

FREEDOM OF INFORMATION ACT REQUEST

CERTIFIED MAIL: 7015 1520 0003 0903 1665 & 7015 1520 0003 0903 1719
RETURN RECEIPT REQUESTED

NAME: Deshawn Reilly
REG. NO.: 65861-019
Federal Correctional Complex Low
Post Office Box 5000
Yazoo City, MS 39194-5000

EXECUTIVE OFFICE OF THE UNITED STATES ATTORNEY'S
Freedom of Information Act/DC
600 East Street N.W.
Room 7300 Bicentennial Building
Washington, D.C. 20530

In Regards To: Freedom of Information Act Request
Requested Documents: Oath of Office
Certificate of Appointment of:

Employee(s) Name: U.S. Attorney Karl Knoche *Karl Knoche*

Document Sought: Oath of Office for the years of: 2011-2018

Document Sought: Certificate of Appointment of: U.S. Attorney Karl Knoche
Karl Knoche

TO WHOM IT MAY CONCERN:

Pursuant to the Freedom of Information Act Title 5 U.S.C. §552 et. seq., and the Privacy Act and Public Records laws under Title 5 U.S.C. §2906, the Undersigned request that your agency release and submit to me the following documents in the care, custody are requested under the names of specified government employees, officials, agents of the United States Attorneys Office located at 22 Barnard St., Suite 300, Savannah, GA 31402.

Please provide me the above requested documents within the thirty (30) days time period after receipt of this document/FOIA request, please waive any and all search time, fees for this request and note that the first one hundred pages are free.

Thank you in advance for your time and consideration in this matter.

Sincerely Yours,

This 27th day of April 2020

By: *Deshawn Reilly*

FREEDOM OF INFORMATION ACT REQUEST

CERTIFIED MAIL: 7015 1520 0003 0903 3355
RETURN RECEIPT REQUESTED

Deshawn Reilly
Reg. No.: 65861-019
Federal Correctional Complex Low
Post Office Box 5000
Yazoo City, MS 39194-5000

EXECUTIVE OFFICE OF THE UNITED STATES ATTORNEY'S
Freedom of Information Act/DC
600 East Street N.W.
Room 7300 Bicentennial Building
Washington, DC 20530

In Regards To: Freedom of Information Act Request
Requested Documents: Oath of Office
Certificate of Appointment of:

Employee(s) Name: Edward J. Tarver
Document Sought: Oath of Office for the years of 2011-2017
Document Sought: Certificate of Appointment of U.S. Attorney Edward J.
Tarver

TO WHOM IT MAY CONCERN:

Pursuant to the Freedom of Information Act Title 5 U.S.C. §552 et. seq.,
and the Privacy Act and Public Records laws under Title 5 U.S.C. §2906,
the undersigned request that your agency release and submit to me the
following documents in the care, custody are requested under the names
of specified government employees, officials, agents of the United States
Attorneys Office located at 3540 Wheeler Road Suite 312, Augusta GA 30909.

Please provide me the above requested documents within the thirty (30)
days time period after receipt of this document/FOIA request, please
waive any and all search time, fees for this request and note that the
first one hundred pages are free.

Thank you in advance for your time and consideration in this matter.

This 10th day of July 2020

Sincerely Yours,

By: *Deshawn Reilly*

(EXHIBIT-C



U.S. Department of Justice

Executive Office for United States Attorneys

Freedom of Information and Privacy Staff

Suite 3.400, JCOH Building
175 N Street, NE
Washington, DC 20530

(202) 252-6020
FAX (202) 252-6048

June 25, 2020

DeShawn Reilly
1701 Sequoi Court
Allentown, PA 18104

Re: EOUSA 2020-002929
Date Received: June 4, 2020
Subject: Oaths of Office (Matthew Josephson, Edward Traver)

Dear Mr. Reilly:

Your request for records under the Freedom of Information Act/Privacy Act has been processed. This letter constitutes a reply from the Executive Office for United States Attorneys, the official record-keeper for all records located in this office and the various United States Attorneys' Office.

