

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CASE NO. 3:18-CR-78-MGL

UNITED STATES OF AMERICA,

NOVEMBER 16, 2018
9:14 A.M.

Plaintiff,

vs.

RONALD ALLEN WRIGHT;
JORETTA JACKSON,

Defendants.

PAGES 740 THROUGH 960

VOLUME 5
TRANSCRIPT OF CRIMINAL JURY TRIAL
BEFORE THE HONORABLE MARY GEIGER LEWIS
UNITED STATES DISTRICT JUDGE
and a Jury of 12

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I N D E X

Certificate ----- 960

W I T N E S S

ON BEHALF OF THE GOVERNMENT:	PAGE
MATTHEW P. DESMOND	
DIRECT EXAMINATION BY MR. PEARSON	744
CROSS-EXAMINATION BY MS. ZMROCZEK	769
REDIRECT EXAMINATION BY MR. PEARSON	791
RE-CROSS-EXAMINATION BY MS. ZMROCZEK	792
FURTHER REDIRECT EXAMINATION BY MR. PEARSON	793
GOVERNMENT RESTS	794
MOTIONS AT THE CLOSE OF THE GOVERNMENT'S CASE IN CHIEF	795

W I T N E S S

ON BEHALF OF DEFENDANT WRIGHT:	PAGE
RONALD ALLEN WRIGHT	
DIRECT EXAMINATION BY MS. ZMROCZEK	820
CROSS-EXAMINATION BY MR. PEARSON	837
REDIRECT EXAMINATION BY MS. ZMROCZEK	853
CROSS-EXAMINATION BY MR. BROOKER	857
FURTHER REDIRECT EXAMINATION BY MS. ZMROCZEK	869
RE-CROSS-EXAMINATION BY MR. PEARSON	871
FURTHER REDIRECT EXAMINATION BY MS. ZMROCZEK	873
HELEN V. WASHINGTON THOMAS	
DIRECT EXAMINATION BY MS. ZMROCZEK	887
CROSS-EXAMINATION BY MR. PEARSON	890
DEFENDANT WRIGHT RESTS	892
DEFENDANT JACKSON RESTS	892
JURY INSTRUCTION CONFERENCE	895

(Index continues on next page)

1 **I N D E X (cont'd)**

	PAGE
2 CLOSING ARGUMENT BY MR. PEARSON	924
3 CLOSING ARGUMENT BY MS. ZMROCZEK	931
4 CLOSING ARGUMENT BY MR. BROOKER	936
5 REBUTTAL ARGUMENT BY MR. PEARSON	950

6

7

8 **E X H I B I T S**

9 GOVERNMENT EX. NO.:	OFFERED	ADMITTED
10 25 -	743	744
11 29a -	768	768
12 29b -	768	768
13 32 -	923	923

14 **E X H I B I T S**

15 DEFENDANT WRIGHT EX. NO.:	OFFERED	ADMITTED
16 1 -	826	826
17 2 -	771	771
18 3 -	771	771
19 4 -	833	834
20 5 -	833	834
21 6 -	833	834

22 **E X H I B I T S**

23 DEFENDANT JACKSON EX. NO.:	MARKED	OFFERED	ADMITTED
24 7 -	861	861	861
25 8 -	865	865	865

09:14

1 (No Jury, 9:14 a.m.)

2 THE COURT: Good morning. Please be seated. All
3 right. Is there anything that we need to take up before I
4 bring the jury in?

5 MR. PEARSON: Nothing from the government, Your Honor.

6 MS. ZMROCZEK: Nothing, Your Honor. I'm going
7 downhill fast, so I'm trying to keep it together.

8 THE COURT: All right. Well, I hope you feel better.
9 Is there anything we can do to --

10 MS. ZMROCZEK: I called my doctor last night, which he
11 loves when I do that. He said he could give me a shot, but he
12 couldn't do it last night.

13 THE COURT: Well, if you need a break or something,
14 let me know.

15 MS. ZMROCZEK: All right.

16 MR. BROOKER: We're fine, Your Honor.

17 THE COURT: Okay. All right. Then let's bring the
18 jury in.

19 (Jury Present.)

20 THE COURT: Good morning, ladies and gentlemen.

21 JURY: Good morning.

22 THE COURT: All right. Mr. Pearson.

23 MR. PEARSON: Thank you, Your Honor. Prior to calling
24 Agent Desmond to the stand, by agreement of the parties, the
25 government will enter into evidence Government's Exhibit

09:15 1 No. 25. These are the Wells Fargo bank records for Ronald
2 Wright.

3 THE COURT: All right. They're admitted. You said
4 25?

5 MR. PEARSON: 25.

6 THE COURT: Yes, okay.

7 MR. PEARSON: At this time, the government calls
8 Special Agent Matt Desmond to the stand.

9 COURTROOM DEPUTY: Please raise your right hand.
10 State your name for the record.

11 THE WITNESS: Matthew P. Desmond.

12 MATTHEW P. DESMOND, GOVERNMENT WITNESS, SWORN

13 COURTROOM DEPUTY: Thank you. Have a seat in the
14 witness box.

15 DIRECT EXAMINATION

16 BY MR. PEARSON:

17 Q. Good morning, Agent Desmond.

18 A. Good morning.

19 Q. What agency do you currently work for?

20 A. I work for the Federal Bureau of Investigation.

21 Q. And how long have you worked for the FBI?

22 A. It will be 19 years in February.

23 Q. And what kind of work do you do for them?

24 A. I'm assigned to the Columbia field division's joint
25 terrorism task force.

09:16 1 Q. Is that criminal investigations?

2 A. It is.

3 Q. And if you could, during the course of your employment
4 there with the FBI, did you ever have the occasion to become
5 involved in the investigation of Ronald Wright?

6 A. I did.

7 Q. Please explain to the jury how you became involved in that
8 investigation.

9 A. Okay. In -- around the time April 2015, we started getting
10 various pieces of information in from just different things
11 that we hear from confidential sources to the FBI, from
12 different agencies that we work with, in regards to some of
13 this type of activity.

14 We had learned that he had been filing or part of filing
15 different kinds of documents with different creditors and
16 lenders and things of that nature, DOR had reported he had been
17 involved with a person in Myrtle Beach that had been involved
18 in a significant health care fraud investigation, helping him
19 eliminate debt.

20 As we started looking into him, it looked like he was
21 somebody that instead of just somebody that files paperwork
22 with certain things, he was assisting people with filing
23 paperwork and teaching them how to do that or showing them or
24 doing it for them.

25 Q. And when you say "he," who are you talking about?

09:18 1 A. Ronald Wright.

2 Q. So you said that the investigation started by some
3 complaints that you had received of Mr. Wright being involved
4 in some frivolous filings with other individuals.

5 A. Correct.

6 Q. Once you had that information, what did you do?

7 A. Once we started getting that, we opened a preliminary
8 investigation, we start looking for things as to how he
9 conducts his business, who he might be working with, other than
10 what was already provided to us.

11 From that, just general searches, we had determined that he
12 had been involved in some other kind of businesses with
13 somebody down in the Aiken area, to which this person had
14 posted online some unflattering things about their relationship
15 in the business world. We thought we'd go talk to him and find
16 out what was going on.

17 From that, we were referred to some other people, because
18 he wasn't involved in -- necessarily in those frivolous filings
19 and things that were going on.

20 Q. Again, when you say "he," who are you talking about?

21 A. Oh, Ronald Wright, Ronald Wright, sorry.

22 Q. Okay.

23 A. So I ended up talking to one of the other witnesses, Lee
24 Barron, and his wife as a result, and found out a lot more
25 about what was going on and how he was conducting his business.

09:19 1 Q. And again, how did you become in contact with Mr. Barron?

2 A. The person that had had those -- that business relationship
3 with Mr. Wright, he had said these people had went to
4 Mr. Wright for the assistance with their mortgage and things
5 like that, and they might be a better person to talk to.

6 Q. All right.

7 A. So we went and spoke with them.

8 Q. And based on that referral, you went and contacted
9 Mr. Barron.

10 A. That's correct.

11 Q. All right. Now, Agent Desmond, you've heard -- you've been
12 in the courtroom to hear all of this testimony. If you could,
13 please explain to the jury what happened and how you developed
14 Mr. Barron as a source.

15 A. Once we spoke to him, we learned that he had been working
16 with Mr. Wright for quite some time and that he was still
17 engaged with him at that point. He seemed very cooperative and
18 eager to help.

19 At that point we started to talk to him, maybe you could
20 assist us in the investigation in a confidential capacity, and
21 then we go through various steps to recruit them as a
22 confidential informant, or human source, as we call them.

23 So as a source, we opened him and his wife as well so that
24 he could continue that relationship with Mr. Wright and we
25 could determine how he was conducting his business.

09:20 1 Q. And during this interview with Mr. Barron, you said that he
2 was cooperative and seemed willing to help. At this time, did
3 you discuss paying him for helping out in the investigation?

4 A. We did not.

5 Q. You said you opened both he and his wife. Why did you do
6 that?

7 A. They both had seemed to be visiting Mr. Wright together.
8 Over time, it appeared that because of Ms. Barron's job, she
9 wouldn't be able to do it or wasn't as engaged as much as her
10 husband, so we terminated that relationship with her and just
11 worked with Mr. Wright -- or Mr. Barron, sorry.

12 Q. And once Mr. Barron agreed to help, what did you ask him to
13 do for you?

14 A. Basically just continue that relationship and report on it.
15 You know, go to Mr. Wright's office, talk to them, learn as
16 much from him about how he conducts his business as he does.
17 He had already been engaged in having documents mailed to him
18 by Mr. Wright, that Mr. Wright wanted him to mail back.

19 We suggested he just go to the office and do that and then
20 talk to them about how they conduct their business and to
21 confirm that business is conducted from that location and that
22 documents from that business are stored there in that location.

23 Q. And was Mr. Barron able to do all these things for you?

24 A. He was.

25 Q. And once Mr. Barron provided you with that information,

09:21 1 what did you do next?

2 A. Well, we continued our investigation, confirming some of
3 the other things we had learned, and then we prepared a search
4 warrant for the business at Money Solutions where Mr. Wright
5 worked.

6 Q. And for those individuals who may not be familiar with the
7 process, what did you do to get your search warrant?

8 MS. ZMROCZEK: Your Honor, may we approach?

9 THE COURT: Yes.

10 (Sidebar Conference:)

11 MS. ZMROCZEK: Your Honor, this is kind of what we
12 discussed before. You know, I understand that he's going to
13 talk about, you know, how he has to present evidence to a
14 judge, but my concern is that, you know, just because a judge
15 signs off on it, that that's a much lower standard. I guess I
16 need to make sure that that comes out.

17 MR. PEARSON: Your Honor, this is not particularly
18 important. As long as the defense is not going to ask any
19 questions about what they said or did in order to get that
20 search warrant, as long as they're not going to challenge it, I
21 don't see any reason to talk about it.

22 MR. BROOKER: There wouldn't be any reason to
23 challenge it because anything that was obtained as a result of
24 that search warrant is (inaudible.)

25 (Reporter clarification.)

09:23 1 MR. BROOKER: What I said is, is that there would be
2 no need to challenge the search warrant because everything that
3 was obtained as a result of that search warrant is already into
4 record.

5 MR. PEARSON: Well, I don't like to make assumptions
6 about the defense, but as long as they're not going to ask any
7 questions about it, I won't either.

8 THE COURT: Okay.

9 MS. ZMROCZEK: Yeah, and if I open the door or
10 something, they can comment.

11 THE COURT: All right. Very good.

12 (Before the Jury.)

13 BY MR. PEARSON:

14 Q. Agent Desmond, I believe you said that you went and you
15 applied for and received a search warrant. Were you able to
16 serve that search warrant on Money Solutions?

17 A. We were.

18 Q. And please explain to the jury what happened when you
19 served the search warrant.

20 A. Basically, once we had the search warrant, we prepare and
21 plan an operation to conduct that search warrant so that
22 everybody's safe and, you know, we have enough people to do
23 what we need to do and as quickly as we can do it.

24 So with that, there were about 13 agents. Half of us were
25 IRS agents and half FBI or FBI task force personnel. We go to

09:24 1 the location. One person will remain outside the main office
2 building. The local police were called because you require
3 them to be present when we do these things. One stood in the
4 hallway outside the business. A few of them went in.

5 We secured the business, served the search warrant, and we
6 had six people in that, broken down into two -- or three
7 two-man interview teams to conduct the interviews we knew we
8 needed to conduct, and five people to search the business and
9 collect all the documents you see in the back of the courtroom
10 there.

11 Q. And you indicated just a moment ago that part of the search
12 warrant team was there to interview individuals. Who was there
13 when you arrived?

14 A. When we arrived, there were a few people in the office.
15 Mr. Wright was present. Kendra and Linda Jackson were present.
16 Their mother, Patricia Sellers, was present. There was a
17 client, Makeshia Glover, there, and I'm not sure if there was
18 anyone else there at that time.

19 Q. And during the course of the -- serving that search
20 warrant, you indicated that Mr. Wright was there. Did you have
21 the opportunity to approach Mr. Wright for an interview?

22 A. We did. After serving the search warrant, we asked
23 Mr. Wright if he'd be willing to speak with us and he agreed to
24 speak with us and we sat in his office and we talked.

25 Q. And when you say "we sat in his office," who was there with

09:25 1 you?

2 A. Myself and Agent Davis with the IRS.

3 Q. So yourself, Agent Davis, and Mr. Wright.

4 A. Yes.

5 Q. All right.

6 A. And because there was a search going on, people would come
7 and go from the office, collecting things.

8 Q. And collecting things we have behind us?

9 A. Correct.

10 Q. All right. Agent Desmond, if you could, please explain to
11 the jury your interview process. How do you conduct interviews
12 in these circumstances?

13 A. Typically, we start kind of at the beginning, learn a
14 little bit about the person, where they're from, how they've
15 arrived at where they are.

16 You know, we asked Mr. Wright about his background. He
17 told us he was from Georgetown originally, that he went to high
18 school there, and he talked about his eye issues, that when he
19 was younger he had problems with his eyes, had to have surgery.
20 That he entered high school late as a result of that. Entered
21 into a vocational program as part of his high school.

22 Eventually graduated and was able to become an electrician,
23 worked as an electrician for a few years. Then had his own
24 electrician's business, where he claimed to have several trucks
25 and crews that worked for him. But because of his failing

09:26 1 eyesight, he had to leave that behind and then he said he got
2 into the networking business.

3 Q. Networking business, what did that mean?

4 A. We asked him about that. What he seemed to describe to us
5 was common with what we considered a pyramid scheme. We asked
6 him about that. He said it was absolutely not a pyramid
7 scheme, even though that's what it appeared to be. He said
8 they went from the networking business, kind of went into the
9 profit clicking thing, which I think has been described before.

10 Q. Did he explain to you what the profit clicking was?

11 A. Basically it was, you could join in with these groups.
12 There was a website you could go into and then get online and
13 then you click on certain things from within those websites
14 that raised the profile of whatever product or service is being
15 provided.

16 So if you were to Google "I need a lawyer in" wherever, it
17 would increase their profile, more hits. It shows up first in
18 the feed kind of thing, is my understanding of that, just based
19 on what I've learned here in this investigation.

20 Q. Now, with that profit clicking, did he tell you that this
21 was just him or him and other people?

22 A. A lot of other people involved with that. And just like
23 with the networking thing, as the markets become saturated, you
24 run out of people to enter these things, they -- people -- you
25 know, it stopped working, stopped making money, so he had to

09:27 1 figure out something else to do.

2 He noticed a lot of his people that he worked with in those
3 areas were -- fell upon hard financial times and they would
4 discuss that. He advised several of them had come to him
5 seeking his advice on financial matters.

6 He told us he had began researching online ways to
7 eliminate debt and different things. He'd watch YouTube
8 videos. He would attend seminars if he could find them. He
9 would, you know, just research things online at the Library of
10 Congress, things that way, and from that he had figured out his
11 process, or program.

12 Q. Did he explain to you why individuals involved in his
13 network business or his profit clicking would approach him out
14 of the blue about their mortgages?

15 A. He made no reference to that.

16 Q. Okay. So I believe you just testified that he said he
17 looked up some things over the internet and that he -- well, he
18 learned some things over the internet. Did he explain to you
19 how that led to his formation of this Money Solutions business?

20 A. He had made remarks to the effect that he had learned the
21 truth of things and then developed this process by which he
22 could help people eliminate their debt. I'm not sure if he was
23 helping people, but then it kind of turned into Money
24 Solutions, which he opened in 2013.

25 Q. Okay.

09:29 1 A. You know, he obtained office space. He had a staff which
2 changed over one or two people over time, but ended up like it
3 was when we arrived, with Kendra and Linda Jackson as full-time
4 employees and Patricia Sellers, their mother, as a part-time
5 employee.

6 Q. And during the course of this discussion with Mr. Wright,
7 did he offer explanations about how this process worked?

8 A. He went into that to great extent. You know, he just
9 continued to talk about the legal things and the gibberish and
10 the nonsensical things that are typical to schemes like this
11 that we're familiar with, you know, through our work and
12 experience.

13 And he went through that for a bit and then we could
14 interject where we could to get him, you know, back to where we
15 could ask him questions that we were interested in knowing the
16 answers to.

17 Q. All right. During the course of the conversation with
18 Mr. Wright, did he explain to you anything about being an
19 attorney or acting as an attorney for others?

20 A. He said that Money Solutions did not offer an attorney, but
21 they were -- in fact, could act as a private attorney general
22 for their clients in court and help them in court with that.

23 Q. So he told you that he helped people in court as a private
24 attorney general.

25 A. He said that Money Solutions offered that as part of what

09:30 1 they could do. He didn't say he specifically, but he said that
2 was something that they could do. I'm not sure who else would
3 do that other in that office but him, unless he brought
4 somebody in, but he didn't refer to that when we spoke to him.

5 Q. Did he offer any explanation to you as to what the
6 difference is between an attorney and a private attorney
7 general?

8 A. He did not.

9 Q. Agent Desmond, did Mr. Wright give you any information
10 concerning his company's service of IRS or tax debt?

11 A. We asked him about his use of IRS documentation and filing
12 things with the IRS. He said that he used IRS forms in his
13 process to -- along with other documents that they would
14 prepare there in the office to provide to people to help with
15 the debt elimination scheme that he had.

16 And he would send those to different agencies, the lenders
17 and creditors or whomever. We asked him, did he send those to
18 the IRS. He claimed he did not because they should already
19 know about that, was his quote, I think.

20 Q. So he told you he didn't send things to the IRS.

21 A. Not those things.

22 Q. Not those things.

23 A. Correct.

24 Q. Right. All right. Agent Desmond, did Mr. Wright tell you
25 anything about the number of clients or the level -- or I guess

09:32 1 or the volume of his business?

2 A. I believe he said that he had about over -- a little over a
3 hundred customers making between 4,000 and \$7,000 a month.

4 Q. And when you said -- were the customers making between 4
5 and 7 a month or was he making between 4 and 7 a month?

6 A. Money Solutions was making that money, yes.

7 Q. All right. Now, we'll go back to this interview, but I
8 just want to ask you one question outside of that. Agent
9 Desmond, after he told you that he had approximately a hundred
10 clients or so, did you continue your investigation and try to
11 locate these individuals?

12 A. We did.

13 Q. And did you conduct interviews for them?

14 A. Yes, we conducted multiple interviews.

15 Q. And if you had to estimate, how many interviews do you
16 think you did for Money Solutions' clients?

17 A. 38, 39, close to 40 interviews.

18 Q. And based on those -- were those interviews with the
19 same -- some of the same individuals that testified here in
20 court about this --

21 MS. ZMROCZEK: Your Honor, may we approach?

22 (Sidebar Conference:)

23 MS. ZMROCZEK: What it sounds like he's trying to ask
24 him, Your Honor, the way I understood the question or the way
25 that I feel like the answer is going to come out, which is why,

09:33 1 once the bells ring, I can't unhear it, but he asked him how
2 many people did you interview, 38, 39, 40, were they the same
3 types of interviews that -- if they want to bring 38, 39, 40
4 people in here, they certainly can, but to try to bolster --
5 you know, if he's going to insinuate or infer that they all
6 said the same things as all of these other people --

7 MR. PEARSON: I'm going to stop you right there. That
8 wasn't the question.

9 THE COURT: I don't think -- yeah. I mean, I think
10 you can get what you want without doing that.

11 MR. PEARSON: The question is only -- it's something
12 very different. I would imagine, because most people do argue
13 investigative techniques, that they're going to say the exact
14 same thing that you just said, they didn't bring 39 people
15 here. My question is only, did you go talk to them? Did you
16 talk to the people that testified here today?

17 MS. ZMROCZEK: And that, I'm okay with.

18 THE COURT: All right. Okay.

19 MS. ZMROCZEK: But if it's the next question, did they
20 all say the same thing, then I'll have a problem.

21 MR. PEARSON: Clearly I can't do that, because that
22 would be hearsay.

23 MS. ZMROCZEK: Of course. Thank you.

24 (Before the Jury.)

25 BY MR. PEARSON:

09:34 1 Q. So Agent Desmond, I believe your testimony just a moment
2 ago was that you went and interviewed, I think you said, 39
3 or -- 39 to 40 people?

4 A. In that neighborhood, yes.

5 Q. Yes. And did you interview the same individuals -- all of
6 the individuals that came and testified as clients of Money
7 Solutions?

8 A. Yes, all of those, yeah.

9 Q. And based on -- based on your speaking with Mr. Wright and
10 going through the records, is that how you identified those
11 individuals?

12 A. Correct.

13 Q. All right. Now, going back to your interview with
14 Mr. Wright, Agent Desmond, did he give you any information
15 about what he charged or how he came up with fees for
16 individual people?

17 A. He did. He said that, you know, there were some fees
18 involved, but that people paid what they could pay, so he would
19 attempt to determine what their ability to pay was and then
20 would take what they could give him to provide those services.

21 Q. So he charged them what he thought he could get out of
22 them.

23 A. Correct.

24 Q. Now, Agent Desmond, did you inquire of or did Mr. Wright
25 give you any information about the success of his so-called

09:36 1 process?

2 A. He told us that his process had not yet worked for anyone
3 that he had helped, but he knows it worked because other people
4 have told him it worked.

5 Q. So just to be very clear on this point, when you
6 interviewed Mr. Wright on November 20th of 2015, he told you
7 that he had never been successful in doing this.

8 A. Correct.

9 Q. But that others had, and so he knew it worked.

10 A. Other people had told him.

11 Q. That other people had hold him that it worked.

12 A. Correct.

13 Q. Agent Desmond, did he -- did Mr. Wright indicate to you
14 that he had informed his clients of his inability to get this
15 system to work?

16 A. He made no reference to that during the interview, no.

17 Q. Agent Desmond, I am going to show you what has been marked
18 into evidence as Government's Exhibit No. 7. Do you recognize
19 that one?

20 A. I do.

21 Q. Is this one of the documents -- yeah, is this one of the
22 documents that you -- or that was found at the search warrant?

23 A. It was. It was hanging on the wall in the main part of the
24 office where people would enter.

25 MR. PEARSON: Can we pull up 7?

09:37

1 BY MR. PEARSON:

2 Q. Now, this was hanging up on the wall and you had -- you
3 just testified that Mr. Wright admitted that this had never
4 actually worked, but this document appears to say that the
5 mortgage is deemed satisfied. Did you ask Mr. Wright any
6 questions about this?

7 A. We did. When we were pursuing that line of questioning, he
8 advised that it had helped Bobby Sass, who lived down in the
9 Summerville area, and that it helped her get free and clear on
10 her mortgage. After further questioning, it was determined
11 that even though she was using his help for the process, she
12 continued to pay her mortgage payments as the process was
13 ongoing.

14 Q. And when you say she continued to pay her mortgage, you
15 mean with real actual American money?

16 A. Correct.

17 Q. Agent Desmond, during the course of the investigation, did
18 you look into this --

19 MR. PEARSON: You can close that.

20 BY MR. PEARSON:

21 Q. Did you continue to look into this so-called success story
22 with the Sasses?

23 A. We did.

24 Q. And what did you find out?

25 A. It seems as though the -- you know, the satisfaction -- or

09:38 1 the ruling in that court was because Wells Fargo failed to
2 appear in court that day, so they ruled in her favor. Upon
3 speaking, it --

4 MS. ZMROCZEK: Objection, Your Honor, if he's going to
5 talk about what somebody else said.

6 A. Okay.

7 BY MR. PEARSON:

8 Q. That's fine. Did you find anything specifically about this
9 in the public record?

10 A. In the public record, it appears that the home is still
11 under foreclosure.

12 MS. ZMROCZEK: Your Honor, may we approach?

13 (Sidebar Conference:)

14 MS. ZMROCZEK: Your Honor, there has been no proof
15 that the home is still under foreclosure, so either they need
16 to produce that document, they need to have somebody here, or
17 that needs to be stricken from the record and the jury needs to
18 be instructed not to --

19 MR. PEARSON: Your Honor, we had a long conversation
20 yesterday with the defense about the use of public records. I
21 believe there are dozens and dozens of public records that the
22 defense is intending to put in.

23 THE COURT: Can't I take judicial notice of that?

24 MR. PEARSON: You can.

25 MS. ZMROCZEK: Well, as soon as they put it in, that's

09:39 1 fine.

2 THE COURT: We don't have the actual -- we don't have
3 any documents?

4 MR. PEARSON: I mean, if you want me just to print it
5 off the internet, we can. Frankly, this is just this witness
6 saying, I continued to look into this.

7 MS. ZMROCZEK: But what this witness said is that --

8 THE COURT: I think he said that the home was still in
9 foreclosure.

10 MS. ZMROCZEK: It's still in foreclosure, uh-huh.

11 THE COURT: And that's what he knows.

12 MS. ZMROCZEK: Well, that's what he believes. And so
13 I'll double-check it at the break. I need to be able to listen
14 to it, but...

15 THE COURT: Yeah, I think he can say that, based on
16 what he's looked at, the home is still under foreclosure.

17 MS. ZMROCZEK: Okay.

18 THE COURT: If you're still not happy --

19 MS. ZMROCZEK: I'll look at it.

20 THE COURT: -- then we'll make him pull the document.

21 MR. PEARSON: Yeah.

22 MS. ZMROCZEK: Thank you.

23 (Before the Jury.)

24 BY MR. PEARSON:

25 Q. So Agent Desmond, you testified just a moment ago about

09:40 1 looking up or continuing to investigate -- continuing to
2 investigate this Sass -- this Sass mortgage. After Mr. Wright
3 told you about the Sasses and how they continued to actually
4 pay their mortgage with real American money, did you ask him
5 any questions concerning sort of advertising or how he spread
6 the word of his business?

7 A. He said his business was spread word of mouth.

8 Q. Did he give you any information about how he put forth
9 information concerning his process?

10 A. Yes. He would hold weekly teleconferences where people
11 could call in and listen to him and other people about the
12 process or what services he was offering and how it was -- how
13 it was to work, that sort of thing. He said it was an 800
14 number they would call in to. He invited us to call in to that
15 and listen, 'cause previous teleconferences had been recorded
16 and archived and you could pull those up.

17 Q. Agent Desmond, you had said before that you were initially
18 informed of this case through a variety of different sources.
19 Did you ask Mr. Wright any questions sort of about the
20 information you had that started the investigation?

21 A. We did. We talked to him about Dr. Cornelius Beck, who was
22 a dentist down in the -- on the coast from Georgetown to Myrtle
23 Beach, has a practice down there. He was under investigation
24 by the IRS and FBI for other reasons.

25 Ronald had mentioned that he knew Mr. Beck for quite some

09:42 1 time -- or Dr. Beck for quite some time when he performed some
2 electrician work in one of his offices down in Georgetown.
3 They became kind of friends. He knew that Mr. Beck had fallen
4 upon hard financial times and offered his services to him to
5 help eliminate his debt.

6 Q. Now, you also said that when you arrived for the search
7 warrant, that a Makeshia Glover was there. When you found
8 Makeshia Glover there, did that set off any red flags or
9 suspicions to you?

10 A. It did.

11 Q. And why?

12 A. Currently, at the time, Makeshia Glover and her family had
13 been indicted and were awaiting trial for defrauding the IRS of
14 millions of dollars.

15 Q. Did you ask Mr. Wright any questions about Ms. Glover and
16 her family?

17 A. I did. He advised that he knew them. He had met Makeshia
18 and her father, Jefford Henry, who he knew as Malik Bey, at a
19 seminar conference where tactics of this sort are discussed for
20 the debt elimination ideas, and that they had begun speaking
21 with each other as peers. He did begin helping him out. He
22 didn't charge him, but that he helped him out with some of the
23 trouble he had been having with the federal government.

24 Q. So Mr. Wright told you that he had helped them with their
25 federal government trouble, although he didn't charge them.

09:43

1 A. Correct.

2 Q. All right. Based on your discussions with Mr. Wright, did
3 you discover or find files for Makeshia Glover or the Henrys in
4 the files at Money Solutions?

5 A. We did.

6 Q. Now, there has been some questions and a few answers using
7 the term sovereign citizen. When you talked to Mr. Wright, did
8 he give you any information about being a sovereign citizen?

9 A. We asked him about that. He advised that he was not a
10 sovereign citizen, that he was an American citizen, and as such
11 should be considered sovereign, but that he was not a sovereign
12 citizen.

13 Q. Agent Desmond, based on the investigation into sort of this
14 debt elimination program that Mr. Wright had, did you do any
15 further investigation, looking into the personal debts of
16 Mr. Wright?

17 A. We did. Generally, with these sorts of investigations we
18 will go to, say, the Registrar of Deeds office and inquire
19 about them, because they do file tremendous amounts of
20 paperwork through those types of offices, to see what there was
21 for him, and they provided us approximately 38 documents
22 related to tax liens that were against Mr. Wright.

23 MS. ZMROCZEK: And Your Honor, we have -- this is
24 subject to our previous objection as well.

25 THE COURT: Well, let's mark it first and see what it

09:45 1 is, can we?

2 MR. PEARSON: Your Honor, this is Government's
3 Exhibits 29a and 29b, the group of tax liens that Agent Desmond
4 just talked about.

5 (Sidebar Conference:)

6 MS. ZMROCZEK: Your Honor, these are the ones that we
7 talked about that were outside of the scope of the
8 investigation or the -- not the investigation.

9 THE COURT: The indictment?

10 MS. ZMROCZEK: Thank you. I'm just like, I'm trying,
11 I'm really trying. And they dealt with -- some were his wife,
12 some were him, some -- a lot of them were this business that
13 didn't have anything to do with this. I just don't see the
14 relevance to --

15 THE COURT: Well, I don't know what your question is
16 going to be, but I would suspect it would be that if you have a
17 program that you -- that works, that you are selling to other
18 people --

19 MR. PEARSON: That you believe in.

20 THE COURT: -- that you would use it on your own debts
21 to try to eliminate them. So I do think it's relevant.

22 MS. ZMROCZEK: Okay.

23 (Before the Jury.)

24 BY MR. PEARSON:

25 Q. I'm going to show you what has been marked as Government's

09:46 1 Exhibit Nos. 29a and 29b. Do you recognize those?

2 A. I do.

3 Q. Are those the tax liens that you found filed against
4 Mr. Wright?

5 A. Yes.

6 MR. PEARSON: Your Honor, at this time, the government
7 would move Government's 29a and 29b into evidence.

8 THE COURT: Okay. They're admitted over objection of
9 Defendant Wright.

10 BY MR. PEARSON:

11 Q. Now, Agent Desmond, I'm going to pass these to you. If you
12 could please briefly explain for the jury the nature of those
13 outstanding liens. What are they for?

