

EXHIBIT A

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

**UNITED STATES OF
AMERICA,**

vs.

**RICKY DIXON,
MEGHAN THOMAS,
JESIKA BLAKELY,
AMANDA CHRISTIAN,
DWAN ASHONG A/K/A DWAN
GILPIN,
JOHN GAINES A/K/A MARTY
GAINES,
CHARLES PETTY A/K/A
CHARLES KNIGHT,
JERRY BAPTISTE,
CARLA JACKSON,
DEREK PARKER,
DAVID BELGRAVE II,
CHARLES HILL IV,
RYAN WHITTLEY,
EL HADJ SALL, AND
RICK MCDUFFIE**

**Criminal Action No.
Case No. 1:20-CR-296-JPB-CMS**

**AFFIDAVIT OF ANGELINA BANKS IN SUPPORT OF
PETITION TO CONTEST THE FORFEITURE OF PROPERTY**

Personally appeared before me the undersigned officer duly authorized by law to administer oaths, Angelina Banks who after being duly sworn, deposes and states under oath as follows:

1.

My name is Angelina Banks. I am an adult, female citizen of the United States of America and the State of Georgia, suffer no known disabilities, and testify herein to facts which are personally known to be true and correct.

2.

I am the Principal of New Horizon Real Estate, LLC ("New Horizon").

3.

New Horizon purchased the property located at 503-505 Rockwell Street, Fulton County, Georgia (the "Property") in an arms-length transaction on October 14, 2021.

4.

I saw the Property's listing on Zillow and worked with an agent to purchase the Property New Horizon purchased the Property.

5.

I am real estate investor by trade.

6.

New Horizon paid \$62,500.00 for the Property.

7.

Based on my experience, \$62,500.00 was the fair market valuation of the Property at the time New Horizon purchased it.

8.

At the time New Horizon purchased the Property, it was vacant land.

9.

I regularly purchase property, invest in renovations of or additional buildings on said property, and then sell the property for profit.

10.

After New Horizon purchased the Property, it spent almost \$400,000 to build a house on the Property and is now under contract to sell the Property.

11.

No one informed New Horizon or me of the lis pendens on the Property or the Consent Preliminary Order of Forfeiture as part of the purchase or closing of the sale of the Property.

12.

Had they done so, New Horizon would not have purchased and invested hundreds of thousands of dollars in improving the Property.

13.

New Horizon first became aware that the United States claimed an interest in the Property as part of New Horizon's efforts to sell the Property to a third party.

14.

New Horizon purchased the Property in fee simple from The Atlanta 10 Group, LLC on October 14, 2021, and is the current title holder of the Property.

15.

I do not know Charles Hill or any of the defendants in the above-captioned proceeding.

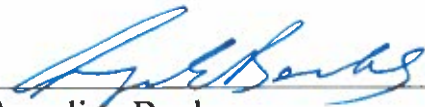
16.

Neither New Horizon nor I has any relation or connection to All Legal Hustles, LLC.

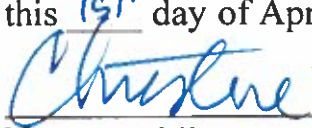
17.

New Horizon purchased the Property for value in an arms-length transaction without actual notice of the lis pendens on the Property or the subsequent Consent Preliminary Order of Forfeiture.

AFFIANT FURTHER SAITH NOT.


Angelina Banks
Principal
New Horizon Real Estate, LLC

Sworn to and Subscribed before me
this 15th day of April 2024


Notary Public
My Commission Expires