To provide you with the greatest degree of access authorized by the Freedom of Information Act and the Privacy Act, we have considered your request in light of the provisions of both statutes.

The records you seek are located in a Privacy Act system of records that, in accordance with regulations promulgated by the Attorney General, is exempt from the access provisions of the Privacy Act. 28 CFR § 16.81. We have also processed your request under the Freedom of Information Act and are making all records required to be released, or considered appropriate for release as a matter of discretion, available to you. This letter is a partial denial full denial.

Enclosed please find:

0 page(s) are being released in full (RIF);
1 page(s) are being released in part (RIP);
0 page(s) are withheld in full (WIF). The redacted/withheld documents were reviewed to determine if any information could be segregated for release.

The exemption(s) cited for withholding records or portions of records are marked below. An enclosure to this letter explains the exemptions in more detail.

(b) (6)

Also, a search of the records at EOUSA's personnel office has resulted in no records being found for an Oath of Office for Edward Traver. If you would like to see if there is an existing Oath of Office for Mr. Traver, you may want to send a FOIA to the National Archives

Records Administration at: National Archives at Atlanta, 57800 Jonesboro Road, Morrow, GA 30260.

This is the final action on this above-numbered request. If you are not satisfied with my response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 414 G Street, N.W., Sixth Floor, Washington, D.C. 20001, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within 90 days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal."

You may contact our FOIA Public Liaison at the Executive Office for United States Attorneys (EOUSA) for any further assistance and to discuss any aspect of your request. The contact information for EOUSA is 175 N Street, NE, Suite 5.400, Washington, DC 20530; telephone at 202-252-6020; or facsimile 202-252-6048. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,



Kevin Krebs
Assistant Director

Enclosure(s)

EXPLANATION OF EXEMPTIONS

FOIA: TITLE 5, UNITED STATES CODE, SECTION 552

- (b)(1) (A) specifically authorized under criteria established by and Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified pursuant to such Executive order;
- (b)(2) related solely to the internal personnel rules and practices of an agency;
- (b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual.
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) geological and geophysical information and data, including maps, concerning wells.

PRIVACY ACT: TITLE 5, UNITED STATES CODE, SECTION 552a

- (d)(5) information compiled in reasonable anticipation of a civil action proceeding;
- (j)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) information which is currently and properly classified pursuant to Executive Order 12356 in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) required by statute to be maintained and used solely as statistical records;
- (k)(5) investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualification for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his identity would be held in confidence;
- (k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;
- (k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his identity would be held in confidence.



U.S. Department of Justice

Executive Office for United States Attorneys

Freedom of Information and Privacy Staff

Suite 5.400, JCON Building
175 N Street, NE
Washington, DC 20530

(202) 232-6030
FAX (202) 232-6048

August 24, 2020

DeShawn Reilly
1701 Sequoi Court
Allentown, PA 18104
Re: EOUSA 2020-002929

Date Received: August 3, 2020
Subject: Oaths of Office (Karl Knoche)

Dear Mr. Reilly:

Your request for records under the Freedom of Information Act/Privacy Act has been processed. This letter constitutes a reply from the Executive Office for United States Attorneys, the official record-keeper for all records located in this office and the various United States Attorneys' Office.

To provide you with the greatest degree of access authorized by the Freedom of Information Act and the Privacy Act, we have considered your request in light of the provisions of both statutes.

The records you seek are located in a Privacy Act system of records that, in accordance with regulations promulgated by the Attorney General, is exempt from the access provisions of the Privacy Act. 28 CFR § 16.81. We have also processed your request under the Freedom of Information Act and are making all records required to be released, or considered appropriate for release as a matter of discretion, available to you. This letter is a [X] partial denial [] full denial.

Enclosed please find:

0 page(s) are being released in full (RIF);
1 page(s) are being released in part (RIP);
0 page(s) are withheld in full (WIF). The redacted/withheld documents were reviewed to determine if any information could be segregated for release.

The exemption(s) cited for withholding records or portions of records are marked below. An enclosure to this letter explains the exemptions in more detail.

(b)(6).