14 A. They were tax liens levied against him for a previous
15 business he owned called Pay Less Cellular.

16 Q. And are they from the South Carolina Department of Revenue?

17 A. Yes.

18 Q. Agent Desmond, you said that there were 20 -- 38 liens?

19 A. 38.

20 Q. There were 38 liens. Can you tell this jury the time
21 period from which these liens were generated?

22 A. Generally between 2010 and 2015.

23 Q. So from 2010 to 2015, there were 38 liens. Were you able
24 to determine if any of those liens were satisfied?

25 A. Approximately 13 of those were satisfied.

09:48 1 Q. And Agent Desmond -- I'll take those back from you -- based
2 on your investigation, were these liens satisfied by the
3 defendant through the use of an International Bill of Exchange
4 Money Order?

5 A. I don't believe they were. Department of Revenue typically
6 will not take those.

7 Q. Were they paid using a check generated with a closed -- off
8 of a closed bank account?

9 A. They were not.

10 Q. Were they paid with real old-fashioned American money?

11 A. I think they were. That's the only thing they take down
12 there.

13 MR. PEARSON: Agent Desmond, thank you for your
14 testimony. Please answer any questions that the defense has
15 for you.

16 MS. ZMROCZEK: Your Honor, beg the Court's indulgence.
17 (Pause.)

18 CROSS-EXAMINATION

19 BY MS. ZMROCZEK:

20 Q. Agent Desmond, I want to ask where he left off, he talked
21 about closed bank account, you know, was anything paid off of a
22 closed bank account. In fact, the only evidence that you have
23 to show this jury about something being written off a closed
24 bank account came from Kendra Jackson that she did on her own
25 for Joretta Jackson; isn't that correct?

09:49

1 A. Only thing discussed in court, yes.

2 Q. That's all you have, right, on a closed bank account, it
3 came from Kendra Jackson -- excuse me, yeah, Kendra Jackson
4 writing off of a closed bank account for Joretta Jackson.

5 That's what's been presented?

6 A. Presented, yes.

7 Q. Okay. And that's what's in front of this jury to consider.

8 A. Currently, yes.

9 Q. And that was Kendra Jackson on her own without the
10 knowledge of Mr. Wright.

11 MR. PEARSON: Objection, that calls for speculation.

12 THE COURT: Yes.

13 MS. ZMROCZEK: Okay. Let me rephrase the question,
14 Your Honor.

15 BY MS. ZMROCZEK:

16 Q. Mr. Wright is not charged on those counts, is he?

17 A. No, I don't believe that he is.

18 Q. Thank you.

19 I want to talk a little bit about -- you said -- you talked
20 about Ms. Glover and how that had raised some concerns for you,
21 and obviously you sat here through the testimony and heard
22 every person ask why Mr. Wright didn't tell them that he had
23 clients that were arrested criminally, right? You've heard
24 those questions?

25 A. I heard the questions, yes.

09:50 1 Q. Okay. And those clients that you were referring to were
2 Ms. Glover and her family, right?

3 A. Correct.

4 Q. Okay. I'm going to show you what's been marked as Defense
5 Wright -- Defendant Wright's Exhibits 2 and 3 and ask if you
6 recognize those.

7 A. I've seen these before, yes.

8 Q. Okay.

9 MS. ZMROCZEK: Your Honor, at this time we would move
10 Defendant's 2 and 3 into evidence.

11 THE COURT: And what are they?

12 MS. ZMROCZEK: I'm sorry, they're the indictment and
13 superseding indictments in the Glover case.

14 MR. PEARSON: No objection, Your Honor.

15 THE COURT: All right. They're admitted.

16 BY MS. ZMROCZEK:

17 Q. I'm going to let you hold on to these so I can ask you some
18 questions. What are the dates of -- well, first of all,
19 explain to the jury what a superseding indictment is.

20 A. I believe they're indictments that come after original
21 indictments are presented.

22 Q. So what I hear you saying is that you can have an
23 indictment and then if you need to add people or charges, you
24 can do that by a superseding indictment, right?

25 A. Correct.

09:51 1 Q. When was the indictment filed against Ms. Glover and her
2 family?

3 A. Ms. Glover and her family? Let me see.

4 Q. The original indictment. That would be Defendant's 2. It
5 should be up at the top.

6 A. It looks like April of 2015, April 21st.

7 Q. April of 2015.

8 A. And the other, the original, November of 2014.

9 Q. Okay. So the original indictment was 2014 November, and
10 the superseding indictment was April 2015 --

11 A. Yes.

12 Q. -- right? And you can add defendants, right?

13 A. You can.

14 Q. You can add charges?

15 A. You can.

16 Q. Mr. Wright was not added to that.

17 A. No.

18 Q. Okay. And in fact, you said that there was no payment --
19 there were files on Ms. Glover.

20 A. We're going on what Mr. Wright had told us, that they were
21 not charged.

22 Q. Okay. Did you follow up and do any investigation into
23 that?

24 A. We looked.

25 Q. Okay. And what date did you find that they came -- became

09:53 1 involved in his office?

2 A. I don't recall the exact date.

3 Q. Okay.

4 A. We just know that Makeshia was in the office when we
5 arrived.

6 Q. And that was on November 20th of 2013 -- or 2015, right?

7 A. Correct.

8 Q. Okay. And I'm going to show you a page out of Government's
9 4, which these are receipt books that you collected, right?

10 A. They were collected, yes.

11 Q. Or I'm sorry, when I say "you," I mean the government.

12 A. Okay.

13 Q. You were there, correct?

14 A. (No audible response.)

15 Q. Okay. In looking on one of those pages in there, are there
16 receipts written to Ms. Glover and/or her family?

17 A. There's a receipt here for Jeffrey Henry, which is
18 Makeshia's brother, Jefford Henry's son.

19 MS. ZMROCZEK: Okay. And will you flip the page?

20 BY MS. ZMROCZEK

21 Q. And is that the next page?

22 A. Yeah, it's the very next page.

23 Q. Okay. And do you see additional?

24 A. No.

25 Q. Okay. Keep going.

09:54

1 A. No.

2 Q. All right. And what date was that for Mr. Henry?

3 A. Jeffrey Henry, September 2015.

4 Q. Okay. You have -- you don't have any proof or information
5 that Mr. Wright was involved in any of the indictment charges
6 with this group, correct?

7 A. Correct, other than he was helping them with their legal
8 troubles or problems with the federal government.

9 Q. Afterwards.

10 A. Yes.

11 Q. Not as a -- they weren't charged as a result of their
12 interaction or their behavior with Mr. Wright.

13 A. No.

14 Q. And you're not trying to leave the jury with that
15 impression, right?

16 A. No.

17 Q. And so when you -- when the questions are asked, did you
18 tell -- or were you told that former clients or current clients
19 were under investigation, well, the only clients that we're
20 talking about are the Glovers and the Henrys, and that criminal
21 investigation had nothing to do with Mr. Wright.

22 A. I don't believe he was.

23 Q. Okay. Mr. Barron, I would like to talk about him for a
24 little bit. So we heard that you developed him as a source,
25 right?

09:55 1 A. Correct.

2 Q. That's the only source that you paid.

3 A. Yes.

4 Q. Okay. And you developed him in June, or prior to June and
5 you had actual contact with him in June?

6 A. We met him in June. And when you say development, that can
7 occur in an hour or over weeks. This happened very quickly --

8 Q. So you met with him in June.

9 A. -- because he was cooperative. Yes.

10 Q. Sorry. Go ahead.

11 A. That was it.

12 Q. Okay. In June?

13 A. Yes.

14 Q. 2015?

15 A. Yes.

16 Q. And he signed his contract?

17 A. We don't have contracts that we sign. We don't do that.

18 Q. I'm sorry?

19 A. We don't sign contracts with sources.

20 Q. Okay. Did you sign him up as a contract -- or sign him up
21 as a source?

22 A. I opened him a file. Typically when we open a file on
23 somebody, we do what we call admonish them. We tell them
24 what's expected, what they can expect. They agree to that in
25 front of a witness and that is what's documented.

09:56 1 Q. And what did you tell him was expected of him?

2 A. That he be truthful, that he follow our directions, that he
3 doesn't take independent action, that he's not an agent of the
4 U.S. Government. It's a fairly lengthy form with lots of
5 different things. That we're not promising him anything in
6 return for this and that sort of thing.

7 Q. Okay. And so he was -- he was working at the direction of
8 you.

9 A. As things related to Mr. Wright, yes.

10 Q. As things related to Mr. Wright.

11 A. Correct.

12 Q. So that means that on June 26, which is after -- well after
13 he met with you, he produced this document and turned it in to
14 Mr. Wright's office. This is Government's 15.

15 A. Mr. Wright, I believe, produced those documents, or someone
16 in his office did. They mailed those to Mr. Barron at Ronald's
17 request to have those signed and sent back to him. We elected
18 to have Mr. Barron take those to the office instead of putting
19 them in the mail and mailing them.

20 MS. ZMROCZEK: If you could pull up Government's 15
21 for me, please.

22 BY MS. ZMROCZEK

23 Q. I want you to look at the quoted date. Quoted date.

24 A. Okay.

25 Q. What date is that?

09:57

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A. June 26, 2015.

Q. Okay. And that's after you met with him.

A. Yes, at some point.

Q. Okay. And so I want to make sure I understand your testimony. You're saying that Mr. Wright just willy-nilly requested this document?

A. Mr. Barron had a previous relationship with Mr. Wright with his ongoing business with the process. At that time, they were exchanging documents. Mr. Barron would provide him the documents requested from his financial lenders. Mr. Wright would do what Mr. Wright does with those documents and provide them back to his clients. I believe multiple clients testified to that already, that he would -- they would send him paper, he would send them paper, they would sign, or come in and sign, and they would have this exchange ongoing.

Q. Right.

A. This was part of that ongoing exchange. I don't know exactly when all that occurred. I just know that he was taking documents back to him at our direction.

Q. Right. But you can see that the requested date or the quoted date --

A. Yeah.

Q. -- was after they met with you.

A. Yes.

Q. Okay. Mr. -- so November 20th, 2015, the government goes

09:58 1 and takes all of these files, right?

2 A. Correct.

3 Q. Including receipt books.

4 A. Correct.

5 Q. When you do your taxes, what is it that you need to do your

6 taxes?

7 A. I'm not sure what you're getting at.

8 Q. Okay. Do you need your receipt books and your income

9 information to be able to do your taxes?

10 A. I suppose you do. I don't run a business. I don't know.

11 Q. Okay. You took all of his computers.

12 A. Yes.

13 Q. All of his cell phones.

14 A. Yes.

15 Q. And that was November 20th, 2015.

16 A. Correct.

17 Q. Didn't ever give that information back?

18 A. No.

19 Q. And yet waited until January of 2018 to make an arrest?

20 A. Correct.

21 Q. Okay. And so during that time you were generating an

22 investigation?

23 A. We were conducting an ongoing investigation, correct.

24 Q. And you have no information of any other filings that have

25 been presented after November 2015.

09:59 1 A. I'm not sure what you're asking.

2 Q. There are no papers in all of this evidence that indicates
3 that there was anything done by Mr. Wright in regards to Money
4 Solutions after 2015.

5 MR. PEARSON: Objection, Your Honor. May we approach?

6 THE COURT: Yes.

7 (Sidebar Conference:)

8 MR. PEARSON: In an effort to try to keep a clean
9 record, I believe that the defense has asked a question that
10 opens the door to all of the other things that Mr. Wright has
11 done after this indictment. So before she asks this question
12 as to has he done anything else, I want her to understand --

13 MS. ZMROCZEK: I asked him with regard to Money
14 Solutions, but I'll withdraw the question.

15 THE COURT: Okay.

16 MS. ZMROCZEK: That's fine.

17 (Before the Jury.)

18 BY MS. ZMROCZEK:

19 Q. Let me ask a different question, Agent. In two thousand --
20 in early -- I believe you said maybe April of 2015 you started
21 to get this information.

22 A. Correct.

23 Q. Okay. You believed that Mr. Wright was engaged in criminal
24 behavior?

25 A. We believed he was engaged in activities consistent with

10:00 1 sovereign citizen frivolous filings and debt redemption
2 schemes.

3 Q. Okay. Which is filing a lot of paperwork and clogging up
4 the courts and annoying the government, correct?

5 A. Correct.

6 Q. Okay. And in fact, some of the witnesses even gave him
7 money after June of 2015 that we've heard from, right?

8 A. I'm not directly sure. You'd have to show me something. I
9 don't recall off the top of my head.

10 Q. Okay. That's fine. You said that you were told that his
11 business was done by word of mouth, right?

12 A. That's what he had told us, yes.

13 Q. Did your investigation lead you to know that he went out to
14 churches and stalked on people?

15 A. I know he was related to some church things, talking to
16 some church people. I'm not sure about going into churches.
17 Typically he went to places where he was successful with his
18 profit clicking schemes, his networking schemes, or whatever.
19 He went to those people that were already involved in those
20 things, you know, for meeting and potential opportunities with
21 helping them with their debt problems.

22 Q. And now, you say he went to them. Now, are you sure they
23 didn't come to him?

24 A. Depending, both. Some people would call him, based on the
25 word of mouth, I guess. Various ways. It happened in various

10:02 1

ways.

2

Q. And you said it was his profit clicking scheme, but it wasn't his profit clicking scheme.

3

4

A. Okay. A profit clicking scheme he was involved in.

5

Q. As well as Mr. Barron.

6

A. Yes.

7

Q. Okay. Did you go through all of those boxes?

8

A. Part of those boxes. It was a group effort, a lot of

9

boxes. We went through as much of those as needed or as we

10

could, but all of those documents were gone through by someone

11

involved in the investigation.

12

Q. Okay. And Government's 7, you would agree that this paper says deemed satisfied.

13

14

A. Correct, due to Wells Fargo not appearing in court.

15

Q. And it's your understanding or your testimony that through your investigation, that that case is still in foreclosure.

16

17

A. I don't know that -- if it's still in foreclosure, but I

18

know -- I think, from what I read online and public record,

19

that it is in foreclosure. I don't know if it's -- the process

20

with the court's been completed or where that is. It is just

21

general information I found regarding her address online.

22

Q. Okay. Well, as you testify and your information is relied upon, you want to make sure that it's true.

23

24

A. Sure, absolutely.

25

Q. Accurate.

10:03 1 A. As much as I can, looking at something generally online.

2 Q. And correct.

3 A. Correct.

4 Q. So -- and you know how to read a public index, right?

5 A. I'm familiar with it, yes.

6 Q. Okay. And so --

7 MS. ZMROCZEK: And Your Honor, may we approach
8 briefly?

9 (Sidebar Conference:)

10 MS. ZMROCZEK: The public index shows that it is a
11 final order submitted, that case is closed, that it is not in
12 foreclosure. Now, I've sent it to my paralegal to print, so
13 that's kind of what we're waiting on.

14 MR. PEARSON: If she has a good faith basis to say
15 that, I don't object.

16 MS. ZMROCZEK: And I'm going to put it in as well. I
17 mean, I'd like to put it in through him.

18 THE COURT: I understand. I'm just thinking about the
19 fact that it went into foreclosure and the foreclosure was
20 completed, I'm not sure that's all that helpful, but if you
21 want to do it, you can.

22 MS. ZMROCZEK: Not foreclosure was completed. The
23 case is closed because of this order.

24 THE COURT: Okay.

25 MR. PEARSON: Okay.

10:04

1 MS. ZMROCZEK: Yeah.

2 (Before the Jury.)

3 BY MS. ZMROCZEK:

4 Q. So this says "satisfied," meaning the mortgage was
5 satisfied?6 A. I believe the case was satis- -- I'm not sure if it's the
7 mortgage. I'm not quite sure how that is, how that works, with
8 the courts down there.9 MS. ZMROCZEK: Okay. Do you mind pulling up No. 7 for
10 me?

11 BY MS. ZMROCZEK:

12 Q. Can you read that for me?

13 A. Plaintiff's mortgage is deemed satisfied.

14 Q. Deemed satisfied. And that is because Wells Fargo didn't
15 show up, right?

16 A. Correct.

17 Q. But they were properly served?

18 A. That is what appears there.

19 Q. Right. And so the mortgage is deemed satisfied?

20 A. By that, yes.

21 Q. By that. And it's your indication that your research says
22 the public index says something different?23 A. Not public index. I didn't look at the public index
24 specifically.

25 Q. Okay.

10:05 1 A. But I know that -- I don't believe Wells Fargo considered
2 that debt satisfied at that point.

3 Q. Okay.

4 MS. ZMROCZEK: And Your Honor, we can address that
5 later.

6 BY MS. ZMROCZEK:

7 Q. He told you about the teleconferences?

8 A. He did.

9 Q. And you had already had Mr. Barron, part of the things that
10 you paid him for -- now, I want to talk about the payment real
11 quick. Explain how this payment showed up. All of a sudden
12 you just decided to start handing out cash periodically? Can
13 you tell us what happened?

14 A. Typically what happens is we engage a source, they begin
15 working for us. In Mr. Barron's case, he came willingly. He
16 would have to travel from Aiken to Columbia often to visit with
17 Mr. Wright or do things that we asked him to do. He incurred
18 expense, he spent his time, so we paid him for his time and his
19 expense.

20 Q. And you just did that without even -- you just decided one
21 day -- and did you do it in a lump sum?

22 A. No.

23 Q. Okay. When did you make these payments?

24 A. Typically he would do something for us, he would travel,
25 incur expense, spend his time doing things, making the

10:06 1 recordings or what have you, and then we'd, you know, decide,
2 okay, let's give him some money to kind of pay for his time and
3 his expense.

4 Q. And they're expected to claim that income? That's income,
5 right?

6 A. He's advised to claim that, yes.

7 Q. Did you follow up on that?

8 A. No.

9 Q. Okay. You said make recordings. I want to talk about that
10 for a little bit. You actually had him do several recordings,
11 correct?

12 A. Correct.

13 Q. You had him record the entire podcast.

14 A. Yes.

15 Q. Okay. But we didn't play that, right?

16 A. No.

17 Q. Okay. And you all -- and so what's in evidence right now
18 is just the portions that the government put in, right?

19 A. I believe they're all in, but -- to listen to, but we
20 selected ones that we needed or...

21 Q. Okay. You just selected the ones that you needed, right?

22 A. The ones that were pertinent, yes.

23 Q. Okay. There were other recordings that Mr. Barron had
24 done.

25 A. Correct.

10:07 1 Q. And he had conversation with him and Ms. Wright [sic]?

2 A. Correct.

3 Q. Because there were times that Ms. Wright [sic] was the only
4 one in the office -- or let me rephrase that -- that
5 Ms. Wright [sic] was in the office and that Ronald Wright
6 wasn't.

7 MR. PEARSON: Objection.

8 BY MS. ZMROCZEK:

9 Q. Sorry, Ms. Jackson, Kendra Jackson.

10 A. I'm sorry? Go ahead.

11 Q. There were times that Kendra Jackson was in the office
12 working that Ronald Wright was not in the office.

13 A. I don't recall off the top of my head. Not in that
14 particular office. The office was partitioned into three
15 areas.

16 People come, Mr. Wright's on the phone or doing something
17 else, you wait in the area where, you know, Kendra sat, which
18 is, you know, two or three feet away from Ronald's door. It's
19 very small. But he was there. I don't know what you mean, in
20 his office or in the general area, I'm not sure.

21 Q. You have information through your investigation that you
22 developed that Mr. Wright had clients out of town?

23 A. Correct.

24 Q. Clients out of state?

25 A. Correct.

10:08

1 Q. That he went out of town?

2 A. Yes.

3 Q. He went out of state?

4 A. I believe he did, yes.

5 Q. Okay. And you have his cell phone, right?

6 A. We do.

7 Q. And you did a 500 -- there was a 597-page document
8 generated just from that cell phone alone.

9 A. Okay. I don't know off the top of my head the length of
10 the document. I know there was documents produced.

11 Q. Did you look over any of that information?

12 A. I looked over some of that information, but IRS explored
13 that phone, so they had that information.

14 Q. Okay. So did you rely on that information?

15 A. We looked through it. We discussed it. We put things
16 together from that. No one person in a joint investigation is
17 responsible for everything that goes on.

18 Q. Right.

19 A. Other than collaborating with each other.

20 Q. Right. You collaborate. So you talk with other
21 investigators?

22 A. Yes, I'm aware that that exists. I don't know the specific
23 number of pages.

24 Q. And I'm not trying to focus on the number of pages.

25 A. Okay.

10:09 1 Q. I'm trying to focus on the information. The number of
2 pages is not important. I'm talking about the information that
3 had GPS locations that Mr. Wright was out of town.
4 A. Sure.
5 Q. You can do a frequency analysis to find out how many --
6 Ms. Wright [sic] said -- Ms. Jackson, Kendra Jackson, said that
7 she never operated without checking with Mr. Wright, correct?
8 You heard the testimony.
9 A. Other than -- other than with Ms. Joretta Jackson --
10 Q. Right.
11 A. -- is the only time that she --
12 Q. Other than Ms. Joretta Jackson.
13 A. Is the only time she had told us about, yeah.
14 Q. And one of the things that you could use digital evidence
15 for and paper evidence for is to corroborate someone's
16 testimony, right?
17 A. Correct.
18 Q. Or to challenge it.
19 A. Sure.
20 Q. And did you do any frequency analysis on these phone
21 records?
22 A. I'm not sure specifically a frequency analysis was
23 conducted. I don't know.
24 Q. Okay. And, sorry, when I say "you," I mean anyone on the
25 team, not you in particular.

10:10 1 A. I don't recall. I don't know if that was conducted or not.

2 Q. Okay. You talked about sovereign citizens and kind of the
3 Moorish nations. You're familiar in your work with these
4 groups, right?

5 A. There are multiple groups involved with that ideology, yes.

6 Q. In fact, that's something that is pervasive throughout the
7 country.

8 A. It's a fairly large issue, yes.

9 Q. About when did you start to see it with regards to annoying
10 paperwork being filed?

11 A. Well, I know enough about that to give broad strokes about
12 the movement. It started in the '70s with tax protesters,
13 beginning with this. The debt redemption area didn't really
14 pop out until the '90s sometime, I believe. And this is all
15 just based on my research and reading.

16 Q. On the internet, right?

17 A. Some internet, some publications that were afforded us
18 through analysis and research, intelligence products, trainings
19 that I've been to, things like that.

20 Q. Okay. So this is not -- this is something that's a
21 legitimate movement that's been occurring in the United States.

22 A. I'll call it a movement, but I wouldn't necessarily call it
23 legitimate.

24 Q. Okay. You talked about -- you referenced some
25 investigations of health care fraud and other things like that.

10:12 1 Mr. Wright has never been arrested for any connection to health
2 care fraud.

3 A. No.

4 Q. Okay. Not been named in any indictments down in Charleston
5 area or Berkeley or somewhere that we don't know about, right?

6 A. Not that I'm aware of, no.

7 Q. Okay. All of these filings that he either did or assisted
8 with, none of those persons who did the filings have been
9 arrested, right?

10 A. Not currently, no.

11 Q. Okay. Did you say not currently?

12 A. Not right now, no.

13 Q. Okay. Is that something you're looking into?

14 A. It's a potential, always a potential for that.

15 Q. Okay. You were asked about --

16 MS. ZMROCZEK: Beg the Court's indulgence, Your Honor.

17 (Off-the-record discussion.)

18 BY MS. ZMROCZEK:

19 Q. After you -- the government, not you in particular -- but
20 you and your team, took all of this documentation, did you
21 receive -- you received correspondence from Mr. Wright asking
22 for some information back, right?

23 A. Not me specifically.

24 Q. Right, right. But you're aware of that.

25 A. I'm aware of some of that, yes.

10:13 1 Q. And nobody ever answered him or gave him an explanation as
2 to when he could get his paperwork back.

3 A. I don't believe so. I don't know.

4 MS. ZMROCZEK: Okay. No further questions, Your
5 Honor.

6 THE COURT: Redirect?

7 MR. PEARSON: Briefly, Your Honor.

8 REDIRECT EXAMINATION

9 BY MR. PEARSON:

10 Q. Agent Desmond, I know that you are an FBI agent, but there
11 were some questions about the receipt books and documents that
12 were taken from Money Solutions. Do you know the general
13 filing date for submitting your income taxes?

14 A. April, I believe.

15 Q. And when did this particular search warrant -- when was it
16 served?

17 A. November.

18 Q. And is November after April?

19 A. Yes.

20 Q. To your knowledge?

21 A. It is.

22 Q. Did Mr. Wright ever request the information from his
23 receipt books or income back, to your knowledge?

24 A. I cannot recall. He didn't deal directly with me for any
25 requests he made, so I don't know.

10:14 1 Q. And finally, you were asked a couple of questions about
2 this health care fraud investigation and that no one was --
3 that Mr. Wright wasn't charged in that and that it hadn't been
4 indicted. Could you please explain to the jury why that
5 case -- why that investigation hadn't gone forward?

6 A. Dr. Beck had been diagnosed with cancer at some point
7 during that and had eventually succumbed to that during the
8 investigation, so they weren't able to proceed with that.

9 Q. So the main individual passed away?

10 A. Correct.

11 MR. PEARSON: Thank you. Nothing further, Your Honor.

12 MS. ZMROCZEK: Very briefly, Your Honor.

13 RE CROSS-EXAMINATION

14 BY MS. ZMROCZEK:

15 Q. Agent Desmond, just two quick questions, hopefully.

16 He asked you about Dr. Beck, the dentist, passing away?

17 A. Yes.

18 Q. Is it your testimony that nobody was related -- nobody was
19 arrested related to Dr. Beck's scheme?

20 A. You know, I do not know. That was handled by agents in
21 another office.

22 Q. So you don't know?

23 A. I'm not familiar. I don't know. If anybody else was
24 arrested or indicted, I don't know.

25 Q. Okay. So you have no information that a Mr. Bank was

10:16 1 arrested?

2 A. It's possible. I know that we had a lot of documents with
3 Mr. Beck and that we kind of nominally kept up with that and
4 then heard he had passed away.

5 Q. Okay. And my question was about Mr. Bank.

6 A. Yeah, I'm not familiar enough with that case to know about
7 that.

8 Q. All right. And Count 4 of the indictment that Mr. Wright
9 is charged in deals with tax information from 2015, correct?

10 A. Okay.

11 Q. Is that correct?

12 A. It seems to be, yes.

13 Q. Okay. And you were asked about filing dates being in April
14 for taxes, right?

15 A. I mean, I'm aware that the deadline to file is in April of
16 whatever year.

17 Q. Okay. And then you're familiar that people either get
18 extensions and/or do things afterwards as well, correct?

19 A. I'm aware they can get extensions, yes.

20 Q. Thank you.

21 MR. PEARSON: Your Honor, there is one, I guess,
22 re-redirect based on that last question.

23 THE COURT: Okay.

24 FURTHER REDIRECT EXAMINATION

25 BY MR. PEARSON:

10:17 1 Q. Agent Desmond, I'm going to show you Count 4 of this again
2 and just ask you this question. In 2015, to your knowledge,
3 would you be filing taxes for the tax year 2015 or would that
4 be for income from 2014?

5 A. 2014.

6 Q. The year prior.

7 A. Correct.

8 MR. PEARSON: Thank you.

9 THE COURT: All right. Mr. Brooker?

10 MR. BROOKER: I don't believe I have any questions of
11 this witness, Your Honor.

12 THE COURT: Okay. Very good.

13 All right. I believe, Agent, they are finished with
14 you. You may step down.

15 MR. PEARSON: Your Honor, that is actually the last
16 witness that the government intends to call. The government
17 would rest its case at this point.

18 THE COURT: All right. Thank you.

19 All right. Ladies and gentlemen, we've reached the
20 point of the trial that I think I described at the beginning.
21 The government puts their case up first, they've concluded
22 their part of that, so -- and especially given the time of the
23 morning, we will take a break while I take up a few matters of
24 law with the lawyers, so just be excused to your jury room and
25 we will call you shortly.

10:18

1 (Jury not present.)

2 THE COURT: All right. Do we have motions?

3 MS. ZMROCZEK: Yes, Your Honor. I'll let Mr. Brooker
4 go first. I know he's got his typed up, and then I'll go next.

5 THE COURT: All right. Mr. Brooker.

6 MR. BROOKER: Thank you, Your Honor. Your Honor, we
7 moved for -- we make a motion for judgment of acquittal on
8 Counts 2 and 3 of the indictment, and of course is, and I'll
9 explain to you the reason why.

10 Obviously, on a motion for a judgment of acquittal,
11 one of the things that I believe that the Court is concerned
12 with is, is that whether or not there is substantial evidence
13 in which -- whether or not there is substantial evidence that a
14 reasonable jury of fact could accept as adequate and sufficient
15 to support a conclusion of a defendant's guilt beyond a
16 reasonable doubt.

17 And obviously, whenever the Court is considering this
18 motion, that this motion is considered in a light most
19 favorable to the defendant -- excuse me, to the government.

20 Now, and of course is, is that when I think that
21 you're looking at a motion for judgment of acquittal, there
22 must be substantial evidence in connection with each and every
23 element of the offense, and I think what it's intended to do,
24 Your Honor, is, is to make sure that the jury is not making a
25 decision that there's not sufficient enough evidence --

10:20 1 THE COURT: I understand -- I understand the standard
2 and I understand the purpose of it, so just tell me why you
3 think I should grant your motion.

4 MR. BROOKER: I'll go straight into the motion, Your
5 Honor. The argument, Your Honor. Is that obviously is, is
6 that, Your Honor, there are four elements to the offense of
7 26-7212(a), and specifically, the omnibus clause section that
8 Ms. Jackson is entitled to, and of course is, in order for the
9 government to have this case submitted to the jury, the
10 government first must prove or present evidence in which a jury
11 could find -- reasonably find beyond a reasonable doubt that
12 Ms. Jackson endeavored to obstruct or impede the due
13 administration of the Internal Revenue Code.

14 And of course is, is that -- and then of course
15 secondly, they must demonstrate that her attempt to do so was
16 done corruptly or by force or by threat of force, including
17 threatened communication.

18 And of course is, is that thirdly, they must
19 demonstrate that the alleged conduct that was done to impede
20 the investigation, that there is a nexus -- that there was a
21 nexus between the defendant's alleged unlawful conduct and the
22 particular administrative proceedings, such as an investigation
23 or an audit.

24 And then of course is, is that fourthly, they have to
25 prove that at the time of the defendant's conduct, that the

10:22 1 defendant knew that there was a pending investigation, or had
2 reason to believe there was one pending. Okay.

3 With respect to element 1, Your Honor, we think that
4 they have not presented sufficient enough evidence in which a
5 jury could find beyond a reasonable doubt that the defendant
6 engaged in corrupt -- corruptly engaged in -- engaged in
7 conduct intending to impede the due administration of the
8 Internal Revenue laws and did it corruptly.

9 Now, according to statute, corruptly is a specific
10 intent crime, so that they have to present evidence in which a
11 jury could find that -- not that Ms. Jackson engaged in conduct
12 and that conduct just happened to generally -- engaged --
13 generally impeded or interfered with the due administration of
14 the Internal Revenue Service, is that *Marinello* says is that it
15 is a specific intent conduct, which means that they have to
16 demonstrate at the time in which she submitted those checks
17 that she knew that her conduct, that the conduct that she was
18 engaging in, that that conduct was designed specifically to
19 interfere or impede with the due administration of the Internal
20 Revenue Service. So they can't just simply say that it did
21 that; they have to show that at the time in which she engaged
22 in the conduct, that that was her specific intent.

