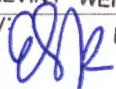


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**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA**

MAR 14 2024

KEVIN P. WEIMER, Clerk
By:  Deputy Clerk

<p>CRAIG CUNNINGHAM, Plaintiff,</p> <p>v.</p> <p>Manasseh Jordan Ministries, Inc., Bullion Fitness Inc., Kingdom Ministries Church, Inc., Yakim Manasseh Jordan, aka Manasseh Jordan, MJ Ministries Spreading the Gospel, Inc., Steven Sledge, Aaron Jordan, Naomi Cook, John/Jane Does 1-5</p> <p>Defendant</p>	<p>§ § § § § § § § § §</p> <p>1:22-cv-1419 <i>wmr</i></p>
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**Plaintiff's Response in Opposition To Defendant's Motion for Sanctions and Contempt and
Motion to Quash**

1. To The Honorable US District Court:

Defendant's Misstate the facts and relevant Background

- The Plaintiff's first Texas lawsuit is a useful guide about the litigation tactics and willingness to lie in discovery as well as likely sources of evidence of evidence that the Defendant's placing calls to the Plaintiff and calling records.¹
- In the Plaintiff's first Texas lawsuit, the Chase bank records of MJ Ministries Spreading the gospel showed over \$50,000 in money paid directly to Ytel a notorious robocalling platform

¹ See Defendant's affidavits and Interrogatory responses See Cunningham v Manasseh Jordan Ministries, E.D. Texas 4:19-cv-494, document 90, Compare Exhibits to document 90 E and E-1 with Specific discovery responses include Request for production #2, #4 and Interrogatory responses #2, #3 #7 #8 #9 #10 #12 #17 and Admission #7 #9 and Sworn verification from Luther Mckinstry dated March 17, 2020, document 90-8

that placed calls to the Plaintiff and millions of consumers across the country². Nowhere in these Chase banking records is any information about any congregants³.

4. Plaintiff did not violate the court's order in document 55, which states "*The court DIRECTS the clerk to make available ten subpoenas for Plaintiff to serve on third parties*". Plaintiff notes that records of payment to a phone company directly from MJ Ministries Spreading the Gospel bank accounts is absolutely good evidence and summary judgment proof to prove claims of calls being made to the Plaintiff and confirms which phone company was paid, how much, and when.
5. Chase Bank is a third party which previously had proof positive evidence of calls being placed and identified the robocalling platform Ytel was directly paid by MJ Ministries Spreading the gospel. Subpoenas to Ytel also confirmed that MJ Ministries, Yakim Jordan and Frank Juliano were all clients and used the services of Ytel to spam millions of calls across the country and were paid in the amounts shown in the Bank records as opposed to some other entity similarly named MJ Ministries as there are several similarly named entites owned and operated by the defendants. Records of payment to a phone company directly refute the Defendant's claims that they never placed the calls in question.
6. Plaintiff notes that in the original Texas case as in this case, Defendants claimed never to have made any calls and in the original Texas case paying Ytel, a notorious robocalling service any money in 2018 and 2019 at all under oath and penatly of perjury⁴. Defendant CFO and CEO Luther Mckinstry also denied that Yakim Jordan was involved or paid by MJ Minis-

² *ibid.*

³ See Exhibit E1 to document 90 in *Cunningham v Mamasseh* generally

⁴ See Defendant's affidavits and Interrogatory responses See *Cunningham v Manasseh Jordan Ministries*, E.D. Texas 4:19-cv-494, document 90, Compare Exhibits to document 90: E and E-1 with Specific discovery responses include Request for production #2, #4 and Interrogatory responses #2, #3 #7 #8 #9 #10 #12 #17 and Admission #7 #9 and Sworn verification from Luther Mckinstry dated March 17, 2020, document 90-8

tries at all as well under oath and penalty of perjury⁵. Specific discovery responses include Request for production #2, #4 and Interrogatory responses #2, #3 #7 #8 #9 #10 #12 #17 and Admission #7 #9 and Sworn verification from Luther Mckinstry dated March 17, 2020, document 90-8 and Affidavits from Steven Sledge dated Sept 12th 2019 and Wayne Taylor Affidavit dated May 29th 2020.

7. Plaintiff was not limited to just serving 3rd party phone providers in this court's order regarding subpoenas and records of payments to 3rd party phone providers are evidence of the calls being placed as described in the court's order issuing subpoenas.
8. Documented evidence of payments made to a specific phone provider is evidence of calls being placed to the Plaintiff. "Following the money" is absolutely one part of a strategy of investigation in part, particularly when dealing with parties willing to engage in perjury in the discovery process as CFO and CEO of MJ Ministries Spreading the gospel, Luther Mckinstry did.
9. More importantly, the evidence of the phone calls being placed to the Plaintiff were previously found in the bank records of MJ Ministries Spreading the Gospel. Plaintiff also sent these Chase Bank records for MJ Ministries Spreading the Gospel showing the records of payment to Ytel in the first Texas case to the Defendants as part of discovery in this current case⁶.
10. More to the Point, MJ Ministries bank records previously showed over \$50,000 in payments to robocalling platform Ytel, which were discovered in the Defendant's bank records in the previous Texas lawsuit, despite sworn interrogatory and affidavits to the contrary by CEO

⁵ See document 90, Exhibits I, Ex H and Exhibit K to document 90.