In addition, a review of the material revealed:

This is the final action on this above-numbered request. If you are not satisfied with my response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, N.W., Sixth Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within 90 days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal."

You may contact our FOIA Public Liaison at the Executive Office for United States Attorneys (EOUSA) for any further assistance and to discuss any aspect of your request. The contact information for EOUSA is 175 N Street, NE, Suite 5.400, Washington, DC 20530; telephone at 202-252-6020; or facsimile 202-252-6048. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,



Kevin Krebs
Assistant Director

Enclosure(s)

STANDARD FORM 61
REVISED SEPTEMBER 1979
U.S. CIVIL SERVICE COMMISSION
F.P.M. CHAPTER 293
61-107

APPROVAL NO. 50-10115

APPOINTMENT AFFIDAVITS

Assistant United States Attorney
(Position to which appointed)

5/21/89
(Date of appointment)

U.S. Department of Justice U.S. Attorney's Office Savannah, GA
(Department or agency) (Bureau or division) (Place of employment)

I, Karl I. Knoche, do solemnly swear (or affirm) that—

A. OATH OF OFFICE

I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter. So help me God.

B. AFFIDAVIT AS TO STRIKING AGAINST THE FEDERAL GOVERNMENT

I am not participating in any strike against the Government of the United States or any agency thereof, and I will not so participate while an employee of the Government of the United States or any agency thereof.

C. AFFIDAVIT AS TO PURCHASE AND SALE OF OFFICE

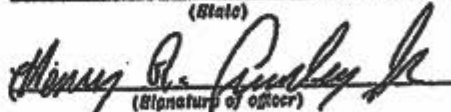
I have not, nor has anyone acting in my behalf, given, transferred, promised or paid any consideration for or in expectation or hope of receiving assistance in securing this appointment.


(Signature of appointee)

Subscribed and sworn (or affirmed) before me this 22nd day of May A.D. 1989

at Savannah Georgia
(City) (State)

[SEAL]


(Signature of officer)

Commission expires _____
(If by a Notary Public, the date of expiration of his Commission should be shown)

Clerk, U. S. District Court
(Title)

NOTE—The oath of office must be administered by a person specified in 5 U.S.C. 2003; The words "So help me God" in the oath and the word "swear" wherever it appears above should be stricken out when the appointee elects to affirm rather than swear to the affidavit; only these words may be stricken and only when the appointee elects to affirm the affidavit.

EXPLANATION OF EXEMPTIONS

FOIA: TITLE 5, UNITED STATES CODE, SECTION 552

- (b)(1) (A) specifically authorized under criteria established by and Executive order to be kept secret in the in the interest of national defense or foreign policy and (B) are in fact properly classified pursuant to such Executive order;
- (b)(2) related solely to the internal personnel rules and practices of an agency;
- (b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual.
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) geological and geophysical information and data, including maps, concerning wells.

PRIVACY ACT: TITLE 5, UNITED STATES CODE, SECTION 552a

- (d)(5) information compiled in reasonable anticipation of a civil action proceeding;
- (f)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) information which is currently and properly classified pursuant to Executive Order 12356 in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) required by statute to be maintained and used solely as statistical records;
- (k)(5) investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualification for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his identity would be held in confidence;
- (k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;
- (k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his identity would be held in confidence.

PSUDOI

(EXHIBIT-D)

EXECUTIVE OFFICE OF THE UNITED STATES ATTORNEY

REQUEST NUMBER: FOIA-EOUSA-2020-002929

THIS IS NOT A BILL DO NOT SEND MONEY

"FREEDOM OF INFORMATION ACT APPEAL"

CHOOSE ONE

I wish to modify any request in an attempt to obtain a quicker response and/or reduce fees as follows

Dear Sir, I am making this request under the FOIA/Privacy Act. I am seeking the Oath of Office of Edward Tarver, Karl Knoche and Mathew Josephson, for the years March 19, 2011 to March 19, 2017, I would also like the Appointment Affidavits for that time period if there is none please inform me that there is none. Also if these three officials made payment or taken the mandated Congressional Commanded Oath of Office, FOIA- EOUSA 2020-002929 Subject of Request:

AUSA Oath of Office, Thank you in Advance for your time and assistance.