23 And of course is, is that there has been absolutely no
24 evidence of that whatsoever. I mean -- and when I said no
25 evidence of that is, is that I'm not exaggerating. I think

10:24 1 evidence of that could have come from potentially two
2 witnesses. The first witness would have been Misty Davis, and
3 of course is, is that Agent Davis testified to the fact is, is
4 that her first contact with Ms. -- with Ms. Jackson was in
5 actually two thousand -- I think June of 2013, and of course
6 the impetus of that contact was, is that they had received
7 communication that there was large amounts of money that was
8 flowing through her account related to this African prince
9 scheme that is unrelated to this particular case.

10 And she testified at that time -- and I wrote it down
11 specifically, because I asked her this question specifically
12 for this moment -- at that time whether or not she informed
13 Ms. Jackson as to whether or not she was under investigation
14 for anything, and she said no, she did not inform Ms. Jackson
15 that she was under investigation for anything.

16 And of course then I asked her whether or not she knew
17 whether or not anyone in her office informed Ms. Jackson, and
18 she said no. Okay?

19 So the question then becomes is, and I think what
20 *Marinello* says, is that she has to know that the conduct -- at
21 the time in which she engaged in the conduct, that there is an
22 investigation going on, and specifically, they have to show
23 that her conduct was designed to impede that investigation.

24 And of course is, is that they also have to show that
25 there was a nexus -- when you look at the nexus element, they

10:26 1 have to show that there was a nexus between the alleged
2 obstructive conduct or impeding conduct, and then of course is,
3 is that the investigation, and they have to show that, you
4 know, in time, place, and logic.

5 At this particular period of time is, is that their
6 meeting, I think, occurred was in 2013. I also asked Misty
7 Davis that after she met Ms. Jackson in 2013, whether or not
8 she ever met Ms. Jackson before or had contact with Ms. Jackson
9 before or thereafter, and she said no. The next time Misty
10 Davis or the Internal Revenue Service -- and I'm talking about
11 the criminal investigation division -- had contact with
12 Ms. Davis [sic] was in June of 2015 and that was --

13 THE COURT: What about that file that we had to --

14 MR. BROOKER: There --

15 THE COURT: Wait. Let me finish. What about the file
16 that you -- because you suggested that to Ms. Davis, that there
17 had not been contact, the government had to go and put in those
18 documents to show that there was extensive contact all during
19 2014 specifically.

20 MR. BROOKER: And I'm glad you got to that, Your
21 Honor, because that's what I was getting around to, and I'm not
22 lost on that at all.

23 THE COURT: Okay.

24 MR. BROOKER: Okay? Is, is that -- and the reason why
25 I'm dealing with this is, is that because underneath *Marinello*

10:27 1 is that the contact has to -- the contact can't be just general
2 day-to-day operations contact.

3 THE COURT: Got it.

4 MR. BROOKER: It has to be a contact that's related
5 to --

6 THE COURT: I heard you make these arguments before.

7 MR. BROOKER: Absolutely. And I'm going to get to --
8 I'm going to get to that general contact stuff, all of that
9 other stuff, I'm going to get to that, that large -- I think it
10 was Government's 30 that they put in.

11 But of course with respect to Misty Davis and the
12 criminal investigation, I think we can clearly say is that she
13 had absolutely no knowledge that she was under investigation,
14 and of course, the last contact that she had with Misty Davis
15 at the time in which she presented those checks was, I think,
16 roughly two years. So two years has elapsed since then.

17 So she wasn't informed that she was under
18 investigation by Misty Davis and of course is, it also is that
19 she had no reasonable expectation that she would have because
20 two years had elapsed since she had saw Misty Davis or had a
21 contact with this criminal investigation.

22 Now, let me get to what you just mentioned, Your
23 Honor, and of course is, is that that communication, that
24 general generic communication that went back and forth between
25 her and the Internal Revenue Service about her taxes, I think

10:28 1 it started from 2006 and went all the way up to 2018, and of
2 course is that this was in reference to satisfying her debt.

3 And of course is, is that if you look through that
4 communication, and look through that communication, and I have,
5 there is nothing in there that says you are under
6 investigation, that you are being audited, that you are under a
7 specific investigation, so that they can allege that at the
8 time in which she submitted those checks, that she knew that
9 she was under investigation and submitted those checks for the
10 purposes of thwarting that investigation.

11 I think even is, is that we put in -- we put in
12 Defense, I think it was 1 and -- Defense Joretta Jackson's 1
13 and 2, and those were those two letters from the Internal
14 Revenue Service that she received in May of -- I think one was
15 in May of 2014, the other one was in June of 2014, and of
16 course is, in which the Internal Revenue Service, I think there
17 was a -- she had a hearing in reference to levy, and of course
18 is, is that the officer, the hearing officer declined to levy
19 against her account.

20 And of course is, it sent her a notice basically
21 saying is, is that the request for a levy by the Internal
22 Revenue Service had been denied or declined and sent her a
23 letter out that -- saying is that, hey, you're in noncollect
24 status. It doesn't mean that you don't owe this debt. You
25 still owe this debt. It still will accumulate -- accumulate on

10:30 1 interest and fees, but you're in noncollect status.

2 And the question then becomes is, at that particular
3 period of time, that demonstrates that she had no knowledge
4 that the IRS or either anyone else was investigating her and
5 had no reasonable expectation that no one was, because she
6 received that letter saying that she was in noncollect status,
7 the case was closed in June and July of 2014, and of course is,
8 is that Misty Davis testified the fact is, is that when she met
9 her in 2013, when she met her, she told her -- she didn't tell
10 her that she was under the investigation for anything and no
11 one from her team told her that.

12 And that is an element that they have to prove, that
13 she knew she was under investigation and she sought to thwart
14 that investigation by submitting those two checks. And it
15 can't be just any investigation. She knew of a specific
16 investigation that was pending against her and she sought to
17 thwart it.

18 And of course is, is that intent is also other --
19 intent is also lacking, in that no reasonable jury could find
20 that there was an intent specifically for her to -- for her to
21 impede or obstruct the due administration of the Internal
22 Revenue Code, because also is, is that the only other evidence
23 that that information could have come through would have been
24 through Kendra Jackson.

25 And Kendra Jackson testified that when -- that when

10:32 1 Ms. -- when Ms. Jackson, Joretta Jackson, came to her, that
2 Joretta Jackson asked her whether or not this was a legitimate
3 business. Whether or not this was a legitimate business. And
4 she told her it was. It was legitimate. And of course is, is
5 that Kendra also testified to, is that Ms. Jackson did
6 nothing -- didn't know anything. That all of those techniques
7 and procedures that was performed, the drafting of the check --
8 the drafting of the checks --

9 THE COURT: How about providing a closed account? She
10 provided a closed account number.

11 MR. BROOKER: Your Honor, she provided --

12 THE COURT: She didn't need --

13 MR. BROOKER: I'm sorry, I didn't mean to talk over
14 Your Honor.

15 THE COURT: -- Ms. Jackson to tell her it was not
16 okay.

17 MR. BROOKER: Your Honor, and I understand that. I'm
18 glad you raised that issue. The question I'm trying to make
19 with respect to specific intent is, is that the statute says
20 that she must have had a specific intent, you know, to impede
21 the due administration of the Internal Revenue Code, which
22 means that she must have known, you know, that this conduct,
23 you know, was not lawful, and of course is, is that what Ms. --
24 what Kendra Jackson testified to is, is that she had absolutely
25 no knowledge of these techniques that they were performing,

10:33 1 that she told her everything what to do, she researched the
2 Internal Revenue -- or the UCC, she drafted those checks, she
3 even told her how to fill those checks out.

4 THE COURT: I heard her testimony. I heard her
5 testimony.

6 MR. BROOKER: She told her everything. If that's the
7 case, if she did -- if she did everything that was told her by
8 this business that she thought was legitimate, they said in
9 order -- in order -- this technique worked, they told her this
10 technique works, and of course is, in order for this technique
11 to work, you need to give us this, you need to give us a
12 canceled check, you know, so we can generate a check, and of
13 course is, is they generated the canceled check, they told her
14 how to fill out, they told her everything what to do, and of
15 course is, is that if there's any error that she made, that
16 error was reliance. She relied on the advice, relied on the
17 work that was performed by this agency.

18 And so there was not sufficient evidence in which a
19 jury could say that there is substantial evidence for us to
20 believe, you know, that she had a specific intent, you know, to
21 engage in conduct that she knew would have impeded or
22 obstructed the due administration of the Internal Revenue
23 Service.

24 In order for the jury to do that, they would have to
25 simply speculate, because Kendra Jackson says, I did

10:34 1 everything. I told her everything what to do. I even gave her
2 an instruction sheet and told her how to fill it out. None of
3 that. What evidence did they present it that says that, hey,
4 she specifically knew at the time in which she was engaging in
5 this conduct that it was illegal? That's the evidence that
6 they have to present. And they have not presented any of that.

7 And of course before you shut me down, Your Honor, is
8 that I want to also make the motion based upon one of the
9 other -- one of the other elements.

10 THE COURT: All right.

11 MR. BROOKER: I'm sorry, go ahead, Your Honor.

12 THE COURT: Okay. I'm ready.

13 MR. BROOKER: And of course is, Your Honor -- I've
14 already touched upon this, and of course is, that that would
15 have been -- I think that there's insufficient evidence with
16 respect to the third element that they have to prove pursuant
17 to *Marinello*. *Marinello*, I think, generated two additional
18 requirements. And that third one is that the government must
19 prove beyond a reasonable doubt that there was a nexus between
20 the defendant Joretta Jackson's alleged illegal conduct and the
21 particular administrative proceeding as an investigation or
22 audit. And of course, that nexus requires a relationship in
23 time, causation, or logic. And of course is, is that if you
24 look at the timing of this, if you look at the timing in
25 which -- whether or not there's a nexus between the -- you

10:36 1 know, between the alleged conduct, she submitted those checks
2 in February of 2015, in February of 2015, both checks, and of
3 course is, is that this investigative interview with Agent
4 Jackson [sic] occurred almost two years earlier, not quite, but
5 almost two years early in 2013, and of course is, is that also
6 is, is that if you're looking at the -- her normal day-to-day
7 contact with the Internal Revenue Service, you know, which that
8 is not, in my opinion, you know, a specific proceeding in which
9 that can be used, you know, to say that she sought to obstruct,
10 because I think the -- *Marinello* goes on to say, you know, that
11 the proceeding -- and I'll read it specifically.

12 It says, while we -- it says -- and I'm about to sit
13 down, Your Honor. I know they have a motion too. I apologize.
14 It says: The particular administrative proceeding, we do not
15 mean every act carried out by the Internal Revenue Service
16 employees in the course of their continuous, ubiquitous, and
17 universally known administration of the tax code.

18 And of course is, is that's that day-to-day contact,
19 you know, in Exhibit 30 that she had with them, where -- and of
20 course is, is that I think there's tons of that where she
21 constantly called them, they constantly called her. She was
22 back and forth on the phone, you know, with customer service
23 representatives with the Internal Revenue Service, okay?

24 THE COURT: Do you have any comment on the information
25 that's in that exhibit where she is promising to produce

10:37 1 certain things and then does not do that?

2 MR. BROOKER: And let me comment to that, Your Honor.
3 And that is a part of the day-to-day administration --

4 THE COURT: Okay, I got it. That's fine. I
5 understand. I remember those comments. I just want to know if
6 you -- so in your view, those are just part of the normal
7 day-to-day contact with the IRS.

8 MR. BROOKER: Yeah.

9 THE COURT: Okay.

10 MR. BROOKER: She was dealing with day-to-day
11 employees that were charging and collecting this stuff and
12 making sure -- because there were tons of communications back
13 and forth between her and them.

14 THE COURT: I gotcha.

15 MR. BROOKER: So not a specific administrative
16 proceeding. It goes on to say, While we need not hear --
17 exhaustively itemize the types of administrative conduct that
18 falls within the scope, you know, of the statute, that conduct
19 does not include routine day-to-day work carried out in the
20 ordinary course of the IRS, such as the review of tax returns.

21 So the Internal Revenue Service, all this contact with
22 her, and of course they're saying get this form in, get that
23 form in, file this, file that, that is day-to-day routine
24 conduct. That is not specific administrative proceedings like
25 an investigation and an audit, which does not count. But the

10:39 1 jury is going to have to speculate on this.

2 THE COURT: Okay. I think I understand your argument.

3 MR. BROOKER: Thank you, Your Honor.

4 THE COURT: All right. Thank you.

5 All right. Mr. Pearson.

6 MR. PEARSON: Yes, Your Honor. Concisely, I would
7 argue this, and clearly, if Your Honor wants me to address any
8 specific point, the government will, but under Rule 29, which I
9 don't believe he -- I don't believe the defense actually said,
10 but I believe this is a Rule 29 motion, the proper standard is
11 not substantial evidence, but in fact, viewing the evidence in
12 the light most favorable to the government, any rational trier
13 of fact could have found the defendant guilty beyond a
14 reasonable doubt.

15 Your Honor, although the government disputes many
16 things that were said, we will stick with this one -- just this
17 one argument.

18 Although the defense likes to quote the *Marinello*
19 decision, they conveniently leave out the part of the decision
20 that says whether or not the investigation was reasonably
21 foreseeable. Now, Your Honor, I would just direct your
22 attention to the statements from Agent Davis, I think that were
23 asked by the defense. The interview was ended on those
24 questions and the defendant Joretta Jackson said, I think I
25 need to get a lawyer. A rational trier of fact could take her

10:40 1 decision to get a lawyer in reference to a criminal
2 investigation as that she reasonably foresaw that there was, in
3 fact, an investigation.

4 Your Honor, the government would be happy to address
5 the rest of the motions, but we do believe that, on itself,
6 makes the defense motion Rule 29 fail, and we would end the
7 argument there, unless Your Honor would like us to go further.

8 THE COURT: I would like to hear a little bit more
9 about the specific intent to impede the investigation.

10 MR. PEARSON: Yes, Your Honor.

11 THE COURT: Because I think that the defense is trying
12 to sort of separate the investigation into the African prince
13 that started when large sums of money were moving through her
14 accounts and this ongoing issue with her tax liability.

15 MR. PEARSON: Yes, Your Honor. It appears that the
16 defense would like to argue that there has to be just one
17 investigation with any case, and that is just simply not true.

18 There are many things going on with Ms. Jackson during
19 this period of time, including this bevy of contacts where
20 Ms. Jackson is constantly attempting to reduce, attempt, and
21 change her tax liability. She admitted -- she submitted claims
22 that her identity was stolen. She submitted claims that she
23 was a victim of fraud from 2006 and that she had signed various
24 powers of attorneys with other CPAs and that those individuals
25 had done things wrong and that led to her tax liability being

10:42 1 something different. She continues to go on and extend the
2 nature of this investigation.

3 And I asked Mr. Bollus very specifically: Did these
4 things extend their investigation into what she owed? And they
5 did, because she would fail to present documents, she would
6 fail to present proof for various certain things, and finally,
7 the government would point out that her attempt to discharge
8 this debt using these fraudulent checks is the culmination of
9 her ongoing attempts to try to impede the IRS's ability to
10 properly calculate what she owed. And that is due to her
11 actions.

12 That is the nexus that is required under the elements
13 of this particular offense, and as the government has presented
14 evidence, which is the standard, this Rule 29 motion should
15 fail.

16 THE COURT: All right. Anything in response?

17 MR. BROOKER: If I can take, Your Honor, and it will
18 be very brief, and of course I'll touch upon at least -- let me
19 get to the microphone for the benefit of the court reporter. I
20 apologize.

21 Just very briefly on a couple of things that the
22 government says. The government basically says is, is that
23 with respect to -- and of course we did mention the fact is, is
24 that whether or not she knew she was in an investigation or had
25 reason to know whether or not she was in an investigation. I

10:43 1 did mention that, didn't conveniently left it out, you know,
2 and so that is incorrect.

3 The second thing is, is that back in 2013, Misty Davis
4 testified that she did not inform her that she was under any
5 particular investigation. She asks her, well, okay, can I get
6 a lawyer and of course is, can we talk with the lawyer? And of
7 course is, that after they talk with the lawyer, then of course
8 still no evidence that she was reasonably under investigation,
9 because you also have to look at the nexus relationship.

10 After she had the conversation with Misty Davis, is
11 that the year and a half, nearly two years passed, absolutely
12 no contact with the criminal investigation unit. Is that how
13 can she reasonably believe in 2015, when she had no contact
14 with the criminal investigation unit, Misty Davis, for a year
15 and a half, had no contact with her whatsoever, that somehow
16 that was an ongoing generated investigation?

17 And that's why I think *Marinello* says, is that there
18 has to be some sort of relationship in time, because it would
19 not be logical for her to conclude at that particular point in
20 time that she was under investigation and had -- and haven't
21 had contact for over a year and a half.

22 Now, what he's talking about, Exhibit 30, which all of
23 that bunch of stuff, that day-to-day communication, *Marinello*
24 says that you have to point to a specific ongoing investigation
25 that she was aware of. Not that she was having these

10:44 1 conversations with the Internal Revenue Service about, you
2 know, hey, you submit this document, you submit that document,
3 we need this from you, we need that from you, and the IRS kept
4 asking her for this document and she didn't provide it. Even
5 if that was the case, even if she never presented any of these
6 documents, that is not a specific ongoing investigation under
7 *Marinello*.

8 THE COURT: But the problem with your argument is that
9 the jury might think that the fact that she keeps throwing out
10 these things, my identity has been stolen, it's the
11 accountant's fault, it's the tax preparer's fault, the jury
12 could conclude that that was her intent, to impede this. They
13 may not. You may have the stronger argument on the facts, but
14 the standard in this particular motion is, as Mr. Pearson said,
15 evidence from viewing it in the light most favorably to the
16 government, which doesn't happen a lot, but on a motion for
17 acquittal, that's what I have to do.

18 So I think that these arguments that you're making,
19 I'm not discounting them, I'm telling you that the place to
20 make those arguments will be to the jury.

21 MR. BROOKER: And let me say 15 seconds and I'll sit
22 down, Your Honor. The problem with that is, and this is one of
23 the reasons why -- because the jury doesn't get confused like
24 this, this is one of the reasons why I think the Rules of Civil
25 Procedure --

10:46 1 THE COURT: I'm going to give them a very good charge
2 on this.

3 MR. BROOKER: -- says that the judge should review
4 this, and the reason why is, is that it is up to the judge to
5 make a determination as to whether or not that conduct is
6 day-to-day routine conduct or whether or not that conduct is a
7 specific investigation.

8 THE COURT: You say that's a decision that I have to
9 make before it goes to the jury? I don't see that. I think
10 you're -- I don't think you're right about that. I don't think
11 this is a bifurcated process where the Court makes some initial
12 ruling about the nexus with a known or should have known
13 investigation, which is what you're suggesting to me. And I'm
14 telling you, unless you can find some case law to tell me that,
15 I don't think that's the law.

16 MR. BROOKER: No, what I'm saying is, is that on this
17 motion, under this 29, it allows the judge to make a
18 determination as to whether or not they identified a specific
19 administrative proceeding, like an audit or an investigation.
20 You know, all of that --

21 THE COURT: And they've identified that. They've
22 identified an investigation, an investigation that began and
23 continued. You can argue the lack of -- that that really
24 wasn't an investigation or an investigation that she knew or
25 should have known about, you can argue that the submission of

10:47 1 these made-up instruments was -- had nothing to do with all of
2 that, and you can argue that to the jury, but I'm going to deny
3 your motion for acquittal on both of those counts and let this
4 go to the jury because I think under the proper standard -- not
5 discounting your arguments, I think you're making the right
6 arguments based on the evidence that's in the record, but I'm
7 saying I don't think at this juncture I'm allowed, under the
8 standard that I have to follow, to grant your motion. So I'm
9 going to deny it.

10 MR. BROOKER: Thank you, Your Honor.

11 MS. ZMROCZEK: Your Honor, my argument will be --
12 well, the first thing I want to do, Your Honor, is to reiterate
13 or renew my motion to sever. That explanation, in and of
14 itself, like I said at the beginning when -- at the beginning
15 of the case when the government dismissed Counts 2 and 3
16 against my client, then we have this testimony that's presented
17 against Ms. Jackson -- sorry, I'm getting my clients confused,
18 yeah, against Ms. Joretta Jackson, which is separate and
19 completely different from the investigation and information --
20 or not investigation, but the information presented and the
21 charges presented against Mr. Wright, Count 1 specifically
22 dealing with the conspiracy.

23 And I know that I made these arguments earlier, so I'm
24 not going to continue to reiterate them, but I just really
25 wanted to make sure, Your Honor, that I renewed that one, as

10:48 1 well as my hearsay objections, what -- certainly, I expressed
2 my hearsay with the 32 boxes that are going in, my hearsay
3 concerns with the 32 boxes that are going in, likely making
4 this one of the largest records on appeal ever.

5 But I think that my concern is all of the information
6 that isn't relevant in there, we don't know, when the jury
7 receives this information, in anticipation of my denial of the
8 motions to dismiss, that -- what they are going to rely on or
9 what they are going to view, and if that evidence in particular
10 was relevant or not relevant.

11 And Mr. Pearson may say, well, Your Honor, then she
12 can pick out the ones that aren't relevant, but it's not our
13 duty, it's the government's duty to show why that evidence --

14 THE COURT: I know, but if they only put in the pieces
15 that they want, you'd be arguing that they didn't put in all of
16 the file, so there's just no way to make everybody pleased with
17 the ruling on that, and I understand that.

18 I do think, though, that as far as your motion to
19 sever, I'm going to deny that for all of the reasons that I did
20 earlier.

21 And I think the way that the trial has proceeded
22 demonstrates that this has been a very orderly presentation of
23 the evidence and that, you know, thanks to everyone's
24 participation, I think the evidence against each defendant has
25 been properly focused, and I don't think there's going to be

10:50 1 any of the confusion that legitimately could concern you at the
2 beginning of the trial, because you never know what's going to
3 happen.

4 MS. ZMROCZEK: Right.

5 THE COURT: But I think the way the trial has
6 unfolded, I think the motion to deny -- I mean the decision to
7 deny the motion to sever was the correct one at that time and
8 it remains that way.

9 MS. ZMROCZEK: Certainly, and I know that we'll
10 address that in jury charges as well.

11 THE COURT: All right.

12 MS. ZMROCZEK: And then, Your Honor, again, we would
13 just, under Rule 29, move to dismiss. I do understand the
14 evidence that's been presented and I do understand kind of the
15 nature, so I understand that there is evidence likely to go
16 forward, but just under my duty, I would do that.

17 I would also ask at this time, Your Honor, after you
18 make your ruling, that you engage in the colloquy regarding
19 testimony of my client.

20 THE COURT: I'm sorry, I'm thinking about my motions.
21 What? You trailed off there a little bit.

22 MS. ZMROCZEK: Sorry. When we're finished with
23 that -- this is my brain, Your Honor, but just to make sure
24 because I know it's now our opportunity to present a case.

25 THE COURT: I will have that colloquy with him

10:51 1 shortly.

2 MS. ZMROCZEK: Thank you.

3 THE COURT: All right. As I say, I'm going to deny
4 your renewed motion to sever, I'm going to deny your renewed
5 motion based on hearsay for what I consider to be the business
6 records of Money Solutions, and for all the other reasons that
7 I've stated during the trial, I'm also going to deny your
8 Rule 29 motion. I think there's not only sufficient evidence,
9 but overwhelming evidence for a jury to conclude your client's
10 guilt beyond a reasonable doubt. So all those motions are
11 denied.

12 MS. ZMROCZEK: Thank you.

13 THE COURT: All right. Anything further from the
14 lawyers?

15 MR. PEARSON: Nothing from the government, Your Honor.

16 MS. ZMROCZEK: Not on that issue, no.

17 THE COURT: All right. Then Mr. Wright, sir, if you'd
18 stand, please.

19 DEFENDANT WRIGHT: Yes, ma'am.

20 THE COURT: You will recall, I told you -- or Judge
21 Currie told you, probably, and then I told you at the beginning
22 of this trial, explained to the jury that the burden of proving
23 beyond a reasonable doubt all of the elements of the counts
24 with which you're charged is the burden of the government and
25 you have no burden to put up evidence or to testify or put up

10:52 1 exhibits, anything.

2 But -- and that during the charge and during the
3 lawyer's arguments to the jury, they're not going to be able to
4 reference the fact that you did not testify. They're not going
5 to be able to take that into consideration at all. And they'll
6 also be instructed that when they go back to deliberate on
7 their verdict, that is also not to be a part of their calculus
8 and their decision.

9 On the other hand, you have the right --

10 MR. PEARSON: Your Honor, I'm sorry to interrupt, but
11 we didn't ask if Ms. Jackson needed the same thing, and I
12 wouldn't want Your Honor to have to do all this twice.

13 THE COURT: Oh, that's probably -- you know, let me
14 start over then, and I'll just do this all at one time. Thank
15 you. That will save me some time.

16 All right. Mr. Wright and Ms. Jackson. Just like you
17 heard me say, the burden is always on the government to prove
18 beyond a reasonable doubt each and every element of the counts
19 which you are specifically charged.

20 They are not going to be able to draw any inferences
21 or any suggestions of guilt from the fact that you don't
22 testify, because that's not your responsibility to put up any
23 evidence at all. They will be instructed about that, the
24 lawyers will not be allowed to point to that as a basis for
25 anything, and when they retire to their jury room, they will

10:53 1 not be allowed to take that into account at all. They're
2 prohibited from doing that.

3 On the other hand, you have a constitutional right to
4 testify if you choose to do so. It's purely up to you.
5 Obviously, I encourage you to make use of the wise counsel of
6 your lawyers, but it is purely your decision about whether or
7 not you want to testify.

8 And when I call upon you all after this next break,
9 that decision will have to be made and you will either have to
10 proceed with testifying or not. It doesn't mean that you have
11 to go first in your case, but I'll need to have a decision
12 about whether or not you're going to testify. Is that
13 understood?

14 DEFENDANT WRIGHT: Yes, ma'am.

15 THE COURT: Any questions about that?

16 DEFENDANT WRIGHT: No, ma'am.

17 THE COURT: All right. Very good.

18 COURTROOM DEPUTY: Ms. Jackson didn't answer.

19 THE COURT: She has a question?

20 COURTROOM DEPUTY: She didn't answer.

21 THE COURT: You didn't answer. Oh, we need you to
22 verbalize your response. I know you nodded your head yes, but
23 I just need you to say yes so the court reporter can get that
24 on the record.

25 DEFENDANT JACKSON: Yes.

10:55 1 THE COURT: Okay. All right. Well, it's just a
2 minute before 11:00. Let's take a short break, be back here at
3 ten minutes after 12:00, all right?

4 MR. PEARSON: 11:00.

5 THE COURT: 11:00, yes. Thank you.

6 (Recess, 10:55 a.m. to 11:16 a.m.)

7 THE COURT: All right. Please be seated. All right.
8 Anything before we bring the jury in?

9 MR. PEARSON: Nothing from the government, Your Honor.

10 THE COURT: Okay. Are you ready to put up your case?

11 MS. ZMROCZEK: I am, Your Honor, yes.

12 THE COURT: Okay. All right. Bring them in.

13 (Jury Present.)

14 THE COURT: All right. Ms. Zmroczek.

15 MS. ZMROCZEK: Thank you, Your Honor. We call Ronald
16 Wright.

17 COURTROOM DEPUTY: Please raise your right hand.
18 Please state your name for the record.

19 RONALD ALLEN WRIGHT, DEFENDANT WRIGHT WITNESS, SWORN

20 COURTROOM DEPUTY: Thank you. You can have a seat in
21 the witness box.

22 THE WITNESS: Thank you.

23 DIRECT EXAMINATION

24 BY MS. ZMROCZEK:

25 Q. Good morning, Mr. Wright.

11:18 1 A. Good morning.

2 Q. Will you please introduce yourself to the jury?

3 A. My name is Ronald Allen Wright.

4 Q. How old are you, Mr. Wright?

5 A. 53 years old.

6 Q. Tell the jury a little bit about yourself. Tell them where
7 you grew up, where you're from, how far you went in school.

8 A. I was born and raised in Georgetown, South Carolina, in
9 1965. My parents, Ms. Leona Wright and Ronald Coleman, both
10 met when they was in the blind school in Spartanburg, because
11 both my parents are blind.

12 My father is the first black totally blind student to
13 graduate from Furman University with double cum laude.

14 My mother, she's the one that raised me, because back in
15 those days they was very strict when you're going to school and
16 you get pregnant, so she was unable to continue. She had to do
17 home lessons.

18 She was the one that taught me my ABCs, everything, so when
19 I finally went to Catholic school, because that's where I
20 started going to school at, I stayed in kindergarten for an
21 hour, because when they asked me to spell my name, I spelled my
22 name, birth, alphabets, did the alphabet, and started saying it
23 backwards. So they took me straight on over to first grade
24 class.

25 Q. All right. And Ronald, I'm going to interrupt you for just

11:20 1 a moment, because I don't want to go through each grade with
2 you, okay? Let me ask you this. Did you -- did you graduate
3 high school?

4 A. Yes. I graduated from high school at the age of -- right
5 coming up on the age of 21, because I had some eye issues,
6 where I missed three years out of school.

7 Q. Let's talk about -- I want to talk about these eye issues.
8 When you say "eye issues," kind of explain what that means.

9 A. Around about the age of ten, I had retina detachment.
10 Actually, when I was speaking the other day, I got them mixed
11 up, because it was the left eye that I started having a problem
12 with. And it was retina detachment. And, you know, they were
13 saying it's because on my father side, most of the people on
14 that side have eye problem and my mom is the only one on my mom
15 side.

16 So I had the retina detachment on the left eye and then
17 after that first retina detachment, a second one occurred.
18 Then after that, I went back to school, started back to school,
19 and before that year -- that year was out, I developed what is
20 called cataract on my right eye. And within 24 hours, like the
21 vision -- because I still can hardly see out the left eye due
22 to the two surgeries I had, and all of a sudden within about 24
23 hours, like the vision just mysteriously just disappeared from
24 this eye and boom, I can see out this one again.

25 Q. Okay. Let me stop you there. So can you -- what is your

11:22 1 vision now? Can you drive?

2 A. Technically I -- I'm able to drive again now because I
3 started treating myself, 'cause I'm a Reiki master now.

4 Q. Okay. And I want to talk about -- let me ask you this.
5 Can you read emails?

6 A. Back then, I couldn't hardly read them that well. Now I
7 can read a little bit better.

8 Q. Okay. But you can read and write, and you still have some
9 eye problems, but they're getting better, right?

10 A. Yes, they're getting better.

11 Q. Okay. Now, let me ask you a little bit about, after you
12 graduated high school, what kind of work did you do?

13 A. I graduated from high school, I became an electrician due
14 to the course I took while I was in high school, electricity
15 one, electricity two, and worked part-time with my instructor,
16 who was also electrician. So when I got out of school, I was
17 able to get my journeyman license 30 days after getting out of
18 high school, whereas you're supposed to work two years before
19 you can qualify to even take the test, but my instructor did a
20 letter and I was able to pass the test.

21 Q. Okay. And Ron, I want to ask you, after you did an
22 electrician, did you do any other kind of work?

23 A. After electrician, basically I was -- when I sold the
24 business, got rid of the business in 2002, I still did it on a
25 smaller scale. In other words, when I got rid of the business,

11:23 1 I had nine trucks, 16 guys, and I just basically got tired of
2 just the hiring and firing and all the hustle and bustle, so I
3 downsized basically down to one truck and -- but I got involved
4 in ministry and I was teaching Bible school. One of my -- one
5 of my student was Chris Rock mother.