⁶ See Email to Defendants dated Jan 11, 2023 which includes the bank records, false affidavits from Sledge and Mckinstry and Wayne Taylor, Exhibits H, I, and K to document 90.

and CFO Luther Mckinstry who is a convicted felon for multiple counts of fraud. It is entirely reasonable to go back to the original source of these records of payment to a phone company, which prove beyond the shadow of a doubt that the Defendants were extensively engaged in large scale nationwide robocalling, which were their bank records proved.

11. Plaintiff has no problem with any objections to the subpoenas to the banks as it is documented and undisputed that the banking records of MJ Ministries previously showed multiple payments to a robocalling platform despite the lies by the Defendants to the contrary.
12. Plaintiff notes that in the original Texas lawsuit, defendants claimed in pleadings and sworn statements that they did not place any robocalls to the Plaintiff⁷.
13. Plaintiff has been seeking subpoenas in this case from literally day 1 as a request for a subpoena was sent to the court with the original complaint and a second motion for subpoenas was sent to the court and a third request for subpoenas again was sent to the court. Plaintiff has diligently been trying to get evidence that the Defendants made the calls in question and other evidence which may prove his claims.
14. The Plaintiff is no stranger to these defendants and how they operate and their litigation tactics, which in the prior Texas case included multiple counts of perjury in written discovery and boldly lying to the court in sworn declarations and interrogatory responses by Luther Mckinstry, CEO and CFO of MJ Ministries Spreading the Gosepl and Wayne Taylor corporate officer. Plaintiff notes that both Luther Mckinstry and Steven Sledge are convicted fel-

⁷ See Defendant's affidavits and Interrogatory responses See Cunningham v Manasseh Jordan Ministries, E.D. Texas 4:19-cv-494, document 90, Compare Exhibits to document 90 E and E-1 with Specific discovery responses include Request for production #2, #4 and Interrogatory responses #2, #3 #7 #8 #9 #10 #12 #17 and Admission #7 #9 and Sworn verification from Luther Mckinstry dated March 17, 2020, document 90-8

ons including arrests for crimes relating to violence for both individuals⁸. Additionally, Luther Mckinstry was convicted of multiple counts of felony fraud in his past.

15. Plaintiff's sole focus has been to obtain the means to investigate these claims about illegal robocalls and additional harassing and threatening calls which included death threats placed to the Plaintiff after the initiation of this lawsuit right around the time service of process was being executed on several corporate officers in this case.
16. Plaintiff never had the full ability to conduct all elements of discovery to include 3rd party subpoenas for any part of the 11 months, and only recently was granted a short window of 90 days to issue subpoenas, after the which is half of the typical time afforded for discovery.

Defendants Corporate officers engaged in perjury in sworn discovery statements in the first Texas lawsuit

17. In the first Texas lawsuit, *Cunningham v Manasseh Jordan Ministries, Inc.*, 4:19-cv-00494, Plaintiff heard similar claims that the defendants MJ Ministries Spreading the Gospel didn't place the calls and their claims that Yakim Jordan had no affiliation with MJ Ministries spreading the Gospel under oath and penalty of perjury.
18. Luther Mckinstry, CEO and CFO denied under oath specifically paying any money to Ytel, a notorious robocalling provider, when in fact, more than \$50,000 was paid directly via wire transfer from the Chase MJ Ministries bank account to Ytel. This is perjury, plain and simple and secondly, indicates that the bank records of MJ Ministries are not possibly, but likely to show direct evidence of payments to robocalling companies now as they did then. Wayne

⁸ See prison mugshots of Mckinstry and Sledge, Exhibits C and D to this motion

Taylor similarly pled under oath and penalty of perjury that Yakim Jordan had no involvement with MJ Ministries Spreading the Gospel.

Plaintiff's Subsequent Texas Lawsuit relates to harassing calls and death threats that occurred after the filing of this lawsuit and parties who have not yet been served in this case

19. Plaintiff is pursuing his claims in the second Texas case against Yakim Jordan who has not been served yet in this Georgia action. Additionally, Plaintiff's has new claims against all of the defendants who called him after the filing of this lawsuit using the website prankdial.com to continue to harass and annoy the Plaintiff and make death threats against the Plaintiff after being served in this current lawsuit⁹.
20. Most disturbingly, the Plaintiff was subjected to death threats in a several calls on the same day stating "your time will come" and "your days are numbered" and similar language¹⁰.
21. Plaintiff believes that the defendants are now only trying to cover up evidence of their threatening phone calls placed to the Plaintiff, which bank statements will show a record of payments to Prankdial.com as well as other phone providers related to the death threats placed during this call.
22. Plaintiff is in the process of identifying who placed these death threats to him, which represent new claims after the filing of this Georgia action, hence the new Texas lawsuit.
23. Plaintiff documented these calls with the date and time and sent a preservation letter to his phone service provider in anticipation of getting subpoenas issued promptly to him, but this