I understand that an entitled to the first 100 pages and two hours of search time for free. Please do not search beyond two hours, nor duplicate beyond 100 pages.

I agree to pay up to the following amount for duplication and search time:

\$ _____ I understand that this payment is required even if a documents are located or released to me. In the event that documents are located and released to me, I understand that I may be charged duplication fees in addition to search fees.

I wish to withdraw my request,

Deshawn Reilly
Signature

9/21/20
Date

Please return to: Deshawn Reilly
EOUSA Personnel
FOIA/PA EOUSA 2020-002929 AUSA Oath of Office
600 E Street, N.W., Room 7300
Washington, DC 20530

CC: Deshawn Reilly
Reg. No. 65861-019
FCI Yazoo City Low
P.O. Box 5000
Yazoo City, MS 39194

Certified Mail No.
7014 0510 0000 8847 8597

(EXHIBIT-E)



U.S. Department of Justice
Office of Information Policy
Sixth Floor
441 G Street, NW
Washington, DC 20530-0001

Telephone: (202) 514-3642

November 18, 2020

DeShawn Reilly
1701 Squoi Court
Allentown, PA 18104

Re: Appeal No. A-2021-02205; A-
2021-02233; A-2021-00324
Request No. BOUSA-2020-
002929; BOUSA-2020-002678;
BOUSA-2020-3910
DRC:KHK

VIA: U.S. Mail

Dear DeShawn Reilly:

You appealed from the action of the Executive Office for United States Attorneys (EOUSA) on your Freedom of Information Act (FOIA) requests for access to records concerning (1) the oaths of office and certificates of appointment for Matthew Allen Josephson, Brian T. Rafferty, Edward T. Tarver, and James D. Dunham; (2) the Oath of office for John Ghose; and (3) the oath of office for Karl Khoche. I have construed your appeals as concerning the adequacy of EOUSA's search for responsive records and EOUSA's withholding of certain information.

After carefully considering your appeals, I am affirming EOUSA's actions on your requests. The FOIA provides for disclosure of many agency records. At the same time, Congress included in the FOIA nine exemptions from disclosure that provide protection for important interests such as personal privacy, privileged communications, and certain law enforcement activities. EOUSA properly withheld certain information because it is protected from disclosure under the FOIA pursuant to 5 U.S.C. § 552(b)(6) and it is reasonably foreseeable that disclosure of this information would harm the interests protected by this provision. This provision concerns material the release of which would constitute a clearly unwarranted invasion of the personal privacy of third parties.

As to your appeals concerning the adequacy of EOUSA's search for responsive records subject to the FOIA, I have determined that BOUSA's responses were correct and that it conducted an adequate, reasonable search for such records.


Please be advised that this Office's decision was made only after a full review of this

matter. Your appeals were assigned to an attorney with this Office who thoroughly reviewed and analyzed your appeals, your underlying requests, and the actions of EOUSA in response to your requests.

If you are dissatisfied with my action on your appeals, the FOIA permits you to file a lawsuit in federal district court in accordance with 5 U.S.C. §552(a)(4)(B).

For your information, the Office of Government Information Services (OGIS) offers mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; email at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769. If you have any questions regarding the action this Office has taken on your appeals, you may contact this Office's FOIA Public Liaison for your appeals. Specifically, you may speak with the undersigned agency official by calling (202) 514-3642.