6 And then I got into feeding the homeless down -- right here
7 in Columbia at the Finlay Park every Sunday morning, just doing
8 outreach stuff, working with people that was on drugs and
9 alcohol. That's what I did.

10 And I still continued to do the actual electricity, because
11 I was doing work for like the counties, where they had these
12 block grants and they go in and do work on people houses that
13 was handicapped or whatever. I still continued to do that up
14 until 2009.

15 I also had a photography business where I did pictures,
16 photography, at clubs, parties, concerts. I even had a studio
17 on Garner Ferry Road. So I was just in and out, a lot of
18 stuff, just multi-talent. Everything was just working fine.

19 Q. Okay. And then I want to talk about Money Solutions,
20 because that's what we're here for.

21 A. Okay.

22 Q. Tell the jury a little bit about how Money Solutions got
23 started.

24 A. Money Solution came from the fact when I had the cell phone
25 store. That's how Money Solution got started. It got started

11:25 1 by the fact that I had customers who would break their phone,
2 lose their phone, but had to wait to next payday to buy another
3 phone or whatever, so I got to a point where I said, man, I got
4 to find a way that I can help them and then they'll be able to
5 get the phone and stuff, don't have to wait till the next pay
6 period.

7 So when I was passing out fliers in the Walmart parking
8 lot, I ran across someone who was a manager of a pay -- what's
9 it called, payday, payday loan, but I was skeptical because I
10 heard so much about the payday loan thing, and so -- but she
11 told me, said, well, we give a hundred dollars for every one
12 you refer.

13 MR. PEARSON: Objection, hearsay.

14 BY MS. ZMROCZEK:

15 Q. And Ron, you can't say what other people told you.

16 A. Okay. Based upon the conversation, I went ahead and
17 coordinated and took advantage of sending people there to
18 qualify. If they qualify, then I get paid a hundred dollars,
19 and then they were able to come back and purchase their phone.
20 And out of that, that's when I came up with Money Solution
21 under birthingmoney.com.

22 Q. Okay. And I want to show you what's been marked as
23 Exhibit 1. You say Money Solution. Did you have a website for
24 that?

25 A. Yes. At first I had a Money Solution site.

11:27 1 Q. And I'm going to show you Defendant's Exhibit 1. Do you
2 recognize that?

3 A. Yes, ma'am.

4 Q. What is that?

5 A. This is showing the front of the building where I was
6 located at on Garners Ferry Road.

7 Q. Is that a screenshot of your website?

8 A. It's a screenshot of it.

9 MS. ZMROCZEK: Your Honor, at this time we would move
10 Defendant's 1.

11 THE COURT: Any objection?

12 MR. PEARSON: No objection.

13 THE COURT: It's admitted.

14 BY MS. ZMROCZEK:

15 Q. Okay. And this -- the website is not active anymore, is
16 it?

17 A. No, ma'am, not active no more because when I first start
18 out with Money Solution, it had nothing to do with the
19 foreclosure, anything. I was involved in network marketing. I
20 was introduced by someone into profit clicking.

21 Q. And is that how you met Mr. Barron?

22 A. Let's see. Yeah, that's how I met Mr. Barron.

23 Q. Okay.

24 A. Yes.

25 Q. All right. And then eventually what kind of work did Money

11:28 1 Solutions do?

2 A. After going through the process with the profit clicking
3 and the Kindred Heart, I got tired of basically meeting people
4 at the restaurant and stuff. That's when I went to that
5 location and opened up a one-room suite downstairs, Suite 114,
6 and then I started getting a bunch of phone calls for help with
7 mortgages and foreclosure and I kept telling, I say, I don't
8 have anything for that. That we don't do.

9 And then from that, I teamed up with somebody who say that
10 they can actually get people loans. Well, while I was doing
11 that, I'm still getting calls for foreclosure and mortgages and
12 I keep telling them, I said, I don't have nothing, so I
13 started -- that's when I start seeing stuff on the news and I
14 started, you know, looking at it and started doing my own
15 research and I --

16 Q. And let me ask you about that own research. Your own
17 research, was that just on the internet?

18 A. No, that was not just on the internet. I would send people
19 to -- I had a connection with someone that was out of town and
20 I had them to go to the Library of Congress and look up certain
21 things for me, and then they sent me a link that the Library of
22 Congress had given them on how to look up certain case laws and
23 certain things online, so then I started using that, based upon
24 what the Library of Congress had provided.

25 Q. And so eventually you opened your -- or your business.

11:29 1 What was the purpose of your business in 2013 and 2014?

2 A. Okay. What happened was, after -- after I grasped upon
3 what was going on with the foreclosure and the information I
4 had learned -- because I do grasp things real fast. If you
5 don't want me to know it, don't allow me to see it, because
6 I -- I got it.

7 And so basically, when I made a decision -- and the
8 decision was based upon the fact that this information I know
9 could help what's going on. And trust me, I got to say that I
10 was green at the beginning, I was very green, and so I made --
11 as soon as I made the decision, the opportunity came knocking.
12 So that would lead me to, you know, get into doing foreclosure.

13 Q. Okay. And you hired -- you -- did you have employees?

14 A. Not at first. At first I was kind of like winging it,
15 because it wasn't like I decided and voila, you know, customers
16 start come knocking at the door. No, that wasn't what it was.

17 It was just like one here -- I made a decision on June 4th
18 of 2013, and on June 6, I was talking to someone that was in
19 the building and he said I know someone who's getting evicted
20 right now. I say, well, just tell them to come talk to me.
21 She called me. She said they had no money. I said, this is
22 not about money. Just come. Let me just do what I know I can
23 do. Just let me do it.

24 Q. Okay. Let me get back to the question that I asked. Did
25 you eventually hire people to help with you?

11:32 1 A. Eventually I did hire people to help when I was downstairs.

2 Q. And who was that?

3 A. What's the lady name?

4 Q. Let me ask you this way: Did you hire Kendra and Linda
5 Jackson?

6 A. I hired Kendra and Linda, that would have been 2014, after
7 I moved upstairs into the 31 suite.

8 Q. Okay. And did you provide them any training?

9 A. I -- for the first few weeks, I basically walked them
10 through how I had customized things and this is what you do,
11 this is how you follow this here, this is what you -- you know,
12 I basically, like, guide them, and then after a while they just
13 catch on and then they just know what to do.

14 Q. Okay. Did you ever tell them or teach them to write
15 instruments off of closed accounts?

16 A. No. That was something that one of them had discovered
17 from YouTube and was applying it.

18 Q. Okay.

19 A. I didn't -- I didn't -- I didn't engage in that.

20 Q. And do you remember Kendra -- do you remember working
21 with -- or working with Ms. Joretta Jackson?

22 A. I remember when Ms. Joretta Jackson and her pastor came.

23 Q. And her pastor came. And you did a birth certificate
24 authentication for her?

25 A. Yes, I did.

11:33 1 Q. Okay. And were you asked to do anything else?

2 A. As far as I can remember, it was something to do with tax,
3 but at the time I wasn't too comfortable with dealing with the
4 tax issues.

5 Q. So you declined to do that.

6 A. Right.

7 Q. And so any -- did you and Kendra have further discussions
8 with it after that?

9 A. No, we did not.

10 Q. Did you authorize her to do any of the things that have
11 been entered into evidence, write these checks off of closed
12 accounts?

13 A. No, I did not.

14 Q. Did you instruct her to do it?

15 A. No, I did not.

16 Q. Did you teach her to do it?

17 A. No, ma'am.

18 Q. Okay. Did you know anything about that?

19 A. About it? I didn't --

20 Q. Right before it happened. I mean, I know you've learned
21 since, but...

22 A. No, I didn't know anything about it. The only time I find
23 out about it is when I got indicted and I'm trying to figure
24 out who is the Loretta [sic] Jackson because at the time the
25 name wasn't ringing a bell.

11:34 1 Q. You mean when you got indicted.

2 A. Indicted this year here.

3 Q. Okay.

4 A. And --

5 Q. So, and I want to talk a little bit about -- let's just
6 jump ahead a little bit. Your business was to help people try
7 to find ways to help their finances or improve their finances?

8 A. Yes.

9 Q. Okay. And you would do certain documentation work for
10 them?

11 A. Yes, ma'am.

12 Q. And we've seen these 32 boxes that were taken from your
13 office. All that information was taken from your office,
14 right?

15 A. Yes, ma'am, uh-huh.

16 Q. And at that point, how many client files would you guess
17 you had? Are those open and closed client files?

18 A. There was open and closed client files.

19 Q. Okay.

20 A. There would have to be somewhere in the neighborhood of a
21 hundred, over a hundred.

22 Q. Okay. How many clients were you able to help in one way or
23 another?

24 A. It was numerous, in numerous different ways that I was able
25 to help them because -- if you don't mind, can I back up to

11:35 1 where my first reality check came in place?

2 Q. Sure.

3 A. When I made a decision to deal with foreclosure issue, it
4 would have been my second client, whose file should be in the
5 digital file, James Lawson, from Charleston, South Carolina.
6 His wife was Joanne Lawson.

7 And I took the information that I learned from my research
8 and I helped him to -- because they had been dealing with a
9 lawyer and all the stuff for that and nothing was working out
10 for them, so I told them, I said, do this here, we do this
11 here, we did this.

12 And so we went to the trial, the hearing, foreclosure
13 hearing. I was with them. I sat at the table with them on the
14 defendant's side between him and his wife, and I already knew
15 that they was not going to allow me to ask any question, so I
16 had already prepared the questions for them. So as he was
17 going down the question, lines of question, he got to one
18 particular question that I had put on there, was my loan paid
19 in full when I went into default? Because I discovered that
20 once it goes in default, insurance pays off.

21 Q. Okay. Now let me --

22 A. The attorney jumps up, he can't answer that, I can't answer
23 that. I'm not going to -- we here --

24 MR. PEARSON: Objection, hearsay.

25 A. Okay.

11:37

1 THE COURT: Wait.

2 A. Well, okay, I understand now.

3 THE COURT: Wait just a minute. Wait just a minute.

4 Okay. Let's let your lawyer explain.

5 BY MS. ZMROCZEK:

6 Q. Yes. Okay. I'm going to stop you right there, okay?

7 A. Okay.

8 Q. Let me ask you this question. Do you practice law?

9 A. No, I don't practice law.

10 Q. Do you tell anybody you're an attorney?

11 A. No, I never told anybody I was attorney.

12 Q. I want to move on. I understand that you want to go into
13 the details of your help, but --

14 A. But that's where one of those exhibits came in from.

15 Q. Right, right.

16 A. Okay.

17 Q. So there are -- there is documentation of you helping
18 people.

19 A. That's correct.

20 MS. ZMROCZEK: Okay. And I believe, Your Honor, we
21 already have shown these public index searches. These are 4,
22 5, and 6, okay, I believe we're going to move in at this time.
23 Defendant Wright's Public Index Search No. 4 is in relation to
24 Mr. Wilson, Leon Wilson. No. 5 is in relation to Mary
25 Pimpleton. And No. 6 is in relation to Mr. Sass.

11:38

1 THE COURT: Okay.

2 MR. PEARSON: No objection.

3 THE COURT: All right. They're admitted.

4 BY MS. ZMROCZEK:

5 Q. Okay. And I want to talk about Mr. Sass really quick.

6 When the government came in and raided your building, they took
7 this picture off the wall, right?

8 A. That's correct.

9 Q. Or off a desk.

10 A. That's correct.

11 Q. And it says that the mortgage was deemed satisfied, right?

12 A. That's correct.

13 Q. And when you go on the court record search, it shows that
14 this order has been certified and that the case is closed,
15 correct?

16 A. That's correct.

17 MS. ZMROCZEK: All right. And again, that's

18 Defendant's No. 6, Your Honor.

19 BY MS. ZMROCZEK:

20 Q. I want to talk about the other people that you came in to
21 help. We heard from some of them that were sitting here. When
22 Ms. Mary Pimpleton came in yesterday, do you recall her case?

23 A. Yes. Her case was -- was so far back I had to really dig
24 deep to try to remember everything that went on. I know there
25 was an issue where I spoke to -- just strictly on her behalf.

11:39 1 Q. Okay. Hold on one second. This is what I want to ask you.

2 A. Okay.

3 Q. When people came to ask for your help --

4 A. Uh-huh.

5 Q. -- and they gave you money --

6 A. Uh-huh.

7 Q. -- did you ever tell them that you would guarantee that
8 this would work?

9 A. No, ma'am.

10 Q. Okay. Did you ever tell people to stop paying their
11 mortgages?

12 A. No, ma'am. When they came to me, they already was not
13 paying their mortgage.

14 Q. Okay. Well, did you ever tell people not to pay their
15 bills and to pay you instead?

16 A. No, I never told them that, no.

17 Q. Okay. Did you -- there's been a lot of discussions about
18 the Glovers and the Henrys. Do you recall when you first had
19 them in your office?

20 A. Yes, I did.

21 Q. Was that after they had already been indicted?

22 A. Oh, yeah, because I didn't have no clue who they were.

23 Q. Okay. You didn't have anything -- you didn't have anything
24 to do with that conspiracy.

25 A. No.

11:40 1 Q. Okay. And in fact, your records show that it was around
2 September of 2015.

3 A. That's correct.

4 Q. Okay. And that's when you kind of came to know them.

5 A. That's correct.

6 Q. And you said -- I want to go back to the 20th, the day that
7 the government came in and took all your files.

8 A. Uh-huh.

9 Q. At that point, did Agent Desmond or IRS Agent Woods ever
10 say to you -- or I'm sorry, did they ever say to you what
11 you're doing is illegal, stop, in 2015 when they came and
12 raided your office?

13 A. No, ma'am, not at all. I'm 100 percent sure of that.

14 Q. Okay. Did they ever tell you to shut down your business,
15 pack up, and move out?

16 A. No, ma'am.

17 Q. But they did take everything, right?

18 A. They took everything, and the last thing that Mr. Desmond
19 said to me on his way out was that --

20 MR. PEARSON: Objection, hearsay.

21 BY MS. ZMROCZEK:

22 Q. You can't say what people said to you, okay?

23 A. Okay. The last thing I -- well, okay.

24 Q. That's okay. We'll move on. But were you ever told by
25 Agent Desmond or any IRS agent to stop conducting your

11:41 1 business?

2 A. No.

3 Q. Okay. Were you ever told what you were doing was illegal?

4 A. No.

5 Q. Okay. Were you scamming people? Was that your purpose?

6 A. No, that was not -- as a matter of fact, when certain
7 incident went down with people losing their house, I remember a
8 couple of times that Kendra and them had to come and kind of
9 like cover, because I would break down and cry because I know
10 what I did was right, and based upon what I discovered with
11 Mr. Lawson, it's just what the system does to you.

12 Q. Okay.

13 (Pause.)

14 A. And if you --

15 MS. ZMROCZEK: At this point, I want you to -- I don't
16 have any further questions at this time. I do want you to
17 answer any questions that Mr. Pearson has.

18 DEFENDANT WRIGHT: Okay. One question I want to ask
19 my attorney, please?

20 THE COURT: You don't get to ask the questions. You
21 just answer the questions.

22 THE WITNESS: Okay.

23 CROSS-EXAMINATION

24 BY MR. PEARSON:

25 Q. Good morning, Mr. Wright.

11:43

1 A. Good morning, sir.

2 Q. I just have a couple of questions for you, actually. I
3 wrote this down while you were testifying. You say that you
4 grasp things real fast. I take that to mean that you have a
5 keen mind and understand things very well.

6 A. Yes, sir, I do.

7 Q. Okay. Now, having a keen mind and understanding things
8 well, you are aware that neither the IRS nor the FBI share your
9 belief system.

10 A. I am aware of that.

11 Q. And you've been -- you've been told that.

12 A. Uh-huh.

13 Q. You've been told that your system is based on faulty law,
14 right?

15 A. By who?

16 Q. Has anyone ever told you that?

17 A. No. No one from any authority ever told me that my stuff
18 was based on -- on faulty law. Not even them when they came to
19 my office.

20 Q. Mr. Wright, do you remember receiving a letter from the
21 Internal Revenue Service?

22 A. Yes, I do.

23 Q. And do you remember that letter from the Internal Revenue
24 Service specifically talking about the things you were doing
25 and how they were frivolous?

11:44 1 A. When I received that letter, I have no indication of what
2 they was actually referring to, because I did not send
3 something in arguing about paying taxes.

4 Q. That wasn't my question. Did you receive this letter where
5 they explained that if you persist --

6 MR. PEARSON: Can we pull up Government's No. 9?

7 BY MR. PEARSON:

8 Q. My question is, do you remember receiving this letter --

9 A. Yes, I do. I remember.

10 Q. -- that says, If you persist in sending frivolous
11 correspondence, we will not continue to respond to it.

12 Then the letter goes on and talks about tax scams and then
13 directs you to very specific provisions of law that explain why
14 you can't do the things that you are doing. Do you remember
15 receiving that?

16 A. I remember seeing that letter.

17 Q. So when you just said no one had ever told me that, you
18 were not telling the truth.

19 A. That is a generic letter that people get all the time. It
20 could be one little thing that's on there and they just push a
21 button and that's sent. You get people getting that same
22 letter.

23 Q. That wasn't my question. My question was: When you just
24 told this jury that no one had ever told you this, that wasn't
25 accurate, was it?

11:45 1 A. According to the letter --

2 THE COURT: Mr. Wright, just a minute. You have to
3 answer the question and then you may explain your answer.

4 A. Okay. No.

5 BY MR. PEARSON:

6 Q. That was not accurate?

7 A. The reason why I said that, because I said no one of the
8 law enforcement that I come in contact with, judges, attorneys,
9 in what I'm doing, never came and told me anything that I was
10 doing at the point was -- was wrong. That right there is
11 something personal.

12 MR. PEARSON: Ms. Bott, could we have No. 8?

13 BY MR. PEARSON:

14 Q. So also, this letter that you wrote to Allen Myrick where
15 you explain that you had consulted with an attorney and that
16 you had been told that what you were doing was incorrect,
17 you're saying that you don't have any knowledge of this letter
18 either?

19 A. Yes, I have knowledge of that -- of that information right
20 there. That's why I was trying to get my attorney to -- so I
21 can address that issue, because that had to do with something
22 with Mr. Lawson.

23 Q. So again, when you just told this jury a minute ago that no
24 one had ever told you that what you were doing was wrong, that
25 wasn't accurate.

11:47 1 A. That part was being accurate. As far as when I referring
2 to -- when you was expressing to me that what I was doing, as
3 far as the stuff that I was doing in my office, that being
4 illegal, that was what I was referring to, because I had
5 already made some adjustments based upon what they were talking
6 about, what they were trying to imply. I had already taken
7 care of that issue.

8 Q. What's the date on this letter?

9 A. That's back in 2013.

10 Q. So back in 2013, you were aware that people were telling
11 you that what you were doing was wrong. Back in 2013.

12 A. That's the only incident I ever had right there because --
13 and the reason why I say that is because I've been to court
14 with so many different people. I even had a judge tell me to
15 even write a brief for a client. He told me he can't allow me
16 to talk in his office, in the court, because I was dealing with
17 law, but write the brief and have the client to sign it.

18 Q. But this was 2013.

19 A. This was way past 2013.

20 Q. No, this letter was 2013.

21 A. That letter was 2013.

22 Q. So you started Money Solutions in 2013.

23 A. Yes.

24 Q. Gotcha. Now, you also testified just a moment ago, and
25 please tell me if I am wrong, but you said that you never told

11:48

1 anybody you were an attorney.

2 A. Oh, no, I never told anybody I was an attorney. That's
3 different from being a private attorney general.

4 Q. You never told anybody you were an attorney.

5 A. No, I never told nobody I'm attorney.

6 Q. Did you tell them you would go to court with them?

7 A. Oh, yeah, I told them I would go to court with them.

8 Q. Did you tell them you could contact the judge for them?

9 A. I don't know about telling them I can contact the judge,
10 but I have contact judges on people behalf.

11 Q. Mr. Wright, and please correct me if I'm wrong, but just a
12 few moments ago you said, I'll call Judge Strickland on your
13 behalf. Did you not say that a couple of minutes ago?

14 A. Yeah, I -- okay. Let's slow it down.

15 Q. Sure. We'll go just as slow as you need.

16 A. Okay. You said to me, did I tell anyone that I will
17 contact the judge for them. What I said, when I was getting
18 ready, I told you that I had contact the judge for what was
19 going on with Ms. -- Ms. Pimpleton. I did that.

20 Q. All right. So you told Ms. Pimpleton you would contact
21 Judge Strickland for her, right?

22 A. In the situation that was going on at the time, I said,
23 "Let me call Judge Strickland," and that's what I did.

24 Q. Right.

25 A. Yeah.

11:50 1 Q. You told her you'd contact him. That's all I'm asking --

2 A. Yeah, that's right.

3 Q. -- if that's what you said.

4 A. Yeah.

5 Q. Yeah. You said you'd contact Judge Strickland for her.

6 A. That's correct.

7 Q. All right. And you did tell people that you were a private
8 attorney general.

9 A. Private attorney general.

10 Q. Now, I'm going to ask you this question. Did you give
11 anyone a printout or a brochure or an explanation as to what
12 you feel the difference between an attorney and a private
13 attorney general is?

14 A. No, ma'am -- I mean, excuse me, no, sir.

15 Q. No worries.

16 So you told people you were a private attorney general. I
17 just want to make sure I have this right. You told people you
18 were a private attorney general, but you're claiming here today
19 you never told anybody you were an attorney.

20 A. That's correct. That's a big difference.

21 Q. But you would agree with me that you never actually
22 explained -- you didn't explain to people what -- the
23 difference between those two?

24 A. I know when I spoke to people, I indicated that I was not
25 an attorney, that I operate in the capacity as a private

11:51 1 attorney general, which is right there in the codes.

2 Q. And you expect people to know the difference between that?

3 A. Well, I indicate to them I'm not a licensed attorney.

4 Q. So that's a yes, you expect people to know that.

5 A. Yeah. I made sure that they know that I was not a licensed
6 attorney.

7 Q. All right. I just got a couple more -- just a couple more
8 questions.

9 Mr. Wright, how long did you operate that electrical
10 business?

11 A. From 1988 to 2001. I started off with a bicycle.

12 Q. All right. And so -- I'm sorry, that -- so you did that
13 for quite a while.

14 A. For quite a while.

15 Q. All right. You had employees?

16 A. Yeah, I -- at the end of the day when I downsized, I had
17 nine trucks, 16 guys.

18 Q. All right. So you -- did you handle fairly large or
19 complex jobs?

20 A. Oh, yes. I did subdivisions, I did residential,
21 commercial, and I did industrial.

22 Q. Did you work with developers and home builders, that sort
23 of thing?

24 A. Yes, sir, I did.

25 Q. All right. And when you did the electrical work for the

11:52 1 home builders and the developers, did they pay you for it?

2 A. Yes, sir, they did.

3 Q. And how did they pay you?

4 A. They paid me with checks.

5 Q. And did you then pay your employees?

6 A. Yes, I did.

7 Q. With checks?

8 A. With checks.

9 Q. How often?

10 A. At one point I would do it every week, and then I went to
11 every two weeks.

12 Q. During this time while you were running this electrical
13 business, did you ever tell any of the developers or home
14 builders to not worry about giving you checks because you could
15 just go ahead and take these instruments to offset the debt
16 that they owed you?

17 A. No, sir. I was not in that conscience at that time. I was
18 nowhere near that.

19 Q. But you testified that this has been something that's been
20 in the codes for a long time, right?

21 A. What I just told you is that I was not aware.

22 Q. I'm sorry, sir, that's not my question. You testified that
23 these things that you believe have been in the code for a long
24 time.

25 A. Oh, yes, yes.

11:53 1 Q. And that would include the time that you were in fact an
2 electrical -- that you owned the electrical business.

3 A. Yes, sir.

4 Q. So my question then stands to you: Would you have accepted
5 these things for your business?

6 A. If I knew it was existent and I knew how to get it
7 processed without it being blocked, yes, I would have.

8 Q. Okay. Great. I'm glad you say that. Now do you
9 understand how all of this is supposed to work?

10 A. I know how it's supposed to work.

11 Q. All right. Now that you know how it's supposed to work,
12 did you ever accept this system of payment for your business at
13 Money Solutions?

14 A. Because I'm not a corporation, that doesn't apply to me.
15 We can't do it that way.

16 Q. Oh, it applies --

17 A. Corporation -- corporation has the ability to do that.

18 Q. I understand. It applies to everybody else, not you?

19 A. No. I'm just saying that it's a process for corporations.

20 Q. So you didn't take your process. You didn't accept your
21 process as payment.

22 A. I couldn't get a process because I'm not a corporation.

23 Q. So that would be a no.

24 A. That would be a no.

25 Q. All right. Mr. Wright, when did you meet the Henrys?

11:54 1 A. I met them without knowing I met them at a meeting because
2 someone -- one of my clients had told me they need to bring
3 somebody by my office, so there was a gentleman in town doing a
4 little -- a seminar. I went by just to check it out, see what
5 he was talking about, but I did not communicate with them. I
6 just spoke to them, not knowing that's who that person was
7 talking about.

8 Q. I don't think you've quite gotten to answer that question I
9 asked you. When did you meet the Henrys?

10 A. Oh, that would have been around sometime in the first part
11 of September.

12 Q. September of?

13 A. 2015.

14 Q. So you only met them in September of 2015.

15 A. That's correct.

16 Q. Now, do you remember engaging in an interview with Special
17 Agent Desmond in November of 2015?

18 A. Yes.

19 Q. Do you remember speaking to Agent Desmond about your --
20 about your knowledge of the Henrys?

21 A. Yes.

22 Q. Do you remember telling Agent Desmond that you had known
23 Mr. Jefford Henry and that you all did things for each other,
24 but that he didn't pay you for them. Do you remember that?

25 A. Yes, sir.

11:56 1 Q. And in exchange, you helped him with his legal process. Do
2 you remember saying that?

3 A. Yes.

4 Q. What did you mean, "you helped him"?

5 A. Well, I purchased some information from someone out of
6 Virginia that had used it and it cleared them up, and so I
7 basically --

8 Q. Wait. What do you mean, "it cleared them up"? What does
9 that mean?

10 A. Oh, they got out of -- they got out of the trouble they was
11 in.

12 Q. Oh, they got out of the trouble they were in?

13 A. Oh, yeah.

14 Q. Where are the Henrys now?

15 A. Well, the Henrys -- I mean, the Henrys are locked up, but
16 not based upon anything I did.

17 Q. But you just said you cleared all their federal problems
18 up. I thought that's what you said.

19 A. No, no, no, no, that's not what I just said. I said I
20 purchased the information that I gave them from somebody out of
21 Virginia.

22 Q. And it cleared it up?

23 A. And that cleared them up, the person that I purchased from.

24 Q. Okay. I'm very confused.

25 A. Okay. The information --

11:57 1 Q. My question to you was about the Henrys.
2 A. Okay.
3 Q. So what did you do for the Henrys?
4 A. I gave them some information in reference to do with the
5 indictment.
6 Q. Uh-huh. Is that what got cleared up?
7 A. No, huh-uh, it didn't get cleared up.
8 Q. Yeah, I'm sorry, I misunderstood what you were saying.
9 A. Okay.
10 Q. That's my bad. I'm sorry.
11 A. Okay. Uh-huh.
12 Q. So that didn't clear up anything for them.
13 A. No.
14 Q. Got it. Now, Mr. Wright, you testified a little earlier
15 about your work with network marketing and profit clicking and
16 this Kindred Hearts gifting program. Mr. Wright, did you know
17 Leon Wilson?
18 A. Yes, I did.
19 Q. And how did you -- did you meet Mr. Wilson through this
20 Kindred Hearts program?
21 A. I met Mr. Wilson -- no, I met Mr. Wilson through profit
22 clicking.
23 Q. Oh, you met him through your other profit clicking -- what
24 do you want to call it?
25 A. It wasn't mine. I became a member of a group that was down

11:58 1 there already --

2 Q. Oh.

3 A. -- that he was also a part of.

4 Q. So we'll just call it your group -- we'll just call it a
5 group, the profit clicking group.

6 A. The profit clicking group.

7 Q. And did you get associated with that Kindred Hearts giving
8 program?

9 A. Yes, I did. I got involved with that also.

10 Q. Now, did you collect the money for those Kindred Hearts
11 people?

12 A. The people that was in my group, 'cause what happened is
13 you collect the money and then you give it to --

14 Q. I'm sorry, you can clearly explain, but my question is very
15 simple.

16 A. Yes.

17 Q. Did you collect the money?

18 A. Well, for that particular small group that I was supposed
19 to deal with.

20 Q. So you collected the money for this gifting program. Now,
21 you heard Mr. Wilson testify yesterday that he never got
22 anything back and it just sort of fizzled out. What happened
23 to the money -- all the money you collected?

24 A. Well, it goes to where it's supposed to go. I mean, I
25 don't keep the money.

11:59 1 Q. You say -- where is it supposed to go if not back to the
2 people?

3 A. It goes -- it goes back to -- it goes -- it goes -- this
4 was not my organization. It was just like any network
5 marketing, collect the money and wherever they say the money is
6 supposed to go, that's who you give the money to.

7 Q. Well, where did this -- my question is, where did this
8 money go?

9 A. I don't know -- I don't remember where this go because it's
10 a downstream, and based upon wherever it falls at, that's who's
11 supposed to get the money.

12 Q. But you don't remember specifically --

13 A. I don't remember specifically who -- who got what. That's
14 why I got out of network marketing, because you had no control
15 of what goes on and it might be good and then all of a sudden
16 it just fizzle out.

17 Q. Mr. Wilson -- or excuse me, Mr. Wright, you would agree
18 with me that you are aware that not everyone agrees with the
19 way you look at the law and this program. You would agree with
20 me that not everybody agrees with you.

21 A. I understand.

22 Q. And you've known that for a while.

23 A. Yes. But at the same time is -- what I did not get to
24 reveal to the jury is the information I had here on what my
25 belief was based upon and not some type of theory.

12:00 1 Q. Uh-huh. But you know -- you are aware -- you are aware
2 that people disagree with that.

3 A. Yes, sir.

4 Q. And you have a disagreement with them.

5 A. Yes, sir. It's no different than when I explained to
6 Aimee, my attorney, about, you know, the difference in the
7 story that everybody have heard all they life about the animals
8 going in the ark two by two, and when I come and I say
9 something totally different, even ministers that have been
10 preaching 40 years say, oh, man, that's a kind of new style
11 age. I say, no, sir, you go back and read it for yourself. It
12 was two by two unclean animals and seven by seven clean
13 animals.

14 So that's how I see what I believe in, based upon -- if you
15 go back and look at what I base my -- not theory, base my
16 belief upon, it's something that sits right before your eyes,
17 but you don't see it, because you've been programmed to say
18 this is this and this is that. But when you come to a certain
19 area in life and your conscious opens up, you begin to see
20 stuff that was sitting in your face the whole time and you try
21 to figure out why I did not see this.

22 Q. So you have a disagreement with what other people tell you.

23 A. I have a disagreement based upon what I am able to pick up
24 and see.

25 MR. PEARSON: Thank you, Mr. Wright.

12:02

1 THE COURT: Redirect?

2 MS. ZMROCZEK: Just briefly, Your Honor.

3 REDIRECT EXAMINATION

4 BY MS. ZMROCZEK:

5 Q. And I'm going to let you get to answer that question in
6 just a moment, okay? But the first question that I have is, he
7 asked -- he, Mr. Pearson, asked you about, what happened to the
8 money in the gifting program. First of all, the gifting
9 program is not why you're here, correct?

