 55/10 66/9 68/16 74/25 75/1 75/1 77/12 77/21 81/22 82/2 84/6 84/7 86/11 93/2 93/16 95/21 101/5 113/17 114/1                                                                                                                                                                                                                                                                                                                                                                               | <b>odd [1]</b> 94/8                                                                                                                                                                                                                                                                                                                                                          | <b>page [4]</b> 1/10 104/21 104/21 117/4                                                                                                                                                                                                                                                                                                                                  |
| <b>nevertheless [1]</b> 10/23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>off [7]</b> 2/19 19/2 30/9 42/23 46/24 47/15 119/23                                                                                                                                                                                                                                                                                                                       | <b>pages [3]</b> 80/15 95/17 95/17                                                                                                                                                                                                                                                                                                                                        |
| <b>new [1]</b> 21/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>offense [5]</b> 34/7 98/16 101/22 101/23 103/23                                                                                                                                                                                                                                                                                                                           | <b>paid [6]</b> 20/10 27/15 27/15 63/8 87/17 117/7                                                                                                                                                                                                                                                                                                                        |
| <b>news [2]</b> 63/24 64/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>offer [1]</b> 7/20                                                                                                                                                                                                                                                                                                                                                        | <b>painfully [4]</b> 44/9 44/9 44/24 54/9                                                                                                                                                                                                                                                                                                                                 |
| <b>next [18]</b> 4/5 20/1 32/22 44/2 51/20 57/22 58/1 58/5 58/7 58/8 58/13 59/6 59/12 62/25 63/2 108/2 117/5 117/9                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>offered [1]</b> 8/3                                                                                                                                                                                                                                                                                                                                                       | <b>Painting [1]</b> 21/3                                                                                                                                                                                                                                                                                                                                                  |
| <b>nickel [1]</b> 74/5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>office's [1]</b> 5/10                                                                                                                                                                                                                                                                                                                                                     | <b>pair [1]</b> 61/14                                                                                                                                                                                                                                                                                                                                                     |
| <b>nickels [1]</b> 74/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>officer [4]</b> 13/17 91/21 91/25 104/9                                                                                                                                                                                                                                                                                                                                   | <b>pandemic [5]</b> 15/14 42/22 45/22 76/15 88/25                                                                                                                                                                                                                                                                                                                         |
| <b>night [3]</b> 3/17 4/8 5/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>offices [1]</b> 122/7                                                                                                                                                                                                                                                                                                                                                     | <b>paper [3]</b> 48/16 71/15 71/18                                                                                                                                                                                                                                                                                                                                        |
| <b>nine [2]</b> 5/16 55/12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>official [8]</b> 1/3 1/5 1/6 1/11 1/19 1/22 122/5 122/24                                                                                                                                                                                                                                                                                                                  | <b>paperwork [2]</b> 5/4 19/13                                                                                                                                                                                                                                                                                                                                            |
| <b>no [96]</b> 1/18 1/4 2/25 3/10 6/6 8/2 9/3 26/5 26/20 27/12 28/25 29/2 29/3 29/4 29/5 29/8 29/8 29/9 29/21 30/25 33/22 35/23 39/11 41/15 42/18 43/22 44/19 44/20 46/16 46/17 46/17 52/3 52/3 52/5 52/9 52/10 54/18 56/15 61/5 61/22 63/11 65/16 67/1 68/10 68/12 69/8 69/9 70/3 72/11 74/2 74/19 74/20 74/21 74/22 76/9 76/15 76/21 76/25 78/1 79/8 84/4 87/3 90/25 94/10 94/19 95/19 96/3 96/19 96/21 96/23 96/24 96/24 96/24 96/25 96/25 97/2 97/2 97/3 97/6 97/9 98/8 99/2 99/12 101/1 101/6 108/25 109/8 109/8 116/12 116/12 117/12 117/12 117/13 118/9 120/4 122/12 | <b>oh [7]</b> 44/20 68/1 68/3 91/3 91/17 92/13 118/6                                                                                                                                                                                                                                                                                                                         | <b>Parker [2]</b> 21/4 21/7                                                                                                                                                                                                                                                                                                                                               |
| <b>no-good/bad [1]</b> 61/5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>okay [13]</b> 14/13 14/17 52/7 57/18 59/9 59/17 63/7 86/4 87/5 87/11 101/24 104/13 121/1                                                                                                                                                                                                                                                                                  | <b>part [15]</b> 4/2 14/2 27/14 36/25 39/4 46/9 65/22 78/9 80/3 81/24 84/9 88/18 96/2 99/6 100/5                                                                                                                                                                                                                                                                          |
