IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA v. RAYMOND RAHBAR, and RYAN MACAULAY *Defendants*.	Case No. 1:24-cr-180-PTG

SUPPLEMENTAL NOTICE OF INTENT TO RELY ON BUSINESS RECORD CERTIFICATIONS UNDER 902(11)

The United States notices its intent under Federal Rule of Evidence 902(11) to rely on business record certifications to establish the authenticity of certain documents that were kept in the regular course of business.

Custodian	**902(11) Certification**	**Bates Range of Certified Documents**
Revised Certifications[1]		
Cross River Bank	US-00023027	US-00023014 – US-00023428; US-00030856 – US-00030914
Freedom Bank	US-00023785	US-00023789 – US-00024142; US-00030971 – US-00032860
FVC Bank	US-00011439	US-00011068 – US-00018325; US-00027718 – US-00029353
Virginia State Corporation Commission	US-00037261	US-00037257 – US-00037260

[1] On April 3, 2025, counsel for defendants informed counsel for the United States of potential errors in the Bates range of certified documents. In two instances, the range included in the first notice did not account for gaps in the Bates numbers. This supplemental notice corrects the Bates range for the affected documents and corrects two other typographical errors. The United States found no errors in the Bates number for any certification.

Custodian	902(11) Certification	Bates Range of Certified Documents
Additional Certifications		
Cox Enterprises	US-00129734	US-00034683 – US-00034685
D.C. Department of Employment Services	US-00132886	US-00000222 – US-00000234
Legacy Bank	TBD[2]	US-00019747 – US-00019999; US-00023740 – US-00023742; US-00029682 – US-00029720; US-00030923 – US-00030957; US-00034275 – US-00034531; US-00122050 – US-00122917
Maryland Department of Labor	US-00129735	N/A
Virginia Employment Commission	US-00121993	US-00121994 – US-00121999

Respectfully Submitted,

Erik S. Siebert
United States Attorney

By: _____

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[2] This document will be included in the United States' next document production.

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to all counsel of record.

Christopher J. Hood
Assistant United States Attorney