10 A. Excuse me?

11 Q. The gifting program is not why you're arrested.

12 A. No.

13 Q. Okay. And did you get any money from the gifting program?

14 A. No.

15 Q. Okay. He asked you -- he was asking you about your beliefs
16 and your disagreements with them.

17 A. That's correct.

18 Q. And that you knew that people disagreed with them.

19 A. That's correct.

20 Q. Okay. And there's a difference -- and I think that this is
21 what you were trying to explain. Is there a difference to you
22 between disagreeing and knowing what the law is?

23 A. That's correct.

24 Q. Okay. And what are your beliefs based upon?

25 A. Well, based upon the fact that -- I would start off, first

12:03 1 of all, from the beginning, that there was the declarations of
2 independence.

3 MR. PEARSON: Your Honor, I'm going to object to the
4 reading of these documents.

5 THE WITNESS: I'm not going to read them.

6 MR. PEARSON: Your Honor, I would object to the
7 reading of these documents. I would also object that this
8 appears to be outside the scope of redirect, as we did not get
9 into any of these specifics in either the direct examination or
10 the cross-examination.

11 MS. ZMROCZEK: Well, Your Honor, he was asking
12 questions about his beliefs and what -- if you want to still
13 approach, we can. I believe it's within the scope. He asked
14 him specifically, you've been aware people disagree with your
15 beliefs, and I think that he should be allowed to explain what
16 that is.

17 THE COURT: All right. I'll let you -- I'll let you
18 go into that. Just don't get too carried away.

19 MS. ZMROCZEK: Yes.

20 BY MS. ZMROCZEK:

21 Q. And understand, Mr. Wright, about the limited question that
22 I asked you about your belief.

23 A. Uh-huh.

24 Q. Go ahead.

25 A. So it started out with the fact that they wanted to

12:04 1 separate from --

2 Q. "They" who?

3 A. The founding fathers wanted to separate because they had a
4 grievance with the government that they were under, and that's
5 why they wrote the Declaration of Independence.

6 Then came forth what the Constitution of the United States.
7 Then one particular area I would point out would be in the
8 Constitution, Article I, Section 10, where the Constitution
9 says that the payment -- legal payment should be in gold and
10 silver. Then from that point -- and this is just a building
11 block leading to where I'm at now. The next thing I would
12 point out would be in 1857, 1858, you know, there was a Supreme
13 Court decision that --

14 MR. PEARSON: Objection, Your Honor.

15 THE COURT: Yeah.

16 MR. PEARSON: He can't testify about --

17 THE COURT: Right, yeah, I mean, I don't think we need
18 to hear about everything that Mr. Wright believes. We need to
19 talk about --

20 MS. ZMROCZEK: Okay. Let me see if I can help shape
21 the question.

22 BY MS. ZMROCZEK:

23 Q. Mr. Wright, I understand about going through how you got to
24 your beliefs. Let me ask the question this way. Is your
25 belief in a good faith based on --

12:05 1 MR. PEARSON: Objection, calls for a legal conclusion.

2 THE COURT: Yes, I agree.

3 BY MS. ZMROCZEK:

4 Q. Let me ask it this way. Is your belief based on
5 information that you've read?

6 A. That's correct.

7 Q. Is it just information that you've read on the internet?

8 A. No.

9 Q. Is it information that you've read in, like you said, the
10 Constitution and Declaration of Independence and those kinds of
11 constitutional government documents?

12 A. Yes, that I got from the Library of Congress.

13 Q. Okay. And now that you've read all of those things, is
14 that now -- is that what your belief was based upon?

15 A. That is correct.

16 Q. Okay. And did you ever believe -- has it ever been your
17 belief that you don't have to pay taxes?

18 A. No, ma'am, that's never been -- that never was a part of my
19 belief.

20 Q. Okay. When people came to your business, did they pay you
21 money to generate documents?

22 A. That's correct.

23 Q. Did you generate documents?

24 A. Yes.

25 MS. ZMROCZEK: Okay. I believe those are all the

12:06 1 questions I have, Your Honor.

2 THE COURT: All right. Very good.

3 Mr. Brooker, do you have any questions for this
4 witness?

5 MR. BROOKER: If you could indulge me for just a
6 second, Your Honor. I'm looking for one specific document.
7 I'm trying to figure out which one of these boxes it's in. If
8 you'll give me just a second.

9 THE COURT: Okay.

10 CROSS-EXAMINATION

11 BY MR. BROOKER:

12 Q. Mr. Wright, just a few questions, and I'm going to do it
13 right here so I can have access to my computer.

14 A. No problem.

15 Q. Thank you, sir.

16 Mr. Wright, I think you indicated that you employed --
17 Kendra Jackson was one of your employees, and also Linda
18 Jackson; is that correct?

19 A. That's correct.

20 Q. Of course is, is that Linda Jackson, or at least Kendra
21 Jackson, at one point in time, became the office manager of
22 your facility; is that correct?

23 A. Yes, sir.

24 Q. Money Solutions?

25 A. Yes, sir.

12:08

1 Q. And of course is, is it's my understanding is, is that you
2 also offered this authentication of birth certificates; is
3 that correct?

4 A. That's correct.

5 Q. And of course is, is that it's also my understanding is
6 that the purpose of authenticating the birth certificates was,
7 is that if you can authenticate the birth certificate, then of
8 course is, is that the Social Security number that's associated
9 with the birth certificate would somehow become some account in
10 which you could use to discharge debt.

11 A. That is incorrect.

12 Q. Okay. Well, you explain -- I'm sorry, I don't mean to
13 interrupt you. Go ahead.

14 A. I was getting ready to explain. The authentication of the
15 birth certificate is the purpose of claiming ownership of the
16 birth certificate with the holder in due course of the birth
17 certificate, authenticated from the state level to the federal
18 level. The information about the Social Security was something
19 totally different.

20 Q. Explain that to me. Could you explain to me how the Social
21 Security number became some sort of an account with the
22 government that you could use to offset debt?

23 A. This is all messed up now, but -- because I didn't get to
24 get the information in to understanding where my stuff come
25 from. But the Social Security number has a number on the back,

12:10 1 an account number. If you look at that account number, it's no
2 different than the number that you see on the front, on the
3 face of a dollar bill. That is actually an account.

4 So the question become, why would you have a Social
5 Security card with an account number on the back of the Social
6 Security card, because if you can use the front one, then why
7 you cannot use the one on the back? Everything is done with
8 your Social Security number.

9 So what happened is, through my research, through the
10 Federal Reserve, I discovered that that number is attached to
11 an account, and it tells you very clearly on the automated
12 service that we do not hold no personal accounts, just trusts
13 and corporation.

14 On the phone with Kendra at the time when we're trying to
15 fix what she had done without my knowing, where she tried to
16 pay her credit card, talking with the agent and get the numbers
17 correct the way it's supposed to be, we discover that they saw
18 the account. The only thing they wanted to know, do you have
19 authorization? Could you show us authorization to use the
20 account?

21 Q. Okay. And that account number that's on the back of your
22 Social Security card, is that an account number that anyone
23 with a Social Security number has that they can then use that
24 money that's associated with that account?

25 A. Yes.

12:12

1 Q. Okay.

2 A. But they --

3 Q. Go ahead.

4 A. Yes, for discharge. Not for purchasing.

5 Q. For discharge debt. And that includes any debt, whether it
6 be Social Security, whether it be Internal Revenue Service,
7 whether it be mortgage?

8 A. Yes, sir.

9 Q. Okay. And so you did tell clients that; is that correct?

10 A. Yes.

11 Q. Okay. And of course, you also taught that to Kendra and
12 also -- Kendra Jackson and also Linda Jackson, who was your
13 assistants in the business.

14 A. That's correct.

15 Q. Okay. So you taught that technique to them.

16 A. We taught the technique, but we did not engage in the
17 closed account stuff.18 Q. Okay. What is a -- what is a -- and I think -- and I
19 believe this may be an acronym -- a CUSIP, C-U-S-I-P?20 A. CUSIP number is where you can pay a broker to look up your
21 Social Security number on Wall Street and they get the tracking
22 number that identifies that particular number, whatever you put
23 in, and tells you a value, how much money it has. You do it
24 for the birth certificate, you do it for the Social Security,
25 you can do it for anything, including your case number.

12:13 1 Q. Okay. And when you did the authentication for Joretta
2 Jackson, you also did a CUSIP for her to look to see what her
3 value was; is that correct?

4 A. I believe we did. I'm not sure.

5 MR. BROOKER: If I can approach, Your Honor?

6 THE COURT: You may.

7 (Off-the-record discussion.)

8 MR. BROOKER: If I could approach, Your Honor?

9 THE COURT: You may.

10 BY MR. BROOKER:

11 Q. Mr. Wright -- and I know you have a problem with your
12 eyes -- is it possible for you to take a look at this document?

13 A. Yes. Uh-huh.

14 Q. Do you recognize that document?

15 A. Yeah, I recognize that document.

16 MR. BROOKER: If I can have this marked as Joretta
17 Jackson Exhibit No. 7.

18 (The Courtroom Deputy marked Defendant Joretta Jackson
19 Exhibit No. 7 for identification.)

20 MR. BROOKER: I'd like to publish to this the jury,
21 Your Honor.

22 MR. PEARSON: No objection.

23 MS. ZMROCZEK: No objection.

24 THE COURT: It's admitted. I would like to hear what
25 it is.

12:15 1

BY MR. BROOKER:

2

Q. Mr. Jackson [sic], this is the document that's been marked

3

as Joretta Jackson No. 7, and of course is, is that -- let me

4

at least read some things on this, and you tell me whether or

5

not I'm looking at it correctly. At the top of this document

6

it says your CUSIP, C-U-S-I-P, results are as follows, and it

7

has Joretta Jackson and it has fiduciary -- excuse me, Fidelity

8

Growth & Income Fund, and then of course, the CUSIP number is

9

316389550, and inception date --

10

MS. ZMROCZEK: Your Honor, I'm sorry, I don't mean to

11

interrupt but I just wanted to -- before I forgot, he said

12

Joretta Jackson. It says Joretta James, but I believe that

13

he'll clear that up.

14

MR. BROOKER: I apologize. Joretta James. I

15

apologize, Joretta James.

16

BY MR. BROOKER:

17

Q. And it says inception date is 5-8-2018 [sic], net assets,

18

and then of course is, I'm assuming that this is -- let me

19

count the zeros. It says 5,470,000,000 as of 3-31-2014. Is

20

that what it says?

21

A. Yes, that's what it says.

22

Q. And of course is, is that when this was given to

23

Ms. Jackson -- it has Joretta James, but when this was given to

24

Joretta Jackson, is that supposed to be money that is

25

associated with her Social Security number?

12:17 1 A. Yes. Basically what it boils down to is everything is done
2 in groups, groups of anywhere between 10 to 25, so it's a total
3 of anywhere between 10 to 25 other citizens that's in that pool
4 of that amount of money.

5 Q. So my understanding is that through the federal government,
6 that Ms. Jackson, or anyone else who has a Social Security
7 number, has a credit with the federal government, and in this
8 case, Ms. James, Joretta James, who I believe is Ms. Jackson --

9 A. Uh-huh.

10 Q. -- what you're saying is -- I want to make sure I
11 understand this correctly -- is that she has a credit with the
12 United States government in the amount of 5,470,000,000 as of
13 that date.

14 A. That is not a total just for her. What happens is, that's
15 a pool of anywhere between -- the same thing with the birth
16 certificate. It's always a pool of anywhere between 10 to 25
17 different other Social Security numbers linking to that, but
18 there is certain ways that you have to go and try to access
19 that, but -- and that's at the Federal Reserve. The Federal
20 Reserve is not government.

21 Q. Okay. So her -- and so she would have a share, a credit
22 share, along with maybe 10 or 15 other Social Security
23 taxpayers, of over \$5 billion?

24 A. That is correct.

25 Q. And she can use that money to discharge any debt; is that

12:19 1 correct?

2 A. That is correct.

3 Q. And that's what you taught to Kendra and Linda Jackson; is
4 that correct?

5 A. That is correct.

6 Q. And she can use it to discharge IRS debt; is that correct?

7 A. That's correct.

8 Q. Now, a couple of other questions and then I'll be done. I
9 think you testified on direct examination, or either
10 cross-examination, that you never did tax discharge, and I
11 believe this is --

12 MR. BROOKER: If you could indulge me for just a
13 second, Your Honor, let me find the specific document.

14 THE COURT: All right.

15 (Off-the-record discussion.)

16 MR. BROOKER: If I may approach the witness, Your
17 Honor?

18 THE COURT: You may.

19 MR. BROOKER: Thank you.

20 BY MR. BROOKER:

21 Q. If you would take a look at this and tell me whether or not
22 you recognize this form.

23 A. Yes, I do.

24 MR. BROOKER: If I could have this marked. This would
25 be, I believe, Joretta Jackson 8.

12:21 1 (The Courtroom Deputy marked Defendant Joretta Jackson
2 Exhibit No. 8 for identification.)

3 MR. BROOKER: And I move to have this entered into
4 evidence as Joretta Jackson Exhibit 8.

5 MS. ZMROCZEK: No objection.

6 MR. PEARSON: No objection.

7 THE COURT: All right. It's admitted.

8 BY MR. BROOKER:

9 Q. Mr. Wright, I think you testified either on direct
10 examination or cross-examination that you did not do IRS or
11 tax -- dissolution of tax debt; is that correct?

12 A. Yeah. What that was about was I was not comfortable doing
13 it the way that -- the procedure in which they were talking
14 about having it done, I was not comfortable doing it that way.
15 I had other ways of dealing with the tax issues --

16 Q. But --

17 A. -- not dealing with no closed account.

18 Q. I'm sorry, and I didn't mean to interrupt you, but when you
19 said that you didn't do tax dissolution, that wasn't correct.

20 A. No, huh-uh, I misunderstood what they was actually saying.

21 Q. Okay.

22 A. I knew I had them on the forms.

23 Q. I have here Joretta Jackson 8, and of course is, is that
24 correct me if I'm wrong, this is a Money Solutions, and it
25 looks -- appears as if this is a -- some sort of representation

12:22 1 agreement where Errie Corbitt is actually contracting with you
2 for IRS dissolution debt; is that correct?

3 A. Yes. I believe that was quite after we did Ms. Joretta,
4 because later on -- because later on, what I was doing as I
5 developed and perfected certain things, that's what I began to
6 also do, whereas Ms. Joretta Jackson at the time she was in
7 there, I was not at the level where I was able to do what I did
8 for Errie Corbitt.

9 Q. Okay. And of course is, is that -- and I'll move this up.
10 The date on this representation agreement, you correct me if
11 I'm wrong, is January 13, 2015; is that correct?

12 A. Yes.

13 Q. And so at that time you were doing IRS or tax debt
14 dissolution; is that correct?

15 A. That's correct.

16 MR. BROOKER: If you can indulge me for just a second,
17 Your Honor. Let me look at one more, I think, document that's
18 already been marked into evidence.

19 (Pause.)

20 MR. BROOKER: Just a second, Your Honor. Almost
21 finished.

22 (Pause.)

23 BY MR. BROOKER:

24 Q. Mr. Wright, I want you to take a look at I think two of
25 the -- I think multiple contracts that was previously put into

12:24 1 evidence, and of course is, is that Government 13 is what we're
2 going to look at first. I think that you testified to on
3 direct examination and/or cross-examination, you correct me if
4 I'm wrong, is, is that -- and I believe it was on direct
5 examination, that the UCC information that was put on those two
6 instruments that was created for Joretta Jackson, that you
7 didn't do the UCC research or anything like that. Is that
8 correct?

9 A. I was never asked that question about the UCC.

10 Q. I thought that -- and I might be wrong, but if your
11 recollection -- you tell me your recollection. Did you ever do
12 the research -- or the UCC research that was identified on the
13 two checks?

14 A. Oh, yeah, yeah, I'm familiar with the UCC, oh, yes.

15 Q. Okay. And of course is, is that if I'm not mistaken, if
16 you indulge me for just a second, let me pull those two checks.

17 MR. BROOKER: Those two checks are identified as
18 Government 12 and Government 11, and I'm going to publish -- I
19 only need one of them -- I'll go ahead and publish 11.

20 A. I think it was getting that testimony mixed up with the
21 agent's. The agent's was the one that didn't never look them
22 up.

23 BY MR. BROOKER:

24 Q. Okay. Well, I'm sorry, I'm going to ask you a question
25 about it anyway. Okay. On the -- Government's 11, the check

12:26 1 that was generated for Joretta Jackson, at the bottom where it
2 says signature, on the signature line, it has UCC 1-308/UCC
3 3-415. Did you do that UCC research and taught that to Kendra
4 Jackson and Joretta Jackson -- excuse me, Kendra Jackson and
5 Linda Jackson?

6 A. Yes, I know very well about the UCC 3, but like I say, I
7 didn't do that.

8 Q. Do you know about UCC 1?

9 A. Yes, reserving all your rights.

10 Q. Okay. So you did research that and was aware of that; is
11 that correct?

12 A. Oh, yes, I'm aware of the UCCs. That's where you get your
13 remedies at.

14 Q. And in fact, at least on the Government's No. 13, which is
15 your contract for Merrit Lee Barron, and that's up on the
16 screen, if you would take a look at the bottom section of that
17 contract where it says UCC filings --

18 A. Uh-huh.

19 Q. -- isn't there a -- isn't there a service for UCC-1 and
20 UCC-3?

21 A. Yes, where we do a non-UCC filing.

22 Q. And so what you're saying is that you didn't taught that to
23 Kendra Jackson and Linda Jackson?

24 A. No, I didn't say I didn't teach them about UCC. UCC,
25 that -- that's not -- that's nothing that's pertaining to just

12:28 1 doing checks. That's doing just everything in life when you
2 write your signature or whatever, you put that UCC down there,
3 reserving your rights. If you're doing something with that
4 3-414, you look it up, it tell you exactly what it says. Every
5 state has UCC -- is under the UCC, every state.

6 Q. So just in case, I'm going to ask you this one more time so
7 that we can make it clear to the jury. At the time in which
8 those two instruments, I think they are 11 and 12, that was
9 generated for Joretta Jackson, at that time you did perform, as
10 a part of your service in Money Solutions, IRS debt dissolution
11 services.

12 A. Yes, I did.

13 MR. BROOKER: Thank you.

14 MS. ZMROCZEK: Just very briefly, Your Honor.

15 FURTHER REDIRECT EXAMINATION

16 BY MS. ZMROCZEK:

17 Q. Just so we can be clear, Mr. Wright, you did not
18 authorize -- in fact, you didn't condone nor authorize
19 Government's 11 and 12.

20 A. No, ma'am, not at all. I was totally unaware.

21 Q. Right. And also he asked you about the CUSIP, and I think
22 he put it in as Joretta Jackson's No. 7. Is that something
23 that -- some program you created?

24 A. No, ma'am. This is something you have to go outside and
25 pay for and they charge you anywhere from 2- to 3-,

12:30

1 sometimes \$400 to get that information.

2 Q. Okay. So when we see that on your charging sheets, that's
3 just you collecting money for somebody to -- and then you pay
4 that money to that program.

5 A. That's correct.

6 Q. Okay. So does that money, when they pay you for that --
7 for example, he had Mr. Merrit's -- Merrit Lee Barron's -- I
8 don't know what government number it is. He had his contract
9 up there and it had CUSIP and it had a checkmark and a number
10 by it. Now, were you making a profit off of that or was that
11 what you charged to run the program?

12 A. No, I made some money off of it. It all depends on who I
13 was able to get it from, 'cause each -- I mean, people out
14 there, the brokers, they have different prices. Some of them
15 have outrageous prices.

16 Q. So some people -- but you had to pay somebody to get that
17 report?

18 A. I had to pay somebody, that's correct, because that's not
19 my expertise. I don't do anything with brokerage or anything
20 like that.

21 Q. So you pay somebody and you get that report and then that's
22 why you charge people.

23 A. That's correct.

24 MS. ZMROCZEK: Okay. Thank you.

25 MR. PEARSON: I have a redirect -- or a recross based

12:31 1 on that.

2 RE CROSS-EXAMINATION

3 BY MR. PEARSON:

4 Q. I just have three quick questions. Ms. Jackson's Exhibit
5 No. 7, this CUSIP report, let me just ask you about this.

6 Mr. Wright, where did you get this document?

7 A. I pay a broker and they do it all the time. I pay them
8 to -- they ask for certain information, ask for the person's
9 name, and then you give them whatever that you want and then
10 they'll go in and they'll pull it and they'll give it to you or
11 either if you want the whole securitization of it, they can
12 do that too, but for a much higher fee. We just deal with just
13 getting the CUSIP number to track that security.

14 Q. So, and I want to make sure I understand. You say that you
15 gave your money to somebody else and then they sent you this
16 piece of paper with this clip art graphic and this thing that
17 says this -- that Joretta James is worth -- or the pool of
18 Joretta James is worth almost five and a half billion dollars?

19 A. That's correct.

20 Q. How much did you pay for that?

21 A. I don't know what I paid for it at that time because it all
22 depends who I'm able to get through with. They be anywhere
23 from 250 and I've paid up to -- I have paid upwards to
24 almost \$700.

25 Q. And who exactly did you send this money to?

12:32

1 A. To whoever the broker is.

2 Q. Yeah, but who? Who are your brokers? Who are these people
3 that you are talking about?

4 A. I don't know if I'm at liberty to give their names.

5 Q. Well, you're testifying, aren't you?

6 A. Yes, I'm testifying.

7 Q. So the question is, who are we talking about? Who are you
8 saying you're giving these money to?9 A. There's one, a gentleman I deal with is called Wes --
10 Wesley -- Wesley Jarvis.

11 Q. And you give Mr. Jivers -- is that what you said?

12 A. Yes, Mr. Jarvis.

13 Q. You paid Mr. Jivers for this.

14 A. Yes, whatever they charge.

15 COURT REPORTER: Could you spell that name for me,
16 please?17 DEFENDANT WRIGHT: I think it's J-A-R-V-I-S, I
18 believe. Jarvis.19 MR. PEARSON: Ms. Bott, could you pull up Government's
20 8 again?

21 BY MR. PEARSON:

22 Q. You also engaged in some testimony a couple of minutes ago
23 concerning your use of this program in tax and how you used to
24 not do it and how maybe you did it a little bit later. I'm
25 just going to ask you a specific question about this. This

12:34 1 letter is written to Mr. Allen Myrick. Do you know who that
2 is?

3 A. Yes, I do.

4 Q. And who is Mr. Myrick?

5 A. He's the guy works at the Attorney General Office in
6 Columbia, South Carolina.

7 Q. All right. Is he a lawyer? Prosecutor? Who is he?

8 A. He's DEA -- I forgot if that's what they call him.

9 Q. Okay. And finally, Mr. Wright, are you confident in this
10 process that you tell people about?

11 A. I am very comfortable.

12 Q. Not comfortable. Confident.

13 A. Say it again?

14 Q. Confident.

15 A. I'm confident. I'm confident.

16 Q. And did you express this confidence to your clients?

17 A. Yes.

18 MR. PEARSON: Nothing further. Thank you.

19 MS. ZMROCZEK: Just one follow-up.

20 FURTHER REDIRECT EXAMINATION

21 BY MS. ZMROCZEK:

22 Q. And I want to make sure, your confidence, was that a
23 guarantee that this would work?

24 A. After my first intervention with the court, I couldn't
25 guarantee anybody anything because I have to just fight for

12:35 1 what I know, working with the people and stuff like that.

2 Q. And that knowledge is based on the documents and government
3 documents that you've --

4 A. Government documents that I have done and some of the
5 response that I've got from some of the judges in reference to
6 what I've done, you know, because they're not -- all of them
7 are not forthcoming. It's just -- it's a mess out there.

8 MS. ZMROCZEK: Thank you, Your Honor. That's all I
9 have.

10 THE COURT: All right. Mr. Wright, I believe they're
11 finished with you. You may step down.

12 THE WITNESS: Okay.

13 MS. ZMROCZEK: Your Honor, for purposes of scheduling,
14 may we approach?

15 (Sidebar Conference:)

16 MS. ZMROCZEK: So I have another witness. She is
17 going to be here at 1 o'clock because I wasn't sure with the
18 timing -- I know -- so I didn't know if we could take an early
19 lunch, talk about jury charges, and then 'cause --

20 THE COURT: Well, it's not early.

21 MR. PEARSON: It's not early. It's 12:30.

22 THE COURT: I was going to bring them back at 1:45,
23 but I was maybe thinking before -- either beginning of lunch
24 break or after, we could talk about the charge.

25 MS. ZMROCZEK: Okay, I think we can do that.

12:36 1 THE COURT: And I'll just go ahead and tell you all, I
2 looked through -- well, two things. One of them, and we'll put
3 this on the record in a little bit, but the superseding
4 indictment that can go back with them, obviously I'm going to
5 instruct them as to the evidence, a lot of that has kind of
6 been changed with some of the counts dismissed and such.

7 MR. PEARSON: Right.

8 THE COURT: I didn't know if you all wanted to either
9 not send it back --

10 MS. ZMROCZEK: Not send it back, yeah.

11 THE COURT: -- or if you wanted to redact.

12 MR. PEARSON: I think we can easily redact just by
13 taking his name out of it.

14 THE COURT: Then probably somebody needs to get on
15 that.

16 And then the other thing is, on those *Marinello*
17 information, I need you all to look at -- you've got some of
18 the information in your charge, Mr. Brooker wants a little bit
19 more, but there was no citation to some of what I saw in that,
20 so I need, if you can, for you all to try to --

21 MR. PEARSON: Work on it.

22 THE COURT: -- work on that.

23 MR. PEARSON: Sure.

24 MR. BROOKER: Okay.

25 THE COURT: And I don't think we're going to have --

12:37 1 we got a request from you about reliance on professionals.

2 MR. BROOKER: Uh-huh.

3 THE COURT: I don't know if you object to that.

4 MR. PEARSON: I don't particularly object to it. I
5 mean, I think it's -- I have to go back and make sure that it's
6 all properly cited.

7 THE COURT: Okay. Those are the things that popped
8 out at me. Nothing too, too major. So maybe let's look at
9 that at the beginning of the lunch break and then before I
10 bring them back in, we'll talk about it.

11 MS. ZMROCZEK: Okay.

12 THE COURT: Okay. Is that all right?

13 MS. ZMROCZEK: Yes. Thank you.

14 MR. PEARSON: Yes, Your Honor.

15 THE COURT: Okay.

16 MR. BROOKER: That's it, that's fine with me.

17 (Before the Jury.)

18 THE COURT: All right. Ladies and gentlemen of the
19 jury, I think it's time for our lunch break, I know I'm ready
20 for one. I'm going to allow you all to go now and be back at
21 1:45 in your jury room, ready to pick up. We will be working
22 before that. We'll be working a lot during your lunch to try
23 to get things moving along as quickly as we can.

24 So don't talk about the case with each other, don't
25 talk about it with anybody else, don't do any research, and

12:38 1 I'll see you back here at 1:45.

2 (Jury not present.)

3 THE COURT: All right. Why don't I see you all back
4 here at maybe -- would 1:15 be enough time for you all to get
5 just a tiny break or do you need maybe until 1:30?

6 MR. PEARSON: Well, Your Honor, we'll do what it
7 takes.

8 THE COURT: Let's be back here at 1:30.

9 MR. PEARSON: All right.

10 THE COURT: Yes. Also, we put together a verdict
11 form. I don't know if you've had a chance to give that to
12 them, but you all might want to go ahead and take a look at
13 that too. All right? All right. See you back at 1:30.

14 (Luncheon Recess, 12:39 p.m. to 1:46 p.m.)

15 THE COURT: Please be seated. All right. I see we're
16 still waiting on Mr. Brooker?

17 MR. PEARSON: Yes.

18 THE COURT: Okay. Has anybody been in contact with
19 him? Anybody know --

20 MS. ZMROCZEK: He was just here.

21 MR. PEARSON: Yeah, he was just here.

22 THE COURT: Oh, he was just here?

23 MR. PEARSON: Yeah. We worked pretty much through the
24 break.

25 MS. ZMROCZEK: Yes.

01:46 1 COURTROOM DEPUTY: I haven't seen him. He hasn't been
2 in the courtroom since 1:30.

3 THE COURT: Okay. See if you can find him, because I
4 thought I told him to be back at 1:30.

5 MS. ZMROCZEK: He may just be in the restroom, Your
6 Honor.

7 AGENT DESMOND: He's coming.

8 THE COURT: Thank you.

9 (Mr. Brooker is now present.)

10 THE COURT: All right. I wanted to give you all a
11 little explanation about where I am with this jury charge.
12 What Katherine is going to hand to you all, if she hasn't
13 already, is a very rough attempt to sort of make sure we've got
14 everything in one document.

15 We have not yet had time or she hasn't had time to go
16 through there and make sure that everything is in the right
17 order and that there's not any extra repetition, but what I
18 wanted to do was to give it to you, and I didn't know -- we can
19 either sort of thumb through this together page by page, or we
20 could go ahead and bring in the jury and finish this next
21 witness. It doesn't matter to me.

22 MR. PEARSON: Your Honor, I'm just going to put this
23 out there because I think it may make things easier. We have
24 largely -- we largely agree. There's some slight disagreement
25 on the necessity of a charge or two, but we largely have agreed

01:48 1 on what comes in, and I think if you give us some time to go
2 through this, we could likely just sort of check everything off
3 and move forward.

4 THE COURT: Okay.

5 MR. PEARSON: We could do that after -- yeah, we
6 certainly could do that after --

7 THE COURT: All right. Why don't we do that. That
8 will work. And we'll be, in the meantime, trying to -- we
9 don't even have the caption right on this one, so...

10 Oh, and about the indictment, I mentioned either not
11 sending it back or redacting it or whatever. Ms. Deal has made
12 a suggestion that I think might be the best, is for me to
13 simply read, as part of my charge, the indictment, and of
14 course they're going to have that back there with them, where
15 it doesn't look like stuff has just been X'd out. I think that
16 might be clearer for them.

17 MR. PEARSON: No objection from us.

18 THE COURT: And not lead anybody to being concerned
19 about what is not in front of them or what. Is that okay?

20 MR. PEARSON: That's fine from the government.

21 THE COURT: That's the way -- what you're going to get
22 is going to read, okay?

23 MS. ZMROCZEK: And no objection from defendant Wright,
24 Your Honor, but I've been advised that my client would like --
25 he has some issues that he can probably verbalize better than I

01:49 1 can.

2 THE COURT: Some issues with what?

3 MS. ZMROCZEK: With, I guess, his testimony and some
4 other information. And I guess I can -- the other information
5 is this. So I've been asking for some tax returns from my
6 client because he was like I did file tax returns and I think
7 that -- you know, and I handed those to the government and we
8 were -- I've been spending the last three days trying to get
9 some authentication. The IRS says that they don't have -- they
10 don't have this -- even though this company is a legit company
11 and it appears that they have been filed through their company,
12 I can't get anybody from the company to come down here or to
13 get on the phone. Mr. Wright also has an issue with that, that
14 I think that he would like to address with the Court.

15 THE COURT: All right. But wait a minute. Before
16 we -- so you have tax returns of Mr. Wright.

17 MS. ZMROCZEK: Correct.

18 THE COURT: Okay. That you want to put in evidence?

19 MS. ZMROCZEK: Yes.

20 THE COURT: But you can't -- you haven't actually
21 gotten them.

22 MS. ZMROCZEK: No, I have the tax returns.

23 THE COURT: Okay.

24 MS. ZMROCZEK: But there was a question as to whether
25 or not they were -- could be -- the filing authentication --

01:50 1 THE COURT: Wait a minute. Let me help you. So you
2 want to put them in and you have an objection.