Sincerely,

X 

Daniel Castellano,
Acting Associate Chief, for
Matthew Hurd, Acting Chief,
Administrative Appeals Staff

(EXHIBIT-F)



U.S. Department of Justice
Office of Information Policy
Sixth Floor
441 G Street, NW
Washington, DC 20530-0001

Telephone: (202) 514-3642

November 18, 2020

DeShawn Reilly
1701 Sequoi Court

Allentown, PA 18104

Re: Appeal No. A-2021-02205; A-
2021-02233; A-2021-00324
Request No. EOUSA-2020-
002929; EOUSA-2020-002678;
EOUSA-2020-3910
DRC:KHK

VIA: U.S. Mail

Dear DeShawn Reilly:

You appealed from the action of the Executive Office for United States Attorneys (EOUSA) on your Freedom of Information Act (FOIA) requests for access to records concerning (1) the oaths of office and certificates of appointment for Matthew Allen Josephson, Brian T. Rafferty, Edward T. Tarver, and James D. Dunham; (2) the Oath of office for John Ghose; and (3) the oath of office for Karl Khoche. I have construed your appeals as concerning the adequacy of EOUSA's search for responsive records and EOUSA's withholding of certain information.

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As to your appeals concerning the adequacy of EOUSA's search for responsive records subject to the FOIA, I have determined that EOUSA's responses were correct and that it conducted an adequate, reasonable search for such records.

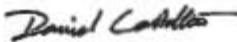
Please be advised that this Office's decision was made only after a full review of this

matter. Your appeals were assigned to an attorney with this Office who thoroughly reviewed and analyzed your appeals, your underlying requests, and the actions of BOUSA in response to your requests.

If you are dissatisfied with my action on your appeals, the FOIA permits you to file a lawsuit in federal district court in accordance with 5 U.S.C. §552(a)(4)(B).

For your information, the Office of Government Information Services (OGIS) offers mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; email at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769. If you have any questions regarding the action this Office has taken on your appeals, you may contact this Office's FOIA Public Liaison for your appeals. Specifically, you may speak with the undersigned agency official by calling (202) 514-3642.

Sincerely,

X 

Daniel Castellano,
Acting Associate Chief, for
Matthew Hurd, Acting Chief,
Administrative Appeals Staff

(EXHIBIT-G)

2. The CSA and its implementing regulations set forth which drugs and other substances are defined by law as "controlled substances," and those controlled substances are then assigned to one of five schedules (Schedule I, II, III, IV, or V) depending on their potential for abuse, likelihood of physical or psychological dependency, accepted medical use, and accepted safety for use under medical supervision.

3. The term "Schedule I" means that the drug has a high potential for abuse; the drug has no currently accepted medical use in treatment in the United States, and there is a lack of accepted safety for use of the drug or other substance under medical supervision. 21 U.S.C. § 812(b)(1).

4. Pursuant to the CSA and its implementing regulations: Marihuana is classified as a Schedule I controlled substance. 21 C.F.R. § 1308.11(d)(23).

5. The term "distribute" means to deliver (other than by administering or dispensing) a controlled substance or a listed chemical. The term "distributor" means a person who so delivers a controlled substance or a listed chemical. (21 U.S.C. § 802(11)).

MANNER AND MEANS OF CONSPIRACIES

6. On multiple occasions between May 1, 2011 and December 24, 2014, the defendants obtained marihuana, typically in quantities in excess of 25 pounds, at locations in the States of Texas and California. The marihuana was acquired with the intent to resell it for profit at multiple locations in the United States, including the Southern District of Georgia.

7. In order to acquire the marihuana, some of the defendants, including Lametheus Terence Douglas, Kai Jacobie Bolden, Deshawn Binah Reilly, Curel Taylor Reilly, and Brian Donovan Ulmer, would travel by commercial airline and other means, from locations in the

Southern District of Georgia, Northern District of Georgia, and elsewhere, to Texas and California where their sources of supply distributed marihuana.

8. The defendants leased an apartment located at 202 South 48th Lane, McAllen Texas, as a base of operation while they were in Texas to acquire marihuana. The apartment was leased in the name of the defendant Delmus Lockhart, Jr.

9. In order to purchase the marihuana from their sources of supply, defendants needed to pay cash on delivery. The purchase price for the marihuana typically exceeded \$200 per pound. Given the quantity of marihuana being purchased, the defendants needed ready access to large sums of cash.

10. To facilitate the movement of the large sums of cash needed to pay for the marihuana, defendants opened, or instructed others to open, bank accounts at large banking institutions with branches in locations throughout the United States. These banks included Wells Fargo, Bank of America, JP Morgan Chase, and Regions Bank.