| <b>nobody [1]</b> 111/13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>once [2]</b> 3/9 97/10                                                                                                                                                                                                                                                                                                                                                    | <b>partial [1]</b> 1/12                                                                                                                                                                                                                                                                                                                                                   |
| <b>non [4]</b> 57/21 58/3 58/17 60/11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>one [63]</b> 2/6 4/19 5/2 8/1 8/4 8/9 10/10 11/1 12/5 12/15 17/12 17/22 21/14 22/14 23/18 24/5 27/7 36/10 36/22 37/2 41/5 43/1 44/4 44/5 45/6 47/8 48/11 48/13 50/5 53/17 53/19 54/3 54/17 54/18 55/5 56/8 57/7 58/6 58/7 58/11 58/16 59/12 59/12 60/1 61/5 61/22 65/13 65/17 66/12 67/1 69/18 78/14 82/18 82/21 85/18 86/21 88/2 97/21 98/18 102/14 112/19 115/15 116/15 | <b>participant [2]</b> 69/11 71/6                                                                                                                                                                                                                                                                                                                                         |
| <b>non-stamped [4]</b> 57/21 58/3 58/17 60/11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>ones [19]</b> 7/6 16/4 24/2 53/3 53/10 53/11 55/11 55/15 56/9 59/16 59/16 62/11 63/17 70/14 83/21 98/23 108/17 110/5 110/6                                                                                                                                                                                                                                                | <b>participate [2]</b> 76/4 114/9                                                                                                                                                                                                                                                                                                                                         |
| <b>noncontroversial [1]</b> 3/2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>online [1]</b> 18/12                                                                                                                                                                                                                                                                                                                                                      | <b>participated [4]</b> 15/10 17/14 32/19 50/14                                                                                                                                                                                                                                                                                                                           |
| <b>none [11]</b> 15/24 16/13 41/19 68/13 84/18 86/10 96/21 97/1 112/25 114/15 118/17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>only [31]</b> 1/5 1/10 13/11 20/9 24/1 24/5 26/18 28/15 28/23 30/24 31/11 36/8 36/25 39/17 39/25 40/1 43/12 44/12 44/14 46/5 48/20 53/19 54/5 60/6 60/6 64/22 66/12 70/20 72/2 75/9 119/4                                                                                                                                                                                 | <b>participating [1]</b> 39/18                                                                                                                                                                                                                                                                                                                                            |
| <b>NORTHERN [6]</b> 1/1 4/11 34/12 41/17 41/19 122/6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>open [2]</b> 8/21 122/10                                                                                                                                                                                                                                                                                                                                                  | <b>participation [2]</b> 39/12 68/22                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>opening [3]</b> 28/10 29/11 49/15                                                                                                                                                                                                                                                                                                                                         | <b>parties [3]</b> 12/5 12/14 81/9                                                                                                                                                                                                                                                                                                                                        |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>openly [1]</b> 77/6                                                                                                                                                                                                                                                                                                                                                       | <b>partners [2]</b> 45/25 46/6                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>operating [1]</b> 72/19                                                                                                                                                                                                                                                                                                                                                   | <b>party [3]</b> 8/10 12/7 12/17                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>operation [1]</b> 117/6                                                                                                                                                                                                                                                                                                                                                   | <b>passcode [1]</b> 106/9                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Operations [2]</b> 20/25 58/10                                                                                                                                                                                                                                                                                                                                            | <b>passing [1]</b> 28/23                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>opinion [1]</b> 11/17                                                                                                                                                                                                                                                                                                                                                     | <b>password [3]</b> 30/7 30/8 106/6                                                                                                                                                                                                                                                                                                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>opportunity [1]</b> 89/25                                                                                                                                                                                                                                                                                                                                                 | <b>passwords [2]</b> 29/9 29/10                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                              | <b>past [3]</b> 56/3 59/24 67/10                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                              | <b>pattern [19]</b> 19/24 20/20 21/3 21/4 21/25 23/5 24/6 57/20 58/16 58/21 59/14 59/22 60/1 60/2 60/6 60/20 109/22 109/23 109/24                                                                                                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                              | <b>pause [1]</b> 74/24                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                              | <b>pauses [1]</b> 119/18                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                              | <b>pay [4]</b> 27/19 46/24 47/15 97/18                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                              | <b>PayCard [7]</b> 55/10 106/25 107/5 107/6 107/11 107/23 112/9                                                                                                                                                                                                                                                                                                           |

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             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