3 MR. PEARSON: Yes, Your Honor. We would certainly
4 have an objection. I think, if I can clear this up, what the
5 defense has presented to us is some printouts from something
6 called FreeTaxUSA, which I believe is software. What we've got
7 are the actual filings that the IRS received for both
8 Mr. Wright, his wife. They checked all through their -- these
9 filings do not exist in their system. They did not receive
10 these. I have no idea whether or not Mr. Wright did them on a
11 computer and didn't file them. I couldn't speculate to that.

12 What the government can say is that they were never
13 received by the IRS. Therefore, we do not believe that they
14 are relevant evidence to Count 4 of the indictment.

15 THE COURT: Yeah, well, I would tend to agree with
16 that.

17 What would they possibly prove?

18 MS. ZMROCZEK: Right. Well, and that's the issue that
19 I'd be --

20 THE COURT: Okay. Well, then I guess if I must, I'll
21 hear from Mr. Wright himself.

22 DEFENDANT WRIGHT: Your Honor, the first thing I'll
23 deal with is the tax issue. When the -- when I went over with
24 my attorney, Ms. Aimee Zmroczek, I was under the impression
25 that the indictment was talking about 2015 tax returns, okay?

01:51 1 THE COURT: That who was talking about the 2015 tax
2 returns?

3 DEFENDANT WRIGHT: That the indictment was referring
4 to --

5 THE COURT: The indictment. Okay. I just didn't hear
6 what you --

7 DEFENDANT WRIGHT: Yeah, the indictment was referring
8 to the 2015 tax return. Because I told them then, I said, I
9 didn't file a 2015. I said, The last filing I did was 2014.
10 Because they were trying to say that I filed a 2015, but didn't
11 put no Schedule C in there.

12 Well, the problem with that was I didn't do one with
13 my wife, and when I got the letter notarized from my wife,
14 telling them that this stuff was reviewed through Lindsey
15 Graham, sent to Lindsey Graham, because there was some tax
16 issue that we had been trying to clear up, and that I didn't --
17 I did not sign -- do a tax return without doing a Schedule C.

18 As soon as I gave that letter to Ms. Zmroczek, the
19 next thing you know, I'm hearing them talking about 2014 now.
20 I said, Wait a minute, 2014? I thought the indictment says
21 2015. So I -- she told me to get in contact with my wife and
22 get the '12 and the '13 and stuff, because I had Schedule C
23 with every one of my tax returns. As long as I've been in
24 business, I did a tax return.

25 And so when I went to tell my wife that and my wife

01:53 1 told me she couldn't get it to me that day, so she gave me
2 Lindsey Graham's D.C. phone number and she give me Lindsey
3 Graham's phone number here in South Carolina and told me to
4 tell them to call Lindsey Graham and let Lindsey Graham --
5 because he had a tax advocate office that took care of the
6 taxes, the issue that we had going on with the tax return.

7 Then immediately after that, that's when they start
8 saying about the 2014. I said, But that's not what the
9 indictment said. And from that point, I went -- well, prior to
10 that -- prior to that also, before she brought it in here, when
11 we was talking about the tax return, I went in my file cabinet
12 and my wife -- and she gave me the '12 and the '13 and I had
13 the '14 that I did separately -- married filing separately in
14 my possession and I brought them, and I emailed them to
15 Ms. Zmroczek.

16 MS. ZMROCZEK: That's correct. On Tuesday I got
17 those.

18 DEFENDANT WRIGHT: Yes. I emailed them to her. And
19 then the next thing you know, I hear them now talking about
20 2014. I said, Wait a minute, the thing was talking about '15.
21 I said, If that's the case, I get my wife do the same letter,
22 show that the last time me and her filed together was on the
23 2013 paperwork. And when I filed my '14 one was in 2016. I
24 filed late. And every time I file any one, I filed it, it was
25 a Schedule C attached to it.

01:54 1 And when you look inside the FreeTaxUSA, which is
2 credible under the IRS, I had no problem with them, and at the
3 same time, now, all of a sudden, they telling me that none of
4 the stuff is with the IRS.

5 Something's wrong, Your Honor. I'm not allowing this
6 to happen this way because I know something a lot of people
7 don't know. There is something fishy behind this. There's no
8 way that this can go before the jury with that kind of crap
9 going on for deliberation when I know -- he can strike me down
10 right now, 'cause I know we filed tax return with Schedule C.
11 I have no reason to lie about that. That's one thing.

12 THE COURT: All right. I think -- okay.

13 DEFENDANT WRIGHT: Now, the second thing --

14 THE COURT: I wasn't aware there was another issue.

15 DEFENDANT WRIGHT: Ma'am?

16 THE COURT: I didn't realize there was another issue.

17 DEFENDANT WRIGHT: Oh, okay. Okay.

18 THE COURT: I mean, is there another issue that I need
19 to hear from him?

20 DEFENDANT WRIGHT: Yes. The other issue was when me
21 and Ms. Zmroczek was speaking about, you know, how the
22 testimony is going to go and everything --

23 THE COURT: Now, don't talk -- we don't want you to
24 disclose --

25 DEFENDANT WRIGHT: Oh, I'm not going to -- yeah, I

01:56 1 know, I know. But the information that I wanted to relay to
2 the jury, I didn't get a opportunity to relay that because it
3 didn't -- the strip didn't fall out the way that we talked
4 about it was going to fall out because me, Your Honor, when I
5 expressed what I expressed earlier this week in the motion,
6 based upon the Dred Scott decision, it clearly state that an
7 African descendant, free or slave, can never claim U.S.
8 citizenship.

9 THE COURT: Okay. I --

10 DEFENDANT WRIGHT: And that is proven out inside when
11 the voter -- when the civil rights movement was trying to push
12 for our people to be able to vote, they had to put a voter
13 right act in place in order for that to happen. If we were
14 equal, then why would they have to put a voter right act in
15 place for us to vote?

16 And President Bush signed an extension in 2006 for
17 another 25 years, meaning the blacks got 14 more years before
18 they have to do an extension, because to do that, to be able to
19 participate in a political status, you have to volunteer and
20 register to vote, because you're not -- under the Supreme Court
21 ruling, you cannot claim U.S. citizenship.

22 And as I have shown Ms. Zmroczek, that if you look
23 back on our parents' marriage license and stuff, it says
24 American, not U.S. citizen. It wasn't until after the voter
25 registration thing came into play that you start seeing on

01:58 1 people marriage license, U.S. citizen. I am not a U.S.
2 citizen, so I make it for the record, I am an American.

3 THE COURT: All right. Mr. Brooker -- I mean,
4 Mr. Wright --

5 DEFENDANT WRIGHT: Yes, ma'am.

6 THE COURT: -- I've heard enough, okay?

7 DEFENDANT WRIGHT: Okay.

8 THE COURT: Thank you very much. I think I understand
9 it. You think you're an American citizen, not a U.S. citizen,
10 or vice versa. That has absolutely nothing to do with this
11 case, okay?

12 So to the extent that you're trying to offer some
13 support for a motion to put in these documents that have no
14 foundation, that are not IRS documents, about the proof of your
15 tax liability --

16 DEFENDANT WRIGHT: Oh, no, no, no, no. I did --
17 (Cross-talking.)

18 THE COURT: Okay. I've heard enough. I've heard
19 enough. You can sit down. Sit down.

20 Okay. All right. Now, I understand that you have
21 another witness.

22 MS. ZMROCZEK: I have -- yes, Your Honor, I do have
23 one more witness. She is here and ready to go.

24 THE COURT: Is there anything, other than the jury
25 charges and verdict form and stuff like that, that we need to

01:58 1 take up before I bring them in?

2 MR. PEARSON: No, Your Honor, I do not believe so.

3 MR. BROOKER: No.

4 THE COURT: All right. Let's go ahead and bring them
5 in.

6 MS. ZMROCZEK: And Your Honor, since she's the next
7 witness, can I go ahead and bring her in?

8 THE COURT: Yes, that would be fine.

9 MS. ZMROCZEK: Thank you.

10 (Jury Present.)

11 THE COURT: All right. Good afternoon. I hope you
12 had a nice lunch. I did.

13 Ms. Zmroczek?

14 MS. ZMROCZEK: Thank you, Your Honor. We would call
15 Helen Thomas.

16 COURTROOM DEPUTY: Please raise your right hand.
17 State your name for the record.

18 THE WITNESS: My name is Helen Valencia Washington
19 Thomas. I'm a private American civilian of the United States
20 of America.

21 HELEN V. WASHINGTON THOMAS, DEFENDANT WRIGHT WITNESS, SWORN

22 COURTROOM DEPUTY: Thank you. You can have a seat in
23 the witness box.

24 DIRECT EXAMINATION

25 BY MS. ZMROCZEK:

02:00 1 Q. And Ms. Thomas, just because the microphone is way up here,
2 I'm just going to pull it down so that we can hear you.

3 A. Okay.

4 Q. Can you please introduce yourself to the jury? Tell them
5 your name, how old you are, and not your address, but where you
6 live, generally, the city and state.

7 A. Yes, my name is Helen Valencia Washington Thomas. As I
8 just stated, I'm a private American civilian of the United
9 States of America, and I am all around, but I'm here in
10 Richland County.

11 Q. Okay. You're here in Richland County.

12 A. Yes.

13 Q. Thank you. Ms. Thomas, do you know Mr. Ronald Wright?

14 A. Yes, I know him.

15 Q. What kind of -- did you have a business relation- -- what
16 kind of relationship did you have with him?

17 A. He's a friend, like a brother, a mentor. I met him through
18 a friend of a friend in a situation that I was into --

19 Q. What kind of situation were you --

20 A. -- over -- a little over four years ago.

21 Q. Sorry, I didn't mean to cut you off.

22 A. I'm sorry. A little over four years ago.

23 Q. And did you -- were you ever a client of Mr. Wright's, in
24 addition to being his friend?

25 A. Yes, I would say originally.

02:02 1 Q. Okay. Did you elicit certain services from Mr. Wright?
2 Did he provide -- did he help you or provide you with services?
3 A. Yes, he did.
4 Q. Okay. Tell the jury about what kind.
5 A. I was going through foreclosure. I had paid off my loan
6 originally. I'd been fighting with my home for years and then
7 I came to a stumble a little over four years ago and I met
8 Mr. Wright and he helped me through the process.
9 Q. And how did -- and how -- what was the result? How did
10 that work out for you?
11 A. I'm still fighting.
12 Q. Okay. And is that -- when you met with him, has he ever
13 told you that he could guarantee that he would help you?
14 A. No, ma'am.
15 Q. Okay. Has he ever made any promises to you?
16 A. No, ma'am.
17 Q. Okay. But he -- in his business capacity, he has offered
18 services and has provided information or done things to help
19 you, correct?
20 A. Yes, ma'am.
21 MS. ZMROCZEK: Please answer any questions that -- or
22 actually, beg the Court's indulgence.
23 (Off-the-record discussion.)
24 BY MS. ZMROCZEK:
25 Q. How long were you dealing with the foreclosure issues

02:03 1 before you came to Mr. Wright with those issues?

2 A. Since about 2009, but court-wise, about 2012.

3 Q. And you're still in the process, right?

4 A. Yes, ma'am.

5 Q. You haven't lost your home.

6 A. No, ma'am.

7 Q. Because of Mr. Wright's involvement, it's been continued --
8 or it's still ongoing?

9 A. Yes, ma'am.

10 MS. ZMROCZEK: Thank you. Please answer any questions
11 the government has.

12 CROSS-EXAMINATION

13 BY MR. PEARSON:

14 Q. Good afternoon, Ms. Thomas.

15 A. Good afternoon.

16 Q. How long did you say that you were a client or -- a client
17 of Mr. Wright's at Money Solutions?

18 A. A little over four years.

19 Q. Okay. And that goes up to now.

20 A. Yes.

21 Q. So you're still a client of his.

22 A. Yes.

23 Q. Is he still helping you out?

24 A. He's still helping me.

25 Q. So, and I just want to make sure. So throughout all of

02:04 1 this, throughout the indictment, throughout the search warrant
2 service, throughout all of that, Mr. Wright continues to do
3 this. He continues to help you.

4 A. Yes, sir.

5 Q. Ms. Thomas, has Mr. Wright ever informed you or given you
6 any information about other people sort of disputing this
7 process that he has or saying that, you know, it doesn't work
8 or it's nonsense?

9 A. No, I haven't.

10 Q. He's never told you that.

11 A. No.

12 Q. Anybody at his business, Money Solutions, ever told you
13 that?

14 A. No, sir.

15 MR. PEARSON: Thank you, Ms. Thomas. That's actually
16 all I have for you.

17 THE WITNESS: You're welcome.

18 THE COURT: Any redirect?

19 MS. ZMROCZEK: Nothing further, Your Honor.

20 THE COURT: Any questions for this witness,
21 Mr. Brooker?

22 MR. BROOKER: No questions for this witness, Your
23 Honor.

24 THE COURT: All right. I think they've finished with
25 you, ma'am. You may step down.

02:05 1 THE WITNESS: Thank you.

2 MS. ZMROCZEK: Your Honor, at this time the defense
3 has no more witnesses -- defendant Wright, excuse me.

4 THE COURT: Anything from Defendant Jackson?

5 MR. BROOKER: No, Your Honor. Defense Jackson rests.

6 THE COURT: All right. Very good.

7 All right. Ladies and gentlemen, we've come to the
8 conclusion of all -- or unless there's some rebuttal testimony.

9 MR. PEARSON: No, Your Honor, no rebuttal.

10 THE COURT: -- to the conclusion of all of the
11 evidence. We're at that stage of the trial. So what we have
12 left to do is for me to charge you the law and also for the
13 lawyers to make arguments.

14 My normal practice is to go over what I'm going to
15 address you in your charge before the lawyers present their
16 arguments, but it will -- we'll decide on the charge, they'll
17 make their arguments, and then I will give you the charge on
18 the law.

19 And unfortunately, it's a little bit of a
20 time-consuming process, so I'm going to send you to your jury
21 room right now while we finish up some of the things that we
22 need to do to get on with this last phase of the trial. So
23 thank you. I'm sorry to keep bringing you in and out, but it
24 can't be helped.

25 Do not talk about the case with each other. Don't let

02:07 1 anybody talk about it in front of you.

2 (Jury not present.)

3 THE COURT: All right. As I understand it, what you
4 all would like to do is to have a little time to go over this?

5 MR. PEARSON: Yes, ma'am.

6 THE COURT: Okay.

7 MR. PEARSON: Before we get to that, there is one
8 housekeeping measure that I think this would be a good time to
9 take up.

10 THE COURT: Okay.

11 MR. PEARSON: The government has prepared a summary --
12 a summary exhibit, basically with the names of the individuals
13 located here in these boxes. It also summarizes the amount of
14 payments from, I think, Government's 3, 4, and 5, and provides
15 a reference for if the jury would like to see a particular
16 client file.

17 The government would like to send this back to the
18 jury so that they can request particular files if they wish to
19 review them individually. I believe that the --

20 THE COURT: In lieu of sending all the boxes back
21 there?

22 MS. ZMROCZEK: And Your Honor, that's kind of the
23 discussion that we were having, because my concern is that, you
24 know, they are in evidence and so they should go back, and I
25 understand that they're voluminous and I understand my

02:08 1 objections to hearsay, but since they're in evidence...

2 MR. PEARSON: Well, Your Honor, we are certainly not
3 saying that they can't go, but, you know, time, manner, and
4 place is something that's really up to Your Honor, and that
5 jury room back there is a little small for all the boxes.

6 And what the government is proposing is simply to
7 allow the jury the ability to have us quickly find what they're
8 looking for and give it to them. And we can do that by giving
9 them this summary with the names and where each -- I guess
10 where each of these client files are located.

11 THE COURT: Yeah, I think in my instruction I can tell
12 them those documents are, in fact, in evidence and they're
13 certainly available if anybody wants to have them all brought
14 back at one time. Otherwise, they should ask for them by
15 client file number and the reference that the government has
16 put together.

17 MS. ZMROCZEK: Okay.

18 THE COURT: So that will be my ruling on that.

19 MS. ZMROCZEK: Thank you, Your Honor.

20 THE COURT: Okay. Katherine, have you handed these to
21 them? Okay. I'm going to give you all however long you need
22 to look over those.

23 MR. PEARSON: Okay.

24 THE COURT: And you just let me know when you're ready
25 and I'll come out here and we'll try to resolve any remaining

02:09 1 issues.

2 MR. PEARSON: All right. Thank you, Your Honor.

3 MS. ZMROCZEK: Thank you.

4 (Recess, 2:09 p.m. to 2:39 p.m.)

5 THE COURT: All right. Good afternoon. Please be
6 seated. All right. I understand you all have maybe resolved
7 some of your issues about the charges. I have a few things
8 that are concerning me, but let me hear from you all first.

9 MR. PEARSON: Yes, Your Honor. And I guess it would
10 probably be best just to say things that we -- the larger
11 things that we disagree with before going through each one
12 specifically.

13 Your Honor, while the -- and this is the position of
14 the government. The defense, I think, believes differently.

15 There are several jury instructions that contain
16 repetitive information. It's the position of the government
17 that it is not necessary to charge the jury on definitions of
18 things like scheme or intent multiple times.

19 THE COURT: No, I agree with that. I'm going to do it
20 one time, and that's kind of why I wanted to integrate it all
21 together.

22 MR. PEARSON: Yes.

23 THE COURT: Okay.

24 MR. PEARSON: Well, outside of that, there are no
25 objections to the Court's Jury Instruction No. 1.

02:41

1 THE COURT: Okay.

2 MR. PEARSON: The essential elements of the offense or
3 the information from the indictment.

4 THE COURT: Okay.

5 MR. PEARSON: There are no objections to No. 2.

6 THE COURT: Okay.

7 MR. PEARSON: There is a request --

8 THE COURT: Wait a minute. I'm sorry. I'm trying to
9 make sure I'm with you. So as to Count 1, the elements of
10 Count 1 against Mr. Wright, I was just -- I did notice that we
11 didn't reference which defendant, and I'm going to state which
12 defendant, obviously.

13 MR. PEARSON: All right.

14 THE COURT: All right. So let me get to No. 2.

15 MR. PEARSON: And No. 2 would be Counts 2 and 3 of the
16 indictment.

17 THE COURT: Uh-huh.

18 MR. PEARSON: There is no objection to, I think, the
19 wording of Government's Proposed Jury Instruction No. 2.
20 However, the defendant Ms. Jackson would like to add a couple
21 of sentences from the defense's jury instruction, and the
22 government does not object to the addition of this information.

23 THE COURT: All right. And that was in -- is that
24 the -- which one of those is that?

25 MR. PEARSON: From -- if you are -- Your Honor, if

02:42 1 you're looking at the defendant's request to charge or from
2 yours, page 35, starting on page 35 -- oh, actually 36. It
3 starts on 36.

4 THE COURT: All right. Hold on one second.
5 All right. My 36 is a third element of reasonable doubt.

6 MR. PEARSON: That's right. The government would
7 agree to add the following into -- to incorporate the following
8 into the Court's proposed jury charge on...

9 THE COURT: Counts 2 and 3?

10 MR. PEARSON: Yes, for Counts 2 and 3. It is the
11 sentence that begins, "That nexus requires a relationship in
12 time, causation, or logic with the administrative proceeding."

13 THE COURT: Okay.

14 MR. PEARSON: And the government would also not object
15 to language that "a particular administrative proceeding is not
16 every act carried out by the IRS employees in their course --
17 in the course of their continuous, ubiquitous, and universally
18 known administration of the Tax Code."

19 THE COURT: All right. And it's probably right in
20 front of me, but is it on that page?

21 MR. PEARSON: Yes, Your Honor.

22 THE COURT: All right. How do you --

23 MR. PEARSON: It starts about one, two, three, four,
24 five, six lines down, right after citations omitted.

25 THE COURT: Okay.

02:43 1 MR. PEARSON: And we would strike that word B-Y.

2 THE COURT: Okay.

3 MR. PEARSON: And then "A particular administrative
4 proceeding is not every act carried out by IRS employees during
5 the course of their"...

6 THE COURT: Okay. All right. So you want -- you
7 agree to adding in to --

8 MR. PEARSON: To add that sentence.

9 THE COURT: "That nexus requires a relationship in
10 time, causation, or logic" with the administrative
11 proceeding -- "with the particular administrative proceeding";
12 is that right?

13 MR. PEARSON: That's correct.

14 THE COURT: Okay. All right. Let me get that.
15 All right.

16 MR. PEARSON: And also, the government would not
17 object to the addition of the final sentence of that paragraph,
18 that starting with --

19 MS. ZMROCZEK: (Sneezed.)

20 MR. PEARSON: God bless you.

21 -- starting with "That conduct does not include
22 routine day-to-day work carried out in the ordinary course by
23 the IRS, such as the review of tax returns."

24 THE COURT: Okay. All right. Very good. So does
25 that take care of Counts 2 and 3?

02:44 1 MR. PEARSON: Well, I do believe there is one more
2 sentence that the defense would like to add, that the
3 government would object to.

4 THE COURT: Okay. And what is that?

5 MR. BROOKER: Yes, Your Honor, is that we're still on
6 page 35, and then of course is, is that --

7 THE COURT: Hold on, let me find that, hold on. Hold
8 on.

9 MR. BROOKER: Excuse me, 36, I apologize.

10 THE COURT: I'm on page 36, okay.

11 MR. BROOKER: We're still on page 36. And of course
12 is, that I think in your requested charge, you have the
13 language in there about the government must -- let me see, the
14 government must prove beyond a reasonable doubt that the
15 proceeding was pending at the time the defendant engaged in the
16 obstructive conduct, or at least was then reasonably
17 foreseeable by the defendant. I think you have that language
18 in.

19 THE COURT: All right. What page -- are you talking
20 about -- hold on one second. You're talking about your
21 proposed on page 36, and you're pointing to which part of the
22 charge that I handed you?

23 MR. BROOKER: Yes, the last -- the last sentence.

24 THE COURT: Of what part?

25 MR. BROOKER: Of the last paragraph, 4. The last

02:45 1 sentence of the last paragraph on 36.

2 THE COURT: All right. I thought you were referring
3 to my charge and what was in my charge and how you wanted to
4 change that with what was in your proposal.

5 MR. BROOKER: No. Your charge is fine. It's just
6 that I think your charge comes from *Marinello*, but I think that
7 next sentence is also contained within *Marinello* --

8 THE COURT: All right. Steer me to that next
9 sentence.

10 MR. BROOKER: 36, last paragraph. The next sentence
11 in *Marinello* says: "It is not enough for the government to
12 claim that" the defendant -- "the defendants knew that the IRS
13 may catch on to" -- and of course I added in, "her alleged
14 unlawful scheme eventually."

15 THE COURT: Yeah, I don't even see how that has any
16 applicability to what we heard in here.

17 MR. PEARSON: That's the government's contention.

18 THE COURT: That's just going to confuse that, because
19 there was no testimony about when the -- I mean, there was no
20 confusion about when the IRS caught on to this.

21 MR. BROOKER: That's not what the purpose of it is,
22 Your Honor.

23 THE COURT: All right. Tell me what it is.

24 MR. BROOKER: The purpose of that is, is that in one
25 sentence, the Court basically talks about that the -- that --

02:46 1 the Court explains is, that the defendant must know about
2 the -- know about the administrative proceeding or either has
3 to be able to reasonably foresee the administrative proceeding.

4 THE COURT: Right. It's on my -- it says
5 "administrative proceeding was pending at the time the
6 defendant engaged in the obstructive conduct, or at least was
7 reasonably foreseeable by the defendant."

8 MR. BROOKER: The next paragraph, the purpose of that
9 next sentence is to give a further explanation of reasonably
10 foreseeable, and it says is, is that -- and it says that --

11 THE COURT: A further definition of reasonably
12 foreseeable?

13 MR. BROOKER: Yeah, it's explaining -- it's explaining
14 exactly what is not reasonably foreseeable. Basically it is --
15 otherwise --

16 THE COURT: That may be true, but they're using that
17 example in the case about the IRS is catching on to a scheme
18 and how that might make a difference. I don't see how that
19 plays into this case.

20 MR. BROOKER: No, what they're saying is -- what
21 they're saying about reasonably foreseeable, they're limiting
22 the scope of reasonably foreseeable.

23 THE COURT: Yes, yes, and they're limiting it with
24 some language that probably applied during that particular
25 case. I don't see how that applies --

02:48 1 MR. BROOKER: And I think what they're trying to say
2 is, is that -- that it's not enough for the government to argue
3 that reasonably foreseeable means that, hey, the government
4 would eventually catch on, because otherwise the government --
5 otherwise, if the government said -- and I think what they're
6 trying to say is, is that if the government wants to say that,
7 hey, it was reasonably foreseeable, the government would say,
8 well, she had to have known eventually that she was going to
9 get caught. Therefore, it was reasonably foreseeable.

10 And what the court is saying is that that is not a
11 proper definition of reasonably foreseeable.

12 THE COURT: I mean, this case, she had -- she was told
13 what her tax liability was. I mean, so I mean --

14 MR. PEARSON: Your Honor, at this point what I would
15 say is it does not appear -- it's the government's position
16 this charge is not necessary. If something comes up in
17 argument and it becomes necessary, we could revisit it, but
18 there's nothing in the -- there's nothing in the evidence now
19 that would even touch on what Mr. Brooker is talking about.

20 THE COURT: Yeah, I agree with you. But as you say,
21 when we get to arguments, if there's some way to put this
22 together, if there's some inference that would arise from the
23 evidence that you point to that that would somehow impact their
24 determination on whether or not this was foreseeable to her,
25 like Mr. Pearson said, we'll revisit it.

02:49 1 MR. BROOKER: I can tell you one way, Your Honor,
2 where we might be able to shorten the language that might make
3 it more sense. So instead of putting that whole paragraph in
4 there, and let me -- probably at the end of the paragraph where
5 it says "It is not enough for the government to claim that the
6 defendant knew," I think you could probably leave that out and
7 basically say something is, is that -- that -- something to the
8 effect that the fact that the government -- the fact that the
9 government may eventually -- the fact that the government may
10 eventually catch on to the scheme, you know, does not
11 constitute reasonably foreseeable.

12 THE COURT: That may be true, but that doesn't have
13 any application to the facts that we've got in this case, and I
14 think that might be confusing. It's almost like you're talking
15 about a different scheme or something.

16 MR. BROOKER: Your Honor, I --

17 MS. ZMROCZEK: If I may weigh in, Your Honor, my
18 concern is that that may bleed over into our charge --
19 understanding of what's required in our charge, and we would
20 object to that.

21 MR. BROOKER: Can I make this one statement for the
22 record and then I'm going to sit down and shut up and allow you
23 to make your decision?

24 THE COURT: Yes.

25 MR. BROOKER: The reason why it is relevant, Your

02:50 1 Honor is, is that for the very reason -- for the very reason
2 when we argued our Rule 29 motion for judgment of acquittal,
3 and of course is, is that one of the arguments -- one of the
4 arguments that the government made counter to that was, is that
5 the fact that she asked for an attorney back in 2013, you know,
6 that a jury might interpret that as being reasonably
7 foreseeable that she knew that an investigation was pending, it
8 is relevant. They need to know what reasonably foreseeable is.

9 THE COURT: I know, but my point is that is not going
10 to help them, and so we will -- I will -- right now, my ruling
11 is that's not going to be added to that, but after argument, if
12 I could be persuaded differently, I'll be happy to hear you.

13 Okay. So that -- this is all going to go into my
14 charge on my Instruction No. 2. Okay.

15 MR. PEARSON: Your Honor, there are no objections to
16 Proposed No. 3.

17 THE COURT: Okay.

18 MR. PEARSON: There are no objections to Proposed
19 Instruction No. 4.

20 THE COURT: Okay.

21 MR. PEARSON: No objection to No. 5. I suppose I
22 should say what they are. No. 5, presumption of innocence.

23 No objection to No. 6, multiple counts.

24 No objection to 7, proof may be disjunctive.

25 No objection to 8, evidence.

02:52

1 THE COURT: Okay.

2 MR. PEARSON: No objection to 9, indictment.

3 THE COURT: Okay.

4 MR. PEARSON: No objection to 10, credibility.

5 No objection to 11, credibility-law enforcement.

6 No objections to 12, admissions by a defendant.

7 No objection to 13, voluntary confession.

8 Your Honor, there is an objection by Defendant Wright
9 to Proposed 14, literally true.

10 THE COURT: All right. Let's see. Let me hear your
11 objection to that.

12 MS. ZMROCZEK: Oh, literally true. So, Your Honor,
13 the government put this objection [sic] in, saying that the
14 defense -- the defendant has raised the defense that the
15 allegedly false statement was true. So here's my problem with
16 this language. So as I understand -- I didn't have an
17 objection with it as long as it only applied to the tax count,
18 so just Count 4.

19 THE COURT: Okay.

20 MS. ZMROCZEK: My concern is that this is going to
21 apply to Count 1, and the government believes that it should
22 apply to Count 1 and I think that there would be some confusion
23 in there.

24 I understand what the testimony -- what the arguments
25 were outside of the -- outside of the presence of the jury

02:54 1 regarding the tax statements, so I don't know that we
2 necessarily argue -- I don't even think that applies in this
3 case, because we didn't raise a defense that he actually did
4 pay a Schedule C, because we couldn't authenticate it, so none
5 of that is in front of the jury, so I don't know -- I don't
6 think that they would need that.

7 Now, what he did raise is that his beliefs, that he
8 believes what he believes to be true. I think that that's
9 different than what this charge is saying, if that makes sense.

10 THE COURT: All right. Well, I have to say it
11 confused me a little bit because you're talking about the
12 alleged false tax return? What are you talking about?

13 MR. PEARSON: For purposes of this argument, I don't
14 think the tax -- I don't think the tax -- I don't think it
15 applies to the tax charge because they haven't said that. But
16 they have raised the defense that what he -- that what
17 Mr. Wright told the clients at Money Solutions was literally
18 true, that they literally could use their -- use the account on
19 the back of their Social Security card to have access to cancel
20 debt and various and sundry other things.

21 It is the position of the government that that has
22 been the position of the defense since the beginning of this
23 trial and thus, we would think that the literally true charge
24 would be applicable.

25 THE COURT: Okay. I mean, I understand what your

02:55 1 concern is, but what if I changed it to read that the defendant
2 has raised the defense that the alleged false statements made
3 to his clients were true?

4 MS. ZMROCZEK: See, but I don't know that he did that.
5 'Cause that's why I specifically asked each of the witnesses,
6 you know, there was no guarantee, did he ever guarantee you
7 anything, did he ever promise you anything?

8 THE COURT: Right. But I don't think the government
9 is relying on an action based on those guarantees. It's just
10 like it's explained further in the charge, it's by
11 misstatements and it's a lot by just omissions of material
12 statements. So I think it would be -- if it's not applicable
13 to the tax --

14 MR. PEARSON: Well, we could put it in the jury -- we
15 could put it at the -- inside the count -- inside Count 1's
16 jury charge.

17 THE COURT: Count 1? Okay. All right. I think
18 that's what we'll do. We'll find a way to move it into
19 Count 1.

20 MS. ZMROCZEK: And I would just --

21 THE COURT: Object.

22 MS. ZMROCZEK: -- make sure that we noted our
23 objection for the record on that.

24 THE COURT: Okay. All right.

25 MR. PEARSON: Your Honor, there is no objection to

02:56 1 instruction 15, tapes and transcripts.