11. Some defendants, including Lametheus Terence Douglas, Kai Jacobie Bolden, Deshawn Binah Reilly, Larry Turner Douglas, Jr., Curel Taylor Reilly, Samory Toure Williams, Jovan Antuan Myrick, and Delmus Lockhart, Jr., and Darvin Esquire Strand, Jr., opened bank accounts, or instructed others to open bank accounts, in the defendants' names, in fictitious names, or in the names of nominal businesses, which they then used to promote the carrying on of the aforesaid unlawful activity and to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the distribution of marihuana and their involvement in the unlawful activity. None of these nominal businesses had any legitimate business purpose.

12. Once opened, these bank accounts allowed the defendants to quickly move, or “funnel,” funds across large distances without the risks associated with the physical transportation of cash. Defendants caused cash to be deposited into these “funnel” accounts at or near the time of the purchase of the marihuana. The deposits were typically made in locations throughout the United States, often by “straw” parties who were not the actual owners of the funds being deposited. These deposits were accomplished by making multiple deposits at different times on the same day, or consecutive days, at the same bank branch location, and sometimes by making deposits on the same day, or consecutive days, at different bank branch locations. A majority of these cash deposits were “structured,” that is, deposited into these various accounts in amounts less than \$10,000 in order to avoid triggering a transaction reporting requirement required under Federal law.

13. After cash was deposited into a funnel accounts as described above, it would then be withdrawn from the account, often in structured amounts, at a bank branch in the source region of Texas or California where the marihuana was being purchased. Oftentimes, little time elapsed between the deposits and withdrawals. Once withdrawn, the funds were used to purchase marihuana.

14. Once purchased, the marihuana would be shipped via Federal Express, using numerous Federal Express shipping accounts held in fictitious names, to locations in the Southern District of Georgia, and elsewhere, including the States of Alabama, California, Florida, Michigan, Minnesota, Mississippi, New York, Pennsylvania, and Tennessee. The persons to whom the packages were shipped included the defendants Lametheus Terence Douglas, Curel Taylor Reilly, Javon Antuan Myrick, Delmus Lockhart, Jr., and Vicobri Roykiam

Miller. Upon receipt, the packages would be taken to one or more stash houses controlled by Lamethus Terence Douglas, Kai Jacobie Bolden, Deshawn Binah Reilly, Curel Taylor Reilly, and others. There the marihuana was packaged for resale.

15. After the marihuana was resold by the defendants, the proceeds were deposited into the various bank accounts described above with the intent to promote the carrying on of the aforesaid unlawful activity and to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the distribution of marihuana.

16. From May 1, 2011 through December 24, 2014, more than \$8,000,000 in cash was deposited to accounts controlled by the defendants. During this time, more than \$3,000,000 was withdrawn from these accounts by the defendants in the regions where the marihuana was purchased.

COUNT ONE
**CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE AND
TO DISTRIBUTE MARIHUANA**

17 Paragraphs 1 through 16 of the Indictment are re-alleged and incorporated fully herein by reference.

18. Beginning on or about May 1, 2011, and continuing through on or about December 24, 2014, in Chatham County, Bulloch County, and other counties within the Southern District of Georgia, and elsewhere, the defendants herein:

**LAMETHEUS TERENCE DOUGLAS,
AKA "MEPHY,"
KAI JACOBIE BOLDEN,
AKA "DWAYNE DEANGELO WALLACE,"
DESHAWN BINAH REILLY,
AKA "DUSHAWN REILLY,"
AKA "LEO HURTAULT,"
AKA "CHARLES EDWARD WHEELER,"**

**LARRY TURNER DOUGLAS, JR.,
CUREL TAYLOR REILLY,
AKA "CRUEL TAYLOR,"
AKA "CURELL TAYLOR,"
AKA "CRUEL RHONDA TAYLOR,"
SAMORY TOURE WILLIAMS,
AKA "T,"
JOVAN ANTUAN MYRICK,
DELMUS LOCKHART, JR.,
BRIAN DONIVAN ULMER,
VICOBRI ROYKIAM MILLER,
AKA "COBY," AND
DARVIN ESQUIRE STRAND, JR.,**

aided and abetted by each other and by others known and unknown, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with others known and unknown, to possess with intent to distribute and to distribute 1,000 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); all done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Section 846.

