UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

UNITED STATES OF AMERICA	)	
	)	CASE NO. CR 3:22-CR-009
v.	)	
	)	
GLADYS HARUN	)	

UNITED STATES' NOTICE OF INTENT TO OFFER CERTIFIED BUSINESS RECORDS PURSUANT TO F.R.E. 902(11)

The United States notifies the Court and counsel of its intent to offer at trial self-authenticating records pursuant to Federal Rule of Evidence 902(11). Said records were created and maintained by Truist Financial ("Truist), formerly SunTrust Bank, Wells Fargo Bank, N.A. ("Wells Fargo"), Green Dot Bank, a wholly owned subsidiary of Green Dot Corporation ("Green Dot"), Yahoo, Inc. ("Yahoo"), DocuSign, Inc. ("DocuSign"), and Block, Inc. ("Block"), formerly known as Square, Inc., Google LLC ("Google"), and Charter Communications, Inc. ("Charter").

Each record referred to herein is accompanied by a certification of a qualified custodian that meets the requirements of Rules 902(11) and 803(6)(A)–(C). *See* Exs. A–J.

The Truist records contain signature cards, statements, deposits, checks, and debits for Defendant's personal and business accounts ending in 2876, 6416, 6440, and 7890. *See* Ex. A. The Wells Fargo records Bates numbered WF000001 to WF000127 and referenced in Exhibit B's certification include documents, Defendant's PPP application, promissory note and agreement, and records for Defendant's account ending in 6523. *See* Ex. B. The Wells Fargo records referenced in Exhibit

C's certification contain signature cards, statements, deposits, checks, and debits for the accounts listed in the certification. *See* Ex. C. The Green Dot records concern card reference number ending in 4854 and consist of cardholder information, transaction records and history, direct deposit, and IP address information. *See* Ex. D. The Yahoo records pertain to the email account embraceafrica@yahoo.com and consist of subscriber details, IP login events, and email content. *See* Ex. E.

The DocuSign records consist of Certificates of Completion and audit histories concerning Defendant's PPP loan submissions. *See* Ex. F. The Lendio records, Bates numbered BJ0001-BJ0069, contain Defendant's PPP borrower application dated March 16, 2021, and documents submitted in support of her application. *See* Ex. G. The Block records consist of account transactions, payment history, and subscriber information for Defendant's Square account. *See* Ex. H. The Google records consist of subscriber, customer, and billing information, along with IP records, associated with the email account embraceafrica20@gmail.com. *See* Ex. I. The Charter records consist of subscriber accounts for IP addresses 96.32.198.181, 96.32.198.181, 96.32.198.181. *See* Ex. J.

The records and certifications have been produced in discovery and made available to defense counsel for inspection.

RESPECTFULLY SUBMITTED this __ day of January 2023.

DAVID H. ESTES
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