2 THE COURT: Okay.

3 MR. PEARSON: No objection to 16, investigative
4 techniques.

5 No objection to 17, on or about.

6 No objection to 18, deliberations.

7 No objection to 19, punishment.

8 And then -- and Your Honor, I think at this point we
9 move to the defendant's requested charges. There was one that
10 the defense brought up that the government does not object to
11 and we would -- I don't think any of the parties would object
12 to the standard jury charge on multiple defendants.

13 MS. ZMROCZEK: I forgot to add that in, Your Honor,
14 but I believe that there's a --

15 THE COURT: Are you telling me you did not submit one?

16 MS. ZMROCZEK: I didn't submit one.

17 THE COURT: All right. So you want a standard charge
18 on multiple defendants.

19 MR. PEARSON: Multiple defendants.

20 MS. ZMROCZEK: Multiple defendants.

21 THE COURT: Okay.

22 MS. ZMROCZEK: And I believe, Your Honor, there's a
23 standard charge on...

24 THE COURT: Multiple counts, we have in here. We
25 could put it right after that.

02:57

1 MR. PEARSON: Yeah, that would be fine.

2 THE COURT: Okay.

3 MS. ZMROCZEK: And Your Honor, and I believe that this
4 is a standard charge, and I can't remember the title of it, but
5 that the jury can't base their verdict on emotion or sympathy.
6 And the reason I bring that up is because several witnesses got
7 up and cried about losing their homes.

8 THE COURT: I know. I just wish you would submit a
9 charge so that I could try to work it into my charge.

10 All right. So let me -- we're going to add in my draft, under
11 the charge about multiple counts, we're going to add a standard
12 charge on multiple defendants.

13 And then you want a no sympathy charge.

14 MS. ZMROCZEK: Right.

15 THE COURT: All right. Mr. Pearson, do you have any
16 problem with that?

17 MR. PEARSON: No, Your Honor.

18 THE COURT: All right. So we'll find an appropriate
19 place to put that.

20 MS. ZMROCZEK: Sorry, Your Honor.

21 THE COURT: Okay.

22 MS. ZMROCZEK: And then we withdraw the mere presence.

23 THE COURT: All right. Hold on one second. You
24 withdraw your request for a charge on mere presence.

25 MS. ZMROCZEK: Yes.

02:58 1 THE COURT: Good, because I had a big question mark on
2 that one.

3 MS. ZMROCZEK: Yeah.

4 MR. PEARSON: Before we get there, there was no
5 objection to the summary chart charge.

6 THE COURT: All right. And I was thinking that I
7 might move that -- I think I have a good place to put that, but
8 anyway, we'll do that, okay?

9 MS. ZMROCZEK: And then I know those three
10 definitions, that you already talked about incorporating them
11 into --

12 THE COURT: All right. Well, here is the thing. In
13 my standard -- in the proposed charge there is some definition
14 of willfulness, but I'm also asked for just sort of a
15 general -- and I don't know about this -- charge to establish
16 that the defendants acted knowingly, the government must prove
17 the defendants acted blah, blah, blah. Now, where exactly -- I
18 mean, what's your position on that?

19 MR. PEARSON: Well, Your Honor, it is the government's
20 position that this is already in there in the other jury
21 charges. This is one of the things that we were talking about
22 with the repetition going on with some of the definitions.

23 THE COURT: Right. I was just -- when I looked
24 through there, I was trying to find where in here there was
25 some definition or requirement that it was knowing, as opposed

02:59 1 to willful, I think is what was --

2 MS. ZMROCZEK: Right. And I think we'll withdraw the
3 "knowing."

4 THE COURT: Okay.

5 MS. ZMROCZEK: I think it was the specific intent --
6 the specific intent and the willfulness that we were focused
7 on.

8 THE COURT: All right. So you'll withdraw "knowingly"
9 defined and we've withdrawn "mere presence." What about
10 "intentionally" defined?

11 MS. ZMROCZEK: And I think as long as it's in the
12 charge, incorporated in the charge, because this is obviously a
13 specific intent crime.

14 MR. PEARSON: I believe these are all laid out. This
15 is laid out in the specific counts that Your Honor is going to
16 give a charge on. I don't think we need to do it again.

17 THE COURT: Yeah, that's what I'm worried about, is
18 telling them here's what you've got to do and then giving them
19 another definition.

20 All right. Well, what I'm going to do on that is I'm
21 going to look through here and see if it's necessary to add
22 that in to any of the specific charges on the counts, okay?

23 MS. ZMROCZEK: Okay.

24 THE COURT: And before I actually charge this to the
25 jury, once it's all put together, I'll give you another chance

03:00 1 to see if you think -- because there could be something wrong
2 with sort of the flow of it after we try to cram all this stuff
3 in here.

4 Okay. All right. Now, "willfully," I think that's
5 already --

6 MS. ZMROCZEK: I think that one was in there.

7 THE COURT: That one's in.

8 MS. ZMROCZEK: Yes.

9 THE COURT: So will you withdraw your request for an
10 additional one?

11 MS. ZMROCZEK: I do, yes.

12 THE COURT: Okay. Good faith defense. I think there
13 is -- that's in there too.

14 MR. PEARSON: Your Honor, the jury charges do touch on
15 good faith. Just to put it before the Court, the Fourth
16 Circuit has repeatedly said a proper instruction on intent to
17 defraud means that you don't necessarily -- that you don't have
18 to give an instruction on good faith.

19 However, to make a clean record, the government does
20 not object to a good faith instruction to be placed in
21 Counts 1 -- to be placed in Count 1?

22 MS. ZMROCZEK: In Count 1, that's it.

23 MR. PEARSON: Yeah, to be placed in Count 1.

24 Your Honor, we do believe that the defense's
25 instruction is too long.

03:02

1 THE COURT: Yeah.

2 MR. PEARSON: I think what we would say is --

3 THE COURT: Maybe the first part of that.

4 MS. ZMROCZEK: Right.

5 THE COURT: Okay. Now here is another thing. 7201,
6 is that the right reference to the statute? I'm not sure that
7 we have that.

8 MS. ZMROCZEK: It might be 76.

9 MR. PEARSON: Your Honor, it's actually --

10 THE COURT: I have 7206.

11 MS. ZMROCZEK: Yeah.

12 THE COURT: Am I right to change that to 7206?

13 MS. ZMROCZEK: Yeah. Sorry, Your Honor.

14 THE COURT: We'll double-check it. Okay.

15 MR. PEARSON: And we can add that.

16 Now, there's a lot of repetition. We don't need to go
17 over the elements again. Also, it talks about willfulness
18 again.

19 THE COURT: All right. Where are you now?

20 MR. PEARSON: The good faith defense instruction.

21 THE COURT: Okay. All right. So how do you want --
22 you agreed to something else.23 MR. PEARSON: Yes. We would agree -- this is the one,
24 two, three, four, five, sixth -- seventh sentence down. It
25 starts with "A belief in good faith that one has complied with

03:02 1 the tax laws negates willfulness, and is therefore a defense,
2 even if the belief is unreasonable."

3 MS. ZMROCZEK: And if we can take that and put it at
4 the bottom of Count 1, then we're okay with that.

5 THE COURT: Okay. Yeah, because right now it's
6 referring to Count 4.

7 MS. ZMROCZEK: Right, right.

8 THE COURT: Right, okay.

9 MR. PEARSON: We would -- and I think both parties
10 also agree that in putting that sentence about good faith, the
11 jury must also be instructed that good faith -- a good faith
12 misunderstanding is distinct from a -- from disagreement.

13 THE COURT: That's in already.

14 MR. PEARSON: Yes.

15 MS. ZMROCZEK: That's in.

16 THE COURT: All right. Okay. But you still want it
17 to end that way.

18 MR. PEARSON: Yes, Your Honor.

19 THE COURT: Okay.

20 MR. BROOKER: Can I ask a question, Your Honor?

21 THE COURT: Just one second.

22 (Pause.)

23 THE COURT: All right.

24 MR. BROOKER: The problem with that is, is that the
25 good faith defense -- is the good faith defense something

03:03 1 that's specifically limited to Counts 1 and 4 of the indictment
2 or is that a general defense that would also apply to Counts 2
3 and 3? And if it is a general defense that would apply to
4 Counts 2 and 3, and if you simply put it in there as it relates
5 to one particular count -- one particular count, then of course
6 you give the jury the impression that good faith only applies
7 to this particular count and no other. So that's my question.

8 Now, is it a general defense that could apply beyond
9 just Count 1?

10 THE COURT: I don't know. That's what you're supposed
11 to have studied up on and prepared and submitted to me. I
12 don't --

13 MR. PEARSON: Your Honor, the government would not
14 object to just making that a separate instruction. I believe
15 in good faith that one has complied with the tax laws negates
16 willfulness and is therefore a defense even if the belief is
17 unreasonable. A good faith misunderstanding is distinct from
18 a -- from a disagreement with the -- excuse me.

19 THE COURT: Okay. But the problem is that language is
20 in the Count 1 part. And you want to move that --

21 MR. PEARSON: Well, actually --

22 THE COURT: You don't mind me just saying it again
23 or -- so you want a separate instruction that would apply to
24 all counts in the general instructions part that says, A belief
25 in good faith that one has complied with the tax laws negates

03:05 1 willfulness. See, now all of a sudden we're talking about
2 willfulness. And is therefore a defense even if the belief is
3 unreasonable.

4 MR. BROOKER: Correct.

5 MS. ZMROCZEK: And we're okay with that.

6 THE COURT: Are you all right with that, Mr. Pearson?

7 MR. PEARSON: That's fine.

8 THE COURT: Okay. So we'll just do a separate good
9 faith statement. Okay.

10 MR. PEARSON: Your Honor, I believe the next one is
11 puffing. The government does not object to a puffing
12 instruction. However, we think the puffing -- and there's no
13 objection to this -- we believe that it should end after the
14 first sentence.

15 MS. ZMROCZEK: After -- yeah, so line 4 where it
16 says --

17 THE COURT: Well, that I like.

18 MS. ZMROCZEK: "The product does not possess," end,
19 yes, we're okay with that.

20 THE COURT: Just the first sentence.

21 MR. PEARSON: Yes, Your Honor.

22 MS. ZMROCZEK: Yes, Your Honor.

23 THE COURT: Excellent.

24 MS. ZMROCZEK: We withdraw the next, page 26 and 27
25 and 28.

03:06

1 THE COURT: Withdraw, okay.

2 MS. ZMROCZEK: I believe there's no objection to 29,
3 which is the informant.

4 MR. PEARSON: No objection.

5 THE COURT: All right. Hold on one second.
6 All right. Okay.

7 MS. ZMROCZEK: 30 was not applicable, so we would
8 withdraw that.

9 THE COURT: Yeah, that's another one of my big
10 question marks.

11 MS. ZMROCZEK: I thought it was coming out, but then
12 it didn't.

13 THE COURT: All right.

14 MS. ZMROCZEK: And then 31 is duplicative. It's
15 already in your first, so we'd take that one out.

16 THE COURT: Yes.

17 MS. ZMROCZEK: 32 is not, so if you want to add that
18 to the bottom of your duty to deliberate charge that you
19 already have.

20 THE COURT: Okay.

21 MS. ZMROCZEK: And I believe there was no objection to
22 communicating with the Court. No objection --

23 THE COURT: Yeah, we probably didn't put this in, but
24 this is all in my normal.

25 MS. ZMROCZEK: Yeah, sorry.

03:07 1 THE COURT: My shell that doesn't have any law in it,
2 okay?

3 MS. ZMROCZEK: Yeah, 30, and transcripts was fine.

4 THE COURT: Okay. And though we didn't admit any
5 transcripts, so...

6 MS. ZMROCZEK: No, no, so this is a different
7 transcript charge. It says if they want to rehear testimony
8 basically. They should probably rename that charge.

9 THE COURT: Oh, okay, okay. All right. And then we
10 have...

11 MR. PEARSON: We've already actually discussed this
12 one. This was the language to be placed into the jury
13 instructions on Count 2 and 3.

14 THE COURT: All right. Because I'm looking at
15 Jackson's proposed jury charge is a requested charge 1 on
16 page 35.

17 MS. ZMROCZEK: And then if you flipped it to page 36,
18 that's where you all made those --

19 MR. PEARSON: Yeah, and I don't want to speak for the
20 defense, but I don't think we need another entire charge. I
21 think our discussion was just to add that language to Your
22 Honor's charge and then he would...

23 THE COURT: All right. I'm confused. I don't
24 remember talking about this particular charge. Oh, we did add
25 a couple of pieces from -- okay, okay, you're right, you're

03:08 1 right, okay. I got it, I got it. Okay.

2 MR. PEARSON: And then, Your Honor, finally, there's
3 the Jackson's Request No. 2, the good faith reliance on
4 professional advice. Your Honor, the government does not have
5 an objection to -- does not have an objection to this.

6 However, based on Your Honor's previous ruling, it
7 seems to me -- or Your Honor's -- or the previous objection,
8 that maybe just putting this good faith reliance on
9 professional advice would address Mr. Brooker's concern. I'll
10 certainly let him speak to that.

11 THE COURT: So I guess the question is, do you want a
12 short separate good faith charge or are you going to insist on
13 this lengthy one?

14 MR. BROOKER: This one, because, Your Honor, this is
15 separate to -- this is a little bit distinct from good faith
16 reliance. This is good faith reliance on professional advice,
17 which is slightly different from the other one.

18 THE COURT: All right. Well, I'm not sure about that.
19 I mean, it seems to me that a reliance on professional advice
20 charge might be appropriate in this case because Ms. Jackson, I
21 think, has kind of strongly suggested that she believed this
22 might work and she trusted her advisor, at least to a point, it
23 seems, so -- but this is awfully long.

24 Mr. Pearson?

25 MR. PEARSON: Your Honor, again, the government

03:10 1 doesn't object to it. What we could say is...

2 THE COURT: I think -- I haven't -- since we don't
3 have a case citation for this, which is something that I think
4 I asked for, my -- and I'll have to check it now, since that
5 hasn't been done. The mere -- I think perhaps we could end it
6 at the end of the explanation of the second element and not
7 repeat the in short part.

8 MR. PEARSON: Your Honor, the government certainly
9 would not object to that.

10 THE COURT: Do you have a problem with that,
11 Mr. Brooker?

12 MR. BROOKER: If you can indulge me for just a second,
13 Your Honor. Your Honor, there is a citation to it, and of
14 course is, is that at least in my requested charge there is.

15 THE COURT: Oh, there was? Okay. I apologize. I
16 apologize. All right. Well, then would you be agreeable to
17 stating that it's a defense and giving the two elements?

18 MR. BROOKER: I'm sorry, Your Honor, repeat? I don't
19 understand.

20 THE COURT: Okay. In your request to charge No. 2 --

21 MR. BROOKER: Uh-huh.

22 THE COURT: -- you have -- it began, "You have heard
23 evidence," and there's an explanation of that all in two
24 sentences, and then the third sentence says, "The reliance
25 defense has two essential elements. First, the defendant must

03:11 1 fully disclose all pertinent facts to an expert, and second,
2 the defendant must rely in good faith on the advice of the
3 expert."

4 And my suggestion was to stop it right there.

5 MR. BROOKER: Okay. If you can indulge me for just a
6 second, Your Honor, let me make sure that the part that's
7 being -- or that's being proposed to be removed, make sure that
8 I don't think that it's necessary for some reason.

9 (Pause.)

10 MR. BROOKER: I think it's necessary, Your Honor, and
11 like I said is, is that it's only a couple more sentences. It
12 takes less than 30 seconds to read. Of course, I'll leave it
13 up to you, Your Honor, if it's -- you know, if it's so -- but
14 just, I would -- you know, I would just note my objection for
15 the record, but I think it's necessary.

16 THE COURT: Okay. All right. Does that take care of
17 everything?

18 MR. PEARSON: Your Honor, I do believe that is all the
19 jury charges.

20 THE COURT: All right. Then what I'm going to do is
21 I'm going to give you...

22 (Off-the-record discussion.)

23 THE COURT: All right. While we work on putting that
24 together, I'd like to go ahead and get started with closing
25 arguments. How long do you want for closing arguments?

03:13 1 MR. PEARSON: You know, the government would say
2 probably 20 minutes first, and then 15 for its argument.

3 THE COURT: Okay. All right.

4 MS. ZMROCZEK: Maybe two hours -- I'm kidding, Your
5 Honor, I just wanted to see your face.

6 THE COURT: I'm really glad --

7 MS. ZMROCZEK: I think about 15 to 20 minutes.

8 THE COURT: Okay. And Mr. Brooker, can you do yours
9 in 15 to 20 minutes?

10 MR. BROOKER: No. Honestly I can't.

11 THE COURT: You know what? You know what? I think I
12 believe you.

13 MR. BROOKER: I hate to say that, Your Honor. Well, I
14 don't want to say anything that is inaccurate and, you know, I
15 don't want to tell you I can do it in 15 to 20 minutes and then
16 of course I'm running over, but to be absolutely honestly, I am
17 almost certain that I can't.

18 THE COURT: All right. Well, tell me how long you
19 want.

20 MR. BROOKER: If I can at least have at least 25
21 minutes, I'm pretty sure I can squeeze it in in 25.

22 THE COURT: 25 minutes.

23 MR. BROOKER: Yeah.

24 THE COURT: Now, there are only, I think, two counts.

25 MR. PEARSON: They're the same.

03:14 1 THE COURT: And they're the same and we have different
2 amounts in the checks, so I think you ought to be able to
3 easily get it done in 25 minutes, okay? So let's make every
4 effort to do that.

5 MS. ZMROCZEK: Will we have the timer?

6 COURTROOM DEPUTY: No, it doesn't work.

7 THE COURT: Oh, it doesn't work? The upgrade to this
8 courtroom has been impressive. We didn't have a clock. We
9 have a clock now. We don't have a timer.

10 Okay. All right. So you all, I think we'll take just
11 a five-minute break before we bring the jury in. I'll be right
12 back, okay.

13 The summary exhibit, has it been moved in?

14 MR. PEARSON: It has not.

15 MS. ZMROCZEK: And we have no objection.

16 THE COURT: Okay. Let's go ahead and do that.
17 All right. I'll be right back.

18 COURTROOM DEPUTY: What number is that?

19 MR. PEARSON: Exhibit No. 32.

20 (Recess, 3:16 p.m. to 3:22 p.m.)

21 THE COURT: Be seated. Anything?

22 MR. PEARSON: No, Your Honor.

23 THE COURT: All right. Let's bring them in. Thank
24 you.

25 (Jury Present.)

03:23 1 THE COURT: All right. Ladies and gentlemen, we're
2 now at the stage of the trial where we hear from the lawyers
3 for their closing arguments and we will begin with arguments
4 from the government.

5 MR. PEARSON: Thank you, Your Honor.

6 Let me just -- members of the jury: First, I'd like
7 to say thank you for your time and attention to this matter.
8 And I understand that jury service is not something that people
9 always want to sign up for. I want to let you guys know that
10 we are very glad -- all the parties are very glad of your time
11 and your attention to this matter. I will attempt to keep my
12 argument as concise as possible.

13 In just a few moments, at the close of these closing
14 arguments -- and I'll talk to you first about the law and then
15 the defendants will have their attorneys talk to you about the
16 case, and then you will hear from me again at the end. And
17 after that, the judge is going to read the jury instructions to
18 you, about what the case is about and how to go about your
19 deliberations. And I'm going to try to summarize those very
20 quickly to point out some particular pieces of evidence to you,
21 but if anything that I say conflicts with anything the judge
22 tells you, the judge controls what your deliberations are
23 about.

24 Count 1 of the indictment charges Ronald Wright with
25 conspiracy to commit mail and wire fraud, and what that means,

03:25 1 and what the government must prove beyond a reasonable doubt,
2 is that, first, Mr. Wright devised or attempted to devise a
3 scheme to defraud or to obtain money by means of false or
4 fraudulent pretenses; and second, that for the purpose of
5 executing the attempt -- excuse me, second, for the purpose of
6 executing or attempting to execute the scheme, the defendant
7 did in fact use the mail or the wire -- used mail or a wire.

8 In addition to that, the government must show that a
9 conspiracy existed, in that he and another person did something
10 which federal law -- conspired to do something which federal
11 law prohibits; in this case, the mail or wire fraud.

12 Second, that the defendant knew about the conspiracy
13 and joined the conspiracy.

14 There has been multiple iterations of evidence that
15 showed that the defendant, Ronald Wright, committed mail and
16 wire fraud. Specifically, Mr. Wright told customers of Money
17 Solutions that he had a system that could eliminate their debts
18 and mortgage. He knew this to be a lie. He told them that
19 anyway so that he could get money from the customers.

20 In addition to that, he conspired with his employees,
21 Kendra Jackson, Linda Jackson, and the other individuals that
22 you heard from, in order to continue to put forth these
23 falsehoods to his clients that ultimately ended in them being
24 defrauded.

25 Now, ladies and gentlemen of the jury, the government

03:27 1 put forth multiple boxes of evidence to show you these things,
2 and you will have the ability to go through each and every one
3 of these boxes at your leisure, should you desire to do so,
4 during your deliberations.

5 And what you will find is that Mr. Wright continued to
6 do and say things that he knew to be wrong, he told people
7 things that he knew to be untrue, and he did so with a very
8 specific purpose of separating them from their money.

9 We know he was involved in a conspiracy and willfully
10 joined it because he is the person who started Money Solutions.
11 He is the person who hired the employees and told them about
12 the system. And if you will think back to the testimony that
13 we had from the stand, both Kendra and Linda Jackson talk
14 about, well, I started there and then I figured out that this
15 process didn't work and then I figured out that Mr. Wright
16 continued to tell people that it did, and then I helped him do
17 it and I kept -- I stayed there at Money Solutions, committing
18 this fraud, until the IRS and the FBI showed up with a search
19 warrant.

20 We know that Mr. Wright used the mail and the wires in
21 order to commit this fraud, as the government has placed into
22 evidence several mailing receipts and several telephone --
23 recorded telephone conversations that Mr. Wright had with these
24 customers in order to extend that scheme.

25 Ladies and gentlemen of the jury, Count 2 and 3 of the

03:29 1 indictment are very similar. They both charge the defendant,
2 Joretta Jackson, with the interference with the administration
3 of tax laws.

4 What the government will have to prove is, first, that
5 the defendant obstructed, impeded, or endeavored to obstruct or
6 impede the administration of the Internal Revenue Code; and
7 second, that the defendant did so corruptly.

8 The term "corruptly" will be defined as the intent to
9 secure an unlawful benefit for one's self, but the judge will
10 also tell you that the acts, in and of themselves, need not be
11 illegal, that the crime is the intent to impede the IRS. And
12 what we have -- what we have seen during the course of this
13 trial from Government's Exhibit No. 31 are all of the contacts
14 that Joretta Jackson had with the IRS concerning her tax --
15 concerning her taxes.

16 The government put forth witnesses that testified that
17 Joretta Jackson frequently contacted the IRS and frequently
18 made claims that, uhhh, there was fraud involved with my
19 original term, uhhh, I might be the victim of identity theft,
20 uhhh, I got some stuff going on with insurance and I need to
21 submit some various documents. All of these things she did to
22 continuously try to interfere with the IRS's ability to assess
23 the proper amount of taxes.

24 And in addition to that, while all of this is going
25 on, the IRS discovers that Joretta Jackson has hundreds of

03:31 1 thousands of dollars moving in and out of her accounts. And
2 they go and question her about that, and while she participates
3 in an interview, while the investigation is going on, she says,
4 you know what? I think I need to get a lawyer. They allow her
5 to get a lawyer.

6 She continues to contact the IRS about her status.
7 She continues to make unsubstantiated and unfounded claims.
8 And then she goes to Ronald Wright.

9 Except when she goes to Ronald Wright, even Ronald
10 Wright won't do what Joretta Jackson wants him to do. Even
11 Ronald Wright says, What you're asking for is a bridge too far,
12 even for me. And what does Joretta Jackson do? She goes
13 around Mr. Wright, talks to her church friend, and says, You
14 think you could go in there and get me a couple of those checks
15 so I can take them down to the IRS to pay my debt off?

16 And I'm going to use a statement that my mother says
17 all the time. Now, I don't mean this ugly, but we heard from
18 Kendra Jackson on the stand. And Kendra Jackson, while a
19 coconspirator, is not a mastermind, but she wanted to help the
20 person that she said was kind of like a mother to her, so she
21 was able -- so Ms. Jackson was able to talk Kendra Jackson into
22 creating these false checks for her so she could take them to
23 the IRS. And in doing so, she attempted to interfere with the
24 administration of tax laws.

25 MR. BROOKER: May we approach, Your Honor?

03:33

1 THE COURT: No. Let's let -- all right.

2 (Sidebar Conference:)

3 THE COURT: I don't like to interrupt somebody's
4 argument.

5 MR. BROOKER: I don't like to interrupt somebody too,
6 Your Honor, but one of the things he can't do is
7 mischaracterize the evidence.

8 THE COURT: Well, he hasn't. I was right here.
9 There's nothing wrong at all with what he said. Now, let's not
10 mess up the flow of his argument.

11 MR. BROOKER: Kendra Johnson never testified that
12 Ms. Jackson came to her and says, could you create some checks
13 for me so I can go take them over to the Internal Revenue
14 Service.

15 THE COURT: I can't tell a difference from what we've
16 heard here from the stand.

17 MR. BROOKER: Okay. As long as I'm on the record,
18 Your Honor.

19 (Before the Jury.)

20 MR. PEARSON: And so Joretta Jackson does this not
21 once, but twice, goes down to the IRS and gives them checks
22 that she knows are made using a closed account of hers from
23 years ago. But she would have you believe that she thought it
24 was legitimate, legitimate just like her involvement with the
25 scam from people in New York, where she was collecting money

03:34 1 from individuals and passing them along to someone somewhere
2 else in the hopes that she was going to get -- or she was going
3 to secure vast refunds and vast amounts of money from some, I
4 believe, royalty somewhere in Africa.

5 Now for the indictment. It charges the defendant
6 Ronald Wright with filing a false tax return. What the
7 government will have to show and prove beyond a reasonable
8 doubt is that the defendant made or caused to be made a signed
9 tax return for the year in question containing a written
10 declaration; second, that the tax return was made under the
11 penalties of perjury; and third, that the defendant did not
12 believe the return to be true and correct as to every material
13 matter; and fourth, that the defendant acted willfully.

14 You will have a copy of the defendant's tax return
15 from 2014, and in this official certification of tax record,
16 you will see that there is a certification signed by
17 Mr. Wright, using his, as was explained from the stand,
18 authenticated personal identification number where he claims
19 that the only income he and his wife made was from the W-2
20 reported from the State of South Carolina. There is no
21 Schedule C for his business income. And you will see from
22 these receipt books that he certainly had income in 2014 that
23 he did not claim.

24 Ladies and gentlemen of the jury, again, I appreciate
25 your time. I've got one more argument to make after the close

03:36 1 of these two. Again, thank you for your time.

2 MS. ZMROCZEK: May it please the Court.

3 THE COURT: All right.

4 MS. ZMROCZEK: Good afternoon. I'm not going to get
5 too close so I will not infect you. I want to also thank you
6 for your time this week.

7 Okay. My client, Mr. Wright, Mr. Ronald Wright, you
8 got to hear from him today, and I was thinking last night of
9 these radical movements, and I told you when I stood up here in
10 the beginning, you know, that people have ideas that we don't
11 always agree with, and actually, that goes all the way back to
12 how our country was founded to begin with. And if you Google
13 the internet, you will learn about these sovereign citizens.

14 And you heard the FBI talk about how they had these
15 long problems, because why? They're clogging up the courts. I
16 specifically asked Agent Davis, I specifically asked Agent
17 Desmond, What's he doing? He's filing paperwork and that's
18 clogging up the courts. And I believe Agent Davis even agreed
19 with me, it's annoying. Just like my sister who sat behind me
20 and kicked my chair continuously, it's annoying.

21 Mr. Wright testified about his -- the nature of his
22 beliefs, and the judge is going to give you an instruction on a
23 good faith defense. A belief in a good faith that one has
24 complied with the tax laws negates willfulness and is therefore
25 a defense.

03:38

1 They -- this whole case, they want you to find
2 Mr. Wright crazy or just evil, an evil intent to steal money
3 from people. Well, you heard these people: They paid for a
4 service, and we have 32 boxes of documents to show that he was
5 generating services. Asked every single witness up here about
6 their guarantees. There are none. I made sure to put in the
7 website -- and I want you all to look at this closely -- more
8 closely when you get there, because you'll see what they --
9 what the advertisement or what he offered was, and pay close
10 attention to the spelling and the promises that are made here.

11 And these people, it is unfortunate their situations,
12 but Mr. Wright did not cause their situations. Mr. Wright is a
13 person who has been trying to help people, and if the
14 government truly believed that what he was doing, taking,
15 stealing people's money, as they like to say, for no reason,
16 that they knew back in April when they started paying the only
17 criminal convicted person that we heard up here, then why
18 didn't they stop it then? Why didn't they arrest him in
19 November when they raided his office and took all his things?

20 One of the jobs of a jury is to individually determine
21 if they've met all of their burdens beyond a reasonable doubt.
22 All you have to do is individually look at the evidence.
23 People provided or paid for a service, for documents, for
24 authentications, and you have 32 boxes to go through if you
25 want to.

03:40 1 The government wants to put this evidence up, and they
2 did put this evidence up, part and parcel, and here's some of
3 the problems and the reasons that I have to doubt their
4 evidence.

5 They want to put in portions of the transcripts and
6 not the whole recordings. I could have made you all sit here
7 for another week and listen to the whole recordings, but when
8 you listen to even that little bit, you can hear Mr. Wright
9 talking, you can hear that he believes what he's talking about,
10 and he believes it from the stand.

11 He's never made any guarantees. They -- one thing
12 that I had great concerns about, which is why I ended up having
13 to put into evidence, they kept talking about, well, Mr. Wright
14 never told you that he had clients going to prison or getting
15 arrested or whatever, federally indicted. Well, what the
16 testimony shows, and just like I asked the tax preparer, have
17 you had clients audited? Is that something that you tell them
18 right when they come in? She says no.

19 Well, but not only that, is the only information that
20 we have in evidence is that he didn't have any contact with
21 these people until September, after they were indicted. You
22 have their indictments. You can go through and look.

23 And not only that, but in April of 2015 -- they were
24 originally indicted 2014 -- 2015, they superseded it, meaning
25 they added more counts or more defendants, which they could do.

03:42 1 And if they thought that Mr. Wright's conduct was so criminally
2 connected to these people, then add him to it, but they didn't
3 do that. They didn't do that. But they want to question each
4 and every witness about if they knew about his interaction with
5 this other family.

6 Mr. Pearson said something in his closing that really
7 stuck with me. Well, we have Kendra Wright -- I mean, Kendra
8 Jackson, well, we got to believe her. Do we? He said she's
9 not a mastermind, and she is a coconspirator.

10 Well, I'd take it a step further. She's an untruthful
11 person. Her sister got up here and said, yeah, we filed 1099.
12 You look in the box, you'll have the availability if you want,
13 and I would encourage you, if you want to thoroughly
14 investigate, look in those boxes, Box No. 3, Box No. 4, you
15 will find 1099 forms. Kendra Wright says, Oh, I never filed
16 nothing, but Linda -- that's why we keep witnesses separate.
17 Linda gets up here and tells the truth. Kendra Wright drags
18 Ms. Jackson into this by doing her own thing outside of the
19 knowledge, and against the knowledge, of Mr. Wright. Not
20 Mr. Wright.