COUNT TWO
CONSPIRACY TO LAUNDER MONETARY INSTRUMENTS

19. Paragraphs 1 through 18 of the Indictment are re-alleged and incorporated fully herein by reference.

20. Beginning on or about May 1, 2011, and continuing through on or about December 24, 2014, in Chatham County, Bulloch County, and other counties in the Southern District of Georgia, and elsewhere, the defendants herein,

**LAMETHEUS TERENCE DOUGLAS,
AKA "MEPHY,"
KAI JACOBIE BOLDEN,
AKA "DWAYNE DEANGELO WALLACE,"
DESHAWN BINAH REILLY,
AKA "DUSHAWN REILLY,"
AKA "LEO HURTAULT,"
AKA "CHARLES EDWARD WHEELER,"
LARRY TURNER DOUGLAS, JR.,
CUREL TAYLOR REILLY,
AKA "CRUEL TAYLOR,"
AKA "CURELL TAYLOR,"
AKA "CRUEL RHONDA TAYLOR,"
SAMORY TOURE WILLIAMS,
AKA "T,"
JOVAN ANTUAN MYRICK,
DELMUS LOCKHART, JR., AND
DARVIN ESQUIRE STRAND, JR.,**

aided and abetted by each other and by others known and unknown, did knowingly and intentionally combine, conspire, and agree together and with each other, and with others known and unknown, to conduct and attempt to conduct financial transactions affecting interstate commerce, with funds which were proceeds of a specified unlawful activity, that is the unlawful dispensation and distribution of marihuana, a Schedule I controlled substance, in violation of Title 21 United States Code, Section 841(a)(1), and which the defendants knew to be the

proceeds of some form of unlawful activity, and did conspire to do so with the intent to promote the carrying on of the aforesaid specified unlawful activity, to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1956(a)(1)(B)(ii); all done in violation of Title 18, United States Code, Sections 2 and 1956(h).

FORFEITURE ALLEGATION

21. Upon conviction of the Title 21 offense set forth in Count One of this Indictment, the defendants,

**LAMETHEUS TERENCE DOUGLAS,
AKA "MEPHY,
KAI JACOBIE BOLDEN,
AKA "DWAYNE DEANGELO WALLACE,"
DESHAWN BINAH REILLY,
AKA "DUSHAWN REILLY,"
AKA "LEO HURTALT,"
AKA "CHARLES EDWARD WHEELER,"
LARRY TURNER DOUGLAS, JR.,
CRUEL TAYLOR REILLY,
AKA CRUEL TAYLOR,
AKA CURELL TAYLOR,
AKA CRUEL RHONDA TAYLOR,
SAMORY TOURE WILLIAMS,
AKA "T,"
JOVAN ANTUAN MYRICK,
DELMUS LOCKHART, JR.,
BRIAN DONIVAN ULMER,
VICOBRI ROYKIAM MILLER
AKA "COBY," AND
DARVIN ESQUIRE STRAND, JR.,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all of their right, title and interest in and to any property, real and personal, (1) constituting or derived

from any proceeds the defendants obtained, directly or indirectly, as the result of such violation and all property traceable to such property; (2) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

22. Upon conviction of the offense in violation of Title 18, United States Code, Section 1956(h) set forth in Count Two of this Indictment, the defendants,

**LAMETHEUS TERENCE DOUGLAS,
AKA "MEPHY,"
KAI JACOBIE BOLDEN,
AKA "DWAYNE DEANGELO WALLACE,"
DESHAWN BINAH REILLY,
AKA "DUSHAWN REILLY,"
AKA "LEO HURTALT,"
AKA "CHARLES EDWARD WHEELER,"
LARRY TURNER DOUGLAS, JR.,
CRUEL TAYLOR REILLY,
AKA "CRUEL TAYLOR,"
AKA "CURELL TAYLOR,"
AKA "CRUEL RHONDA TAYLOR,"
SAMORY TOURE WILLIAMS,
AKA "T,"
JOVAN ANTUAN MYRICK,
DELMUS LOCKHART, JR., AND
DARVIN ESQUIRE STRAND, JR.,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property.

