

Exhibit A

AFFIDAVIT

Christopher E. Cotten, being duly sworn, states as follows:

1. I am an Assistant United States Attorney for the Western District of Tennessee and have been so employed for approximately 33 years.

2. The information in this affidavit comes from court records, as more specifically set forth below, and other government personnel with firsthand knowledge of the facts contained herein.

3. On May 25, 2017, a federal grand jury in the Western District of Tennessee returned an indictment in Case No. 17-20151 charging Tonja Hosey and 17 co-defendants. (RE-4, Case No. 17-20151: Indictment. All further record citations herein refer to this case.). The indictment charged drug trafficking, money laundering, and criminal structuring. *Id.*

4. Count 10 of the indictment charged Hosey, along with co-defendant Fred McCaster Jr., with conspiracy to structure financial transactions. *Id.* Specifically the indictment alleged the following:

a. McCaster would provide cash to Hosey, or would direct others to do so; and Hosey would make cash deposits below \$10,000 into bank accounts. *Id.* at PageID58.

b. These deposits were either made into separate accounts held at the same bank on the same day, into separate accounts held at the same bank on different days, or into separate accounts held at different banks on the same day or consecutive days. *Id.*

c. In structuring the transactions in this manner, McCaster, Hosey, and others caused the financial institutions involved not to report the currency transactions as required by law. *Id.* at PageID 59.

d. These structured transactions occurred between March 13 and April 8, 2014, and totaled \$172,890.00. *Id.* at PageID 59-60.

e. The structured funds were then used to purchase One Parcel of Real Property Located at 8770 Oak Ridge Drive, Walls, Mississippi (“the Oak Ridge property”). *Id.* at PageID 59.

5. On August 23, 2018, the Court entered an order (RE-360) granting the government’s motion to conduct a private judicial sale of the Oak Ridge Property. Tonja Hosey, the record owner of the property, did not oppose the motion. (RE-304: Motion for Private Interlocutory Private Judicial Sale at PageID 617).

6. The sale price was originally thought to be \$217,000.00 as indicated in the Court order (RE-700) confirming the sale of the Oak Ridge property entered on June 14, 2019. (RE-697: Motion to Confirm Sale of Real Property, PageID 2105).

7. After the deduction of costs and expenses, the net proceeds from the sale of the Oak Ridge Property was believed to be \$182,804.36. On December 11, 2020, the Court entered a judgment of default forfeiting the proceeds to the United States in Civil Case No. 20-2218-SHL-atc. (RE-22: Judgment).

8. However, the government is now aware that the actual net proceeds from the sale of the Oak Ridge property was \$193,554.36. The \$182,804.36 previously forfeited to the United States was the final closing amount and that the United States Marshals Service received a bid amount of \$10,750.00 which constitutes the defendant property in this case. This money is still being held in the U.S. Marshals Service’s Seized Asset Deposit Fund and is awaiting disposal.

9. On July 31, 2019, Tonja Hosey, entered a plea of guilty to Count 10 of the indictment. (RE-737: Order on Change of Plea. RE-788: Redacted Judgment).

10. Therefore, there are reasonable grounds to believe that the defendant property constitutes property involved in financial transactions in violation of 31 U.S.C. 5324, and/or property

traceable to such property, and is therefore subject to forfeiture to the United States pursuant to 31 U.S.C. 5317(c)(2).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of January, 2025.

s/ Christopher E. Cotten
CHRISTOPHER E. COTTEN
Assistant United States Attorney