21 The reason that I put the public index searches in is
22 to -- for a timeline. The last few days that I've sat here and
23 listened to the government's evidence, I've really had concerns
24 about what I felt was being displayed, is that Mr. Wright was
25 taking tons of money, which you'll get to add it up, and that

03:43 1 he was just scamming these people. No, he was generating
2 documents and providing them services that he genuinely
3 believes in, and still does.

4 But he's not the reason that these people lost their
5 homes. He's done nothing but try to help these people. And
6 that's why these documents showing the timelines of foreclosure
7 orders and sale orders already being entered were so important.
8 That's why, when Agent Desmond gets up on the stand and
9 testifies that he believes there's a pending foreclosure
10 action, that's why we put in the public index search, because
11 when you read that, it says closed. Closed.

12 So to say that this never worked and there was never
13 any satisfaction is a misstatement. It's misleading. Now, did
14 it work because gold and silver or whatever beliefs are? And
15 I'm not belittling Mr. Wright. Those are his beliefs. And
16 just like any area of beliefs, we all have our different ones.
17 Some people believe in Jesus. Some people don't believe in
18 Jesus. We don't put them in jail. We don't put people in jail
19 for differences of opinion.

20 The criminal mind and the criminal acts of Mr. Wright
21 have not been proven in this case. When you listen to the
22 judge's instructions on Count 1 specifically, with the good
23 faith belief and the good faith defense, consider what
24 Mr. Wright himself said. Consider the money that he took, the
25 work that he did, the work that he provided, and when you do

03:45 1 that, you will find Mr. Wright not guilty.

2 THE COURT: Thank you.

3 All right. Mr. Brooker?

4 MR. BROOKER: Let me start off by saying something
5 that I told you at the beginning of the trial during my opening
6 remarks, and I think it is so important it bears repeating
7 because I can't -- almost can't contain myself, and that is
8 that anything that attorneys say in this courtroom is not
9 considered to be evidence at all.

10 And I hope you've been taking good notes. I hope
11 you've been taking real good notes and rely on your notes,
12 instead of relying on what someone tell you the facts are.
13 Because if you can remember just a minute ago, I think the
14 government says that Ms. Jackson, Joretta Jackson went to
15 Kendra and says, Well, Kendra, can you please prepare these
16 checks for me so I can take them to the government and satisfy
17 my taxes? Flat-out false. Flat-out false.

18 You're not entitled to your own facts. The facts and
19 the evidence comes from the stand, they come from the
20 witnesses, they come from this evidence. They don't come from
21 us attorneys. And I think that's -- and whoever made that rule
22 must have been brilliant. Please look at your notes. Please
23 listen to what those witnesses said on the stand, because it is
24 critically important, because that is not what Kendra Jackson
25 said.

03:48 1 In fact, all of the government's witnesses was more
2 favorable to Ms. Jackson than they were to the government. And
3 you cannot spin that. Let's talk a little bit about the law
4 and then let's talk a little bit about the facts and the
5 evidence that came from those witnesses. Is that Ms. Jackson
6 is charged with what's referred to as, and of course is, and
7 I'll read it here, she's charged with the violation of
8 26 U.S.C. 7212(a). Now, that's the -- and of course what the
9 government is alleging, and this is what they're alleging.
10 I'll read it to you.

11 The government is alleging that Ms. Jackson, by a
12 worthless check scheme whereby she created false and fraudulent
13 payment instruments using routing numbers and account numbers
14 from a closed account and submitting such financial instruments
15 to employees of the Internal Revenue Service for the purposes
16 of satisfying her tax debt.

17 She created these instruments, is what they're saying.
18 She did this. It was her idea. Flat-out false. Flat-out
19 false. You're not entitled to your own facts.

20 Let's talk about what came from the stand. Let's talk
21 about the elements before we get to that, what the government
22 has to prove. And each and every one of the elements of this
23 offense, the government has to prove it beyond a reasonable
24 doubt.

25 The burden is never on the defendant. The defendant

03:49 1 never has to prove anything. Not a lick. They have to prove
2 every essential element and they have to prove it beyond a
3 reasonable doubt.

4 Those elements are: The government must first prove
5 beyond a reasonable doubt that the defendant Joretta Jackson
6 endeavored to obstruct or impede the due administration of the
7 Internal Revenue Service.

8 Secondly, they have to prove -- the government must
9 prove beyond a reasonable doubt that Joretta Jackson's alleged
10 endeavors to obstruct or impede the due administration of the
11 Internal Revenue Codes was done corruptly -- it was done
12 corruptly.

13 And what "corruptly" is, is a specific intent crime.
14 It requires specific intent. And the judge is going to
15 instruct you that. And what "specific intent" means is, is
16 that they have to prove beyond a reasonable doubt that Joretta
17 Jackson says, I know what I'm doing is against the law and I
18 specifically intend to do this for the purposes of obstructing
19 the due administration of the Internal Revenue Service.

20 In addition to that, they have to prove or show beyond
21 a reasonable doubt that there's a nexus between the defendant's
22 alleged unlawful conduct and the particular administrative
23 proceeding, which means that they have to show that there was a
24 particular administrative proceeding going on at the time and
25 that she said, you know, I am going to interfere with that

03:51 1 particular administrative proceeding.

2 And that particular administrative proceeding can be
3 an audit, sometimes you get audited by the Internal Revenue
4 Service, or it can be a criminal investigation going on by the
5 Internal Revenue Service, but it has to be a specific
6 administrative proceeding and it can't be day-to-day
7 communications. The judge is going to instruct you that.

8 And so when Mr. -- when Mr. -- when the government
9 says, well, look at all of these communications that she's been
10 going -- that she had with the Internal Revenue Service, where
11 she told the Internal Revenue Service, you know, that, hey, my
12 tax -- hey, I had a tax preparer back in 2006 and 2007 that
13 created -- that actually created -- or wrongfully did my taxes,
14 and she said -- and I think, if you can remember, Misty Davis
15 testified to this, that when she interviewed her back in 2013,
16 she told her about her going to this tax preparer that screwed
17 up her 2006 and 2007 taxes. She went to a tax preparer in
18 Fayetteville, a CPA in Sumter, and of course, another one.

19 And if you can remember, the government asked this
20 question, well, isn't it suspicious? Why didn't she go to
21 H&R Block? Why did she have to go to a CPA or even a tax
22 preparer in some other jurisdiction? Like that is against the
23 law. Smoke and mirrors. Where is the proof beyond a
24 reasonable doubt?

25 And of course is, is that he says, well, she's making

03:53 1 all of this stuff up. Well, if she made all of this stuff up,
2 well, they had an investigator to come and visit with her. She
3 gave her all of that information. Why didn't that investigator
4 go and follow up on anything? Why didn't that investigator go
5 check those tax preparers and said, did Ms. Jackson come see
6 you for assistance, you know, with her tax returns? None of
7 that.

8 Misty Davis, the investigator, testified that she came
9 out and saw Ms. Jackson in June of 2013. And when she came and
10 saw her in June of 2013, it was because she said she had
11 received a report that Ms. Jackson had a lot of money flowing
12 through her account, and of course, that's the account -- the
13 African prince scheme thing that you heard that was going on in
14 New York. That she was a victim of.

15 And then of course is, if you can remember, I asked
16 her, Did you tell her you were under investigation? Did you
17 say, We are investigating you for something? And she says no.
18 If you can remember, I asked her, Did any member of your team
19 tell her, Hey, Ms. Jackson, we are investigating you? And she
20 said no.

21 And you know why that is important? That's important
22 because they have to identify a specific administrative
23 proceeding, like an investigation or an audit, and at the time
24 in which she submitted those -- and I won't even call them
25 checks, but instruments in 2015, in February 2015, the rule

03:55 1 says that they have to show that there's a nexus between the
2 specific administrative proceeding, and of course is, that her
3 conduct, her conduct must have been done for the purposes of
4 interfering with the specific administrative proceeding.

5 And to put that in short, she must have said, the IRS
6 is investigating me, or the IRS is auditing me, and let me take
7 these fraudulent checks and submit them to the IRS for the
8 purposes of interfering with their criminal investigation, or
9 for the purposes of interfering with their audit. Well, guess
10 what? You can't interfere with something that you don't know
11 exists. Misty Davis says she did not tell her there was an
12 investigation going on.

13 And Misty Davis also testified to the fact that when
14 she saw in -- I think in 2013, when she saw her in 2013, she
15 didn't see her again until 2015, a year and a half to two
16 years. Is it reasonable for her to expect, if the Internal
17 Revenue Service, specifically the criminal division, criminal
18 investigation division, doesn't contact you for two years, is
19 it unreasonable for her to suspect that, hey, you know,
20 specifically when Ms. -- when Misty Davis says, well, we didn't
21 tell her that she was under investigation, and then we didn't
22 see her again until another two years until after she sent
23 those checks in, and then once she sent those checks in, those
24 instruments in, then of course those instruments then were
25 referred to the criminal division and then Misty Davis comes

03:56 1 out and see her again.

2 What criminal -- what criminal proceeding specific --
3 what specific administrative proceeding that she was trying to
4 interfere with when she submitted those checks? None. She
5 wasn't trying to interfere with an audit, because you'll have
6 these forms here, the ones that we put into evidence. They
7 somehow got covered up. There they are. You'll have these
8 back here. And of course, we put them in the evidence for you
9 to see them.

10 And of course is, this is a letter from the Internal
11 Revenue Service dated May 30th, 2014. This is in reference to
12 her tax debt. They told her that particular period of time,
13 the Internal Revenue Service at that particular period of time
14 was considering levying against her. She went to an
15 administrative proceeding and had a hearing before a hearing
16 judge, for that hearing judge to make a determination as to
17 whether or not they should levy against her.

18 And guess what that hearing judge says? No, we're not
19 going to levy against her. And then of course is, is that I
20 think the next month, June 17, 2014, they sent a letter out to
21 her telling her, you know, exactly what she owed and telling
22 her, case closed, currently not collectible. They end the
23 collection status against her.

24 So she was under the impression that, hey, I owe a
25 debt to the Internal Revenue Service, I still got that \$77,000

03:58 1 to pay, because that's what that letter says. Just because
2 you're in noncollect status, it doesn't mean that the debt
3 disappear. You still owe it. It's still going to be
4 collecting fees. It's still going to be collecting interest.
5 You still owe it, but we're just not trying to collect it now.

6 Well, what should she think when she received that
7 letter? Does that put her on notice that there's some sort of
8 administrative proceeding that's going on, specific
9 administrative proceeding, like an audit or investigation? It
10 doesn't. They've failed to prove that. They've failed to
11 prove that.

12 And of course, listen to the judge's instructions in
13 reference to this, in reference to what they have to prove, and
14 see if they can prove every bit of it beyond a reasonable
15 doubt, and they can't. They have failed in that, and they have
16 utterly failed in that. Royally.

17 The star witness that got up on the stand, the witness
18 that was supposed to basically said that she was involved in
19 this scheme, was actually Kendra Jackson. Kendra Jackson got
20 on the stand and Kendra Jackson says that she's been working
21 for -- she came and started working for Money Solutions, and
22 that she was taught these different techniques at Money
23 Solutions, and that is, that she tried them on her own, to
24 discharge her own debt, but they didn't work.

25 And if you can remember, I asked her, well, how did

03:59

1 Ms. Jackson learn about it? Well, she says that her and
2 Ms. Jackson goes to the same church and of course is, is that
3 when she learned about these things, she was excited about it.
4 She came to her church members and told some of her church
5 members about, you know, these new ways that you could use to
6 discharge your debt.

7 And she said that Ms. Jackson, along with their
8 preacher, came down to find out about it. And the first thing
9 that they did is that birth certificate thing, and you have all
10 of this here. You'll have it here. They did that birth
11 certificate -- that authentication of your birth certificate.
12 It will all be here. Take a look at it, please, because it
13 corroborates everything that she says. She paid
14 Mr. Wright \$500 for it.

15 And of course is, if you heard Kendra Jackson says
16 basically is that how she ended up doing this debt dissolution
17 thing was, is that Ms. Jackson went to Mr. Wright to talk with
18 Mr. Wright about doing the debt dissolution. And then of
19 course is that Mr. Wright, you know, for some reason, didn't
20 want to do it. Kendra said that she tried to intervene and she
21 went to Mr. Wright to figure out why wouldn't you do this? And
22 of course she felt that he should do it because with this birth
23 certificate thing that she had paid \$500 for, you know, that
24 really is that he was kind of stalling her on that.

25 So she said that she started the proceedings and she

04:01 1 learned those techniques, and I specifically asked her, those
2 techniques that she had been taught in that office, this UCC
3 stuff. And of course is, you can see it on Mr. Wright's
4 application, that there is a section there where you can apply
5 for this UCC service. And Kendra basically said that she
6 instructed Ms. Jackson, I'll help you out with this. Give me a
7 canceled check. And she said she created the canceled checks,
8 using the techniques that she had learned through Money
9 Solutions. That she had tried on her own. Her sister said
10 that she had tried the same technique to discharge her debt by
11 creating the canceled check.

12 And of course is, is that she said after she created
13 the canceled check, and you'll have it here, please look at
14 this stuff, and I asked her, on Joretta Jackson No. 6, I said,
15 well, did you give this to her? She said, yes, I created this
16 and gave this to her. And what this is, is that this is a
17 specific instruction sheet after she created, you know, those
18 fraudulent instruments, how she -- how she was to endorse them
19 and send them over to the Internal Revenue Service. She wrote
20 it all out and gave Ms. Jackson instructions.

21 And the government says, and Ms. Jackson came to
22 Kendra and says, please create these fraudulent checks. And of
23 course Kendra said that Ms. Jackson had nothing to do with it.
24 That she didn't know anything about this UCC stuff. That she
25 came in just like all the other clients of Money Solutions, all

04:03 1 those other clients that was marched to the stand and testified
2 that they went to Money Solutions for services and that those
3 services failed, Ms. Jackson is one of those people.

4 And of course, Mr. Wright even testified, you know,
5 that he gave her this CUSIP certificate, and you'll have that
6 back in the room, that basically says that her Social Security
7 number with a pool was worth over five -- worth nearly five and
8 a half billion dollars, and that that could be used to
9 discharge debt.

10 It probably all sounds crazy right now, but guess
11 what, it didn't sound crazy to a lot of these people. It
12 didn't sound crazy to a lot of these people.

13 I even asked Kendra, you know, when Ms. Jackson -- did
14 Ms. Jackson ask you whether or not this was legitimate? And
15 she said, Yes, Ms. Jackson came to me and says, Kendra, is this
16 on the up and up? And Kendra Jackson says, Yes, it is, and
17 told her that it was on the up and up.

18 And she said it wasn't until around October that she
19 really began to have doubts, when Ms. Ward came in and they had
20 the shouting match. I mean, she started having real doubts
21 then. Mr. and Mrs. Ward came in, they had shouting matches,
22 and of course the police was called, and that was a month
23 before the FBI came and raided the place. A month before the
24 FBI came and raided the place.

25 I'm about to sit down because I know my time is

04:04 1 running out, but let me say a couple of other things before I
2 do. And that is, believe Kendra Jackson. She was there. She
3 knows. Believe Kendra Jackson. She says that she went to
4 Mr. Wright and talked with Mr. Wright about the technique of
5 using the canceled check, to clear that with Mr. Wright to make
6 sure it would work before she then did it. And she said she
7 generated those checks and gave them to her. It is a fact.
8 You can't change that.

9 She said Joretta Jackson did not know anything.
10 Joretta Jackson came and never met Mr. Wright or Money
11 Solutions before until Kendra, someone in her church member,
12 came and turned her on to it. Same way -- and Ms. Jackson came
13 in the same way a lot of other clients did: somebody said
14 there's something good going on here, they can help you out.

15 And of course is, is that every last one of the people
16 that got on that stand, if you can remember, they were all
17 desperate. They had mortgage problems, they had other debts,
18 and they were looking for solutions. Same thing with
19 Ms. Jackson. Even though her taxes was in noncollect status,
20 that letter from the IRS says, You still owe it. It's still
21 going to -- we're not going to collect it right now, but you
22 still owe us the \$77,000, and it's going to keep on building
23 and building and building.

24 So she heard about this wonderful idea from this
25 legitimate business, and if you can remember, I asked each and

04:06 1 every one of Mr. Wright's, of Money Solutions' clients that
2 they got on the stand, Did you believe this? Did you thought
3 it was a legitimate business? When you saw that it was in a
4 business park, when you saw that there was desks and computers
5 and staff and files, did it give the appearance of being
6 credible to you? And they all says yes. And they all said
7 yes. They all believed it was a legitimate business, just like
8 Ms. Jackson did.

9 And of course that's relevant to another defense the
10 judge is going to talk to you about, and of course, that is
11 going to be the one defense, that is going to be the good faith
12 defense.

13 Folks, the good faith defense basically says that if
14 someone reasonably believed that something is true, if they
15 reasonably believed that this stuff was true, and proceeded --
16 and proceed based upon their belief that this stuff is true,
17 then of course is that that negates specific intent. And
18 specific intent is what's required in order for them to be
19 guilty of a crime. They have to have intended to commit a
20 crime. And you can't intend to commit a crime, you can't have
21 specific intent to commit a crime if you reasonably believe
22 that what you were doing, what was happening on your behalf was
23 legitimate.

24 And of course she also is going to instruct you on
25 what's called -- on what's called, and of course -- on what's

04:07 1 called -- I'll say this, I'm about to sit down, I know my time
2 is running low, but I just think it's real important, she's
3 going to instruct you on what's referred to as the good faith
4 reliance on expert advice.

5 And it basically says is that when we go to experts,
6 or people we believe to be experts, professional organizations,
7 and we seek their advice and they give it to us, like you go to
8 a doctor or go to a lawyer, you go to a tax preparer, or you go
9 to a debt resolution business, and you think that these people
10 are actually legitimate businesses, they represent themselves
11 that way, and you trust in that and they give you bad advice,
12 then guess what? You're not responsible for violating the law
13 if you relied on that advice, if you had a good faith belief
14 that the information that was given to you was accurate. And
15 that's one of the things that all of those witnesses say: we've
16 got a good faith belief, we believed it was true.

17 Now, I'm not going to get a chance to get up here and
18 speak to you again. The government has the last word. But one
19 of the things I want to say to you before I leave, and that is,
20 please, please read your notes and rely on your notes and not
21 rely on spin. Think about what those witnesses testified to.
22 Think about what they testified to. And if you follow the --
23 if you follow the testimony of those witnesses, if you listen
24 to the exhibits that was prohibited [as said], then of course
25 they'll lead to one conclusion, that Ms. Jackson, Joretta

04:09 1 Jackson, was a victim, just like all the other victims.

2 She believed in something, you know, that
3 unfortunately turned out to hurt her. She believed in
4 something that turned out to hurt her. That's unfortunate, and
5 of course is, is that just like all the other people that got
6 hurt, all the other people that lost their homes, she got hurt
7 too. Her debt's still there. Her debt's more than it ever was
8 before. She's working with the Internal Revenue Service to pay
9 it off right now. But she thought it was legitimate. And
10 that's the flat-out truth. Thank you very much.

11 MR. PEARSON: Now, when I first stood before you on
12 Tuesday, I said I anticipated that during the course of this
13 trial you were going to be distracted with all manner of
14 interesting sounding words jammed together, Uniform Commercial
15 Codes and International Bills of Exchange, money orders, and
16 that's exactly what we've had during these past four days.

17 You may remember, through the course of the testimony,
18 that I asked just about every witness that had contacted
19 Mr. Wright, did they have confidence in him? I even asked
20 Mr. Wright if he was confident and if he gave that confidence
21 to others. There's a real distinct reason I did that. There's
22 a term, con man. What many people don't know is that the con
23 is short for con men. And the reason that cons work is that
24 con men are able to talk to people and give them confidence
25 that what they are saying is, in fact, true.

04:12 1 And whether it is this debt resolution service or
2 profit clicking or the Kindred Hearts giving program,
3 Mr. Wright has shown that he is able to instill confidence in
4 others and con them out of their money, and that is exactly
5 what we have seen through the evidence presented here in this
6 courtroom.

7 Now, the defense talk a great deal about beliefs in
8 America and how we were founded. Ladies and gentlemen of the
9 jury, this may be very difficult for you to believe, but I was
10 a big nerd in high school, and one of the big nerdy high school
11 things that I did was debate. And one of the things I learned
12 from debate is that when you are given an argument, a very good
13 argument -- and you'll see this whether it's sports or politics
14 or anything else that people argue about, whenever you're given
15 a really good argument and you can't argue against it, you do
16 what's called creating a straw man and you argue against
17 something that the other people never said.

18 For instance, if I -- if it were 80 degrees and sunny
19 and nice and just a hint of breeze and I said, Man, it's a nice
20 day, hard to argue against, so you might say something along
21 the lines of, Oh, but it's not raining and if it never rained,
22 the plants would never grow and we'd all die. Therefore, not a
23 nice day. Nobody ever said anything about it not raining.

24 And just like that argument, the government hasn't
25 said anything about beliefs. No one particularly cares what

04:13 1 his beliefs are. What we do care about is the fact that he
2 lied to people and convinced them and conned them into giving
3 him their money.

4 Now, with Mr. Wright, one of the last things that his
5 attorney said was these people were already in foreclosure.
6 It's not his fault that they lost their house. All of these
7 things happened, and you can go back and you look at all these
8 documents and papers and you'll see that these dates were
9 before they talked to them. Yeah, exactly. He knew all of
10 this.

11 He knew all of this because these were very desperate
12 people. All they wanted to do is try to hold on to their
13 house, and he shows up and he cons them. He cons them out of
14 their money and he cons them out of any chance they have to
15 keep their homes. And that is despicable. And he is guilty of
16 conspiracy to commit mail and wire fraud and he is guilty of
17 filing that fraudulent tax return.

18 Now, Joretta Jackson. Joretta Jackson. Now,
19 Mr. Brooker, I think very rightly, pointed out that you're not
20 entitled to your own facts. I wholeheartedly agree.
21 Mr. Wright's not entitled to his own facts. Ms. Jackson is not
22 entitled to her own facts. The facts of what we had here are
23 exactly as I told you.

24 Ms. Jackson was involved with just discussion after
25 discussion after discussion, talk after talk after talk, claim

04:15 1 after claim after claim, false claim after false claim about
2 her identity and all sorts of other things with the IRS. And
3 the facts are that after doing all of that, it did not work.
4 And so what Ms. Jackson did was something that a lot of people
5 try to do: She tried to get over it. She tried to do
6 something and see if it would work.

7 Now, what you heard is that she received a letter --
8 she received a letter, case closed, currently not collectible.
9 But what they did not point out to you, because they -- because
10 they didn't point it out to you, is that it says not only do
11 you still owe, because you still owe, we may reopen your case
12 and resume collection activities in the future if your
13 financial situation improves.

14 And let me tell you what improves your financial
15 situation: Several hundred thousand dollars going through your
16 bank account. And that is what we heard from Agent Davis.
17 That is what the evidence in this case has shown. And I point
18 this out to you. We were talking about reasonably foreseeable
19 and we talk about the fact that after the initial interview,
20 she clearly knew that something -- something was up, but
21 there's two things I want to point out.

22 The first. If, as the defense claims, she had no idea
23 anything was going on, then I tell you, ask yourself, if she
24 didn't think anything was going on, and she believed this
25 letter, that it was not collectible, and she believed that it

04:17 1 was over, why would she randomly show up in January or February
2 of 2015 and try to pay this debt off? Well, I can tell you.
3 You can go back through all of her contacts and see that she's
4 been calling, she's been disputing, she's been trying to get
5 that number changed. And she went to Mr. Wright to see if he
6 could do something.

7 Now, the other thing, Mr. Wright got on the stand and
8 he testified, At the time I didn't really do much with taxes.
9 Members of the jury, I would posit this to you: The reason
10 Mr. Wright didn't do much with taxes is because he had received
11 letters from both -- or correspondence with both the South
12 Carolina Department of Revenue, talking about Mr. Allen Myrick,
13 who is the prosecutor, and he wrote the letter of apology
14 saying, Oh, I've talked to a lawyer and, you know what, after
15 talking to him, I'll make sure I don't do this anymore, and he
16 also got stuff from the IRS saying what you're doing is fraud.

17 So Mr. Wright, knowing that the IRS and the South
18 Carolina Department of Revenue were looking into that thing,
19 would not mess with them because he had a good thing going at
20 Money Solutions and he didn't want to get caught. Because he
21 didn't want to get caught, he didn't want any tax information
22 going out. And then Joretta Jackson shows up and he takes her
23 money and that's what she wants, and as I explained before,
24 it's a bridge too far for him, not interested. And then
25 Joretta Jackson goes around him to her friend and gets these

04:19 1 checks and tries to pay.

2 Lastly, with Joretta, with Ms. Jackson, Mr. Brooker
3 explained a moment ago that there was something wrong with the
4 question of, well, why would Ms. Jackson go to various
5 different professionals in different places, why would she go
6 to North Carolina, why would she go to other states? And he's
7 right, there's absolutely nothing wrong with going to somebody
8 who makes you feel comfortable.

9 But I would point this out. They would have you
10 believe that she went to Money Solutions, Mr. Wright wouldn't
11 do what she wanted him to do, and then she got it from Kendra
12 Jackson, and that she didn't know that what she was doing was
13 fraud when she went and took those checks over there.

14 But right in here all these contacts, you will be able
15 to see that Ms. Jackson had all sorts of powers of attorneys
16 with actual professionals, tax preparers, CPAs. She would have
17 you believe that she innocently relied on what Money Solutions
18 told her, and yet there is no evidence that she ever contacted
19 one of these actual professionals that she had hired herself to
20 do her taxes and deal with the IRS.

21 Moreover, clearly, Ms. Jackson isn't afraid to contact
22 the IRS herself, and there is nothing in here to indicate that
23 she ever called and said, Hey, you know, I went to this place
24 and they told me I could write these checks on this closed bank
25 account. Is that cool? Nothing in there about that. But they

04:21 1 would have you believe that she really thought that these
2 checks were good.

3 Now, members of the jury, I would say that that is
4 clearly not good faith. That is evidence of a person who's
5 trying to get over, a person who is trying to see, let's see if
6 this works. Let's see if I get caught. She did not rely on
7 good faith. And the evidence has clearly shown that
8 Ms. Jackson is guilty of Counts 2 and 3.

9 In closing, the government has proven beyond a
10 reasonable doubt, through those elements that the judge is
11 about to read out to you, that Mr. Wright is guilty of Counts 1
12 and 4 and Ms. Jackson is guilty of Counts 2 and 3. Thank you.

13 THE COURT: All right. Ladies and gentlemen, we're
14 going to -- I'm going to excuse you to your jury room for just
15 a few minutes so that I can get my charge together. Make sure
16 you run to the restroom because it's going to take a little
17 while, and we'll call you back in here in just a minute.

18 (Jury not present.)

19 THE COURT: All right. My plan is just to step back
20 here and make sure that Katherine has the charge all together
21 with the changes that we discussed. I'm going to bring it out
22 here and give you a chance to just sort of look over it real
23 quickly. Then I'll bring the jury in and give them the charge
24 and then we'll administer -- I mean, excuse the -- well, maybe
25 we won't excuse the -- it depends on whether or not we're going

04:23 1 to let them begin deliberating today. We either excuse the
2 alternates or maybe bring them back and excuse them on Monday,
3 if we do that, okay? So I will -- yes?

4 MR. PEARSON: Your Honor, there is one very brief
5 thing as it pertains to the jury instructions. In his closing,
6 Mr. Brooker specifically told the jurors to rely on their
7 notes. I believe there is a jury instruction that says that
8 they are not to rely upon their notes. That's not something
9 that we had added, but since it came up during closing
10 arguments, I do believe that it is --

11 THE COURT: All right. I think I have that in my
12 preliminary charge and I will remind them of that in my final
13 charge. All right.

14 (Recess, 4:24 p.m. to 4:32 p.m.)

15 THE COURT: Please be seated. I understand there may
16 be some consensus about maybe the best thing to do at this
17 point would be -- and my clerks chimed in immediately, that it
18 might be a better idea to wait and charge the jury on Monday
19 morning and then let them begin their deliberations then.
20 Because my plan was to charge them and send them home, but it
21 may make better sense, and I'm getting a real thumbs up for
22 that from chambers, because they are kind of trying to mesh all
23 this stuff up together.

24 So I think what I'll do is I'll bring them in and
25 excuse them until Monday morning, begin right at 9:00, okay?

04:32

1 MR. PEARSON: That would be fine.

2 MS. ZMROCZEK: We agree as well, Your Honor.

3 THE COURT: Is that all right?

4 MR. BROOKER: That's fine. I'm going to grab my
5 client and bring her back in before you bring the jury in.

6 THE COURT: Oh.

7 MR. BROOKER: She just stepped out.

8 THE COURT: Do you want me to repeat this when she
9 comes back in?

10 MR. BROOKER: No, I don't think it's necessary.

11 THE COURT: All right. I'll just wait for you to
12 bring her in, then.

13 (Ms. Joretta Jackson is now present.)

14 THE COURT: All right. I think we're ready for them.

15 (Jury Present.)

16 THE COURT: All right. Ladies and gentlemen, I hope
17 you're going to be pleased with this decision, but after
18 conferring with the lawyers, we've decided that it makes more
19 sense to wait and give you your charge on Monday morning. It's
20 been a long day, and the charge -- even though you'll have a
21 copy of the charge back there with you, I do want you to listen
22 to it carefully and be fresh and so it will all be hopefully
23 clear in your mind before you begin your deliberations.

24 So I'm going to release you for the weekend, be back
25 in your jury room at 9 o'clock Monday morning. Don't talk

04:35 1 about -- I know -- now you've heard all the evidence and you're
2 probably anxious to, but don't talk about the case with
3 anybody, not while you're home this weekend with anyone.
4 Please don't do any internet research or anything like that.
5 If there's something about it in the paper, just look away.
6 And don't talk about it with each other until I give you that
7 charge and I send you back there to begin your deliberations.

8 So with that, have a nice weekend, appreciate your
9 attention, and I'll see you Monday morning.

10 (Jury not present.)

11 THE COURT: And I can't guarantee it, but my
12 expectation is that Katherine will probably email to you all
13 what she thinks is the final draft so that you can look at it
14 in advance of Monday. I would give you some time that morning
15 anyway. I certainly am going to look at it to see if there are
16 any final changes we need to make before we make a copy for the
17 jury and I read it to them. Okay?

18 MS. ZMROCZEK: Thank you, Your Honor.

19 THE COURT: Anything else?

20 MR. PEARSON: No.

21 THE COURT: All right. Have a nice weekend. I'll see
22 you Monday.

23 (Proceedings adjourned at 4:37 p.m.)

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UNITED STATES OF AMERICA)
DISTRICT OF SOUTH CAROLINA) ss:

C E R T I F I C A T E

I, Carly L. Horenkamp, Certified Shorthand Reporter in and for the United States District Court for the District of South Carolina, do hereby certify that I was present at and reported in machine shorthand the proceedings had the 16th day of November, 2018, in the above-mentioned court; and that the foregoing transcript is a true, correct, and complete transcript of my stenographic notes.

I further certify that this transcript contains pages 740 - 960.

IN WITNESS WHEREOF, I have hereunto set my hand at Columbia, South Carolina, this 3rd day of August, 2019.

/s/ Carly Horenkamp

Carly L. Horenkamp, RDR, CRR, CRC
Certified Shorthand Reporter