23. The property to be forfeited includes, but is not limited to, a sum of money equal to (1) the proceeds the Defendant obtained directly or indirectly as a result of the Title 21 offenses charged in this Indictment, (2) the value of the property used or intended to be used to facilitate such offenses, and/or (3) the value of all property involved in the money laundering conspiracy charged in this Indictment; that is, a minimum of \$8,000,000 in United States dollars, and all property traceable thereto.

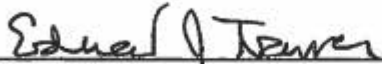
24. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants:

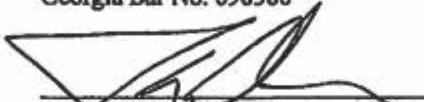
- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

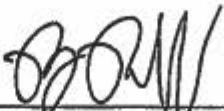
it is the intent of the United States, pursuant to the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), either standing alone or as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the said defendants up to an amount equivalent to the value of the above-described forfeitable property.

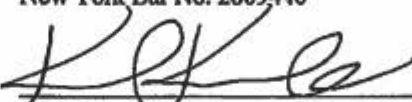
A True Bill.

Foreman


Edward J. Tarver
United States Attorney
Georgia Bar No. 698380


James D. Durham
First Assistant United States Attorney
Georgia Bar No. 235515

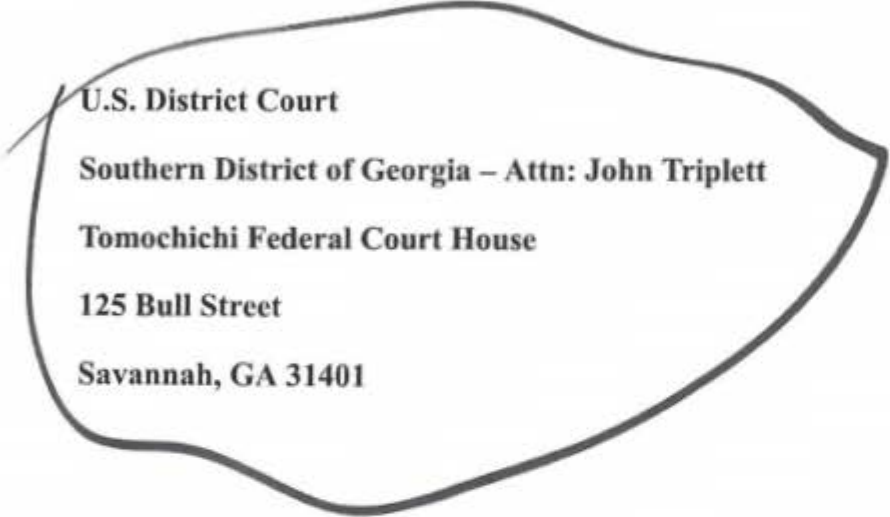

Brian T. Rafferty
Assistant United States Attorney
New York Bar No. 2809440


Karl I. Knoche*
Assistant United States Attorney
Georgia Bar No. 426624
*lead counsel

From: Valorie.Green@Sedgwick.com,
To: errandboyllc1@aol.com,
Subject: service to US Court
Date: Tue, Dec 15, 2020 11:33 am
Attachments: Special Delivery - documents.pdf (2171K),

Good morning,

Per my conversation with Frank L., please see the attached notices to be served to the addresses below:



**U.S. District Court
Southern District of Georgia – Attn: John Triplett
Tomochichi Federal Court House
125 Bull Street
Savannah, GA 31401**

**Office of U.S. Attorney
Bobby L. Christine
Southern District of Georgia
22 Barnard Street Suite 300
Savannah Ga 31412**

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