⁹ See Verizon Preservation letter detailing calls on or about May 3, 2022 Ex E to this motion

¹⁰ See Plaintiff's preservation letter to Verizon which has been served on the defendants in this case as part of discovery detailing threatening calls on or about May 3, 2022 emailed to Matt Kielson March 2023

process was substantially delayed, forcing the Plaintiff to live under the threat of harassment and death by convicted felons who have a history of violence.

24. Now the Defendants are using their attorney's to attempt to cover up for their misdeeds by obstructing discovery, lying in discovery, and their motion for sanctions, which will likely show that they paid for the offending harassing calls and death threats to the Plaintiff for filing a lawsuit and seeking to redress his claims in court, which ironically the whole point of a civil justice system is to reduce the incidence of violence.
25. Plaintiff is now in the process of moving as he was not able to obtain the subpoenas quickly and needs to take necessary steps to protect himself, which is the part of the reasons why he has been delayed in responding in this case. Plaintiff should not be subjected to death threats and have to physically move for being a consumer advocate and seeking to be left alone.
26. Defendants improperly conclude that the Plaintiff has not yet been able to tie the defendants to the calls. Plaintiff has identified the likely calling Platform which has a history of knowingly transmitting illegal robocall traffic, but they have been less than cooperative in the Plaintiff's investigation as far as naming subscribers of record. Plaintiff has identified the offending phone company and they have a track record of transmitting large quantities of illegal robocalls for scams, harassment, and other unsavory practices according to the FCC¹¹.

Plaintiff has identified the phone company in question that Defendants used to make the offending calls

27. Plaintiff has identified Aaron Leon and Thing Technologies as the company that owned the phone numbers in question, but is in the process of obtaining records from them. Plaintiff

¹¹ See 48 hour warning letter to Aaron Leon and Thing Technologies Dated March 22, 2022 from the FCC, Exhibit A to this document.

notes that Aaron Leon was issued a 48 Hour warning letter from the FCC as they were transmitting so many illegal robocalls that the FCC was going to shut them down nationwide and direct all telecoms to reject their traffic if they didn't stop knowingly transmitting illegal robocalls¹². Plaintiff notes this warning letter was sent in 2022 and the FCC's investigation shows call sin 2021 and 2022, which is around the time Plaintiff recieved unwanted calls from Defendants.

28. Plaintiff notes that Aaron Leon has been less than cooperative and is likely going to have to compel the records sought.

29. Plaintiff did issue written discovery in this case

30. Plaintiff did send the defendants discovery, which was ignored by some of the defenants.

31. The other defendants produced zero documents and simply objected to every question and request for production

The Defendant's Bank Records are not private banking records, but are public documents as MJ Ministries is a 501(c)(3) entity

32. Counsel for defendant wrongly claims that the Plaintiff is seeking the defendant's private banking records, which is incorrect. Defendant MJ Ministries is a 501(c)(3)¹³. These records are public information as they claim to be a charity and are subject to inspection by the public and are required to file form 990, which is again publicly available documents. Plaintiff notes that no form 990's have ever been filed by MJ Ministries Spreading the Gospel as required by the IRS.

¹² See FCC letter to Aaron Leon Ex A

¹³ See IRS 501(c)(3) letter dated May 29, 2019 Ex B to this document

33. Secondly, as the Plaintiff previously found evidence that the Defendants paid for robocalling services in their bank statements in the first Texas lawsuit, its quite likely and more than reasonable that the Plaintiff would again find more evidence of robocalling in their current bank statements.
34. Thirdly, nowhere in the bank records of MJ Ministries Spreading the Gospel or Paypal is any private congregant information shown. Plaintiff has never asked for this information, nor was it ever disclosed to the Plaintiff. Defendants are free to point out in the bank records exactly which private congregant information they are referring to, but they can't do it as the information doesn't exist¹⁴.
35. No Private congregant information was ever disclosed or sought in the subpoeans from the Plaintiff and a plain review of the financials show nothing specific about any congregation members or confidential information. The only thing the records show is that the Defendants lied under oath multiple times and then sought to conceal it by engaging in perjury and other abusive discovery tactics and continue to lie to the court about fictitious information not contained in their banking records.
36. As the court can plainly see from the Chase banking records and the Paypal records from the original Texas lawsuit, nothing in the bank records reveal anything about their religious congregants or confidential information about any individuals who may have made contributions to MJ Ministries. Plaintiff never sought this information, nor is there any personally identifiable information about names or account information of congregants. Defendants are flatly

¹⁴ See Chase bank records from the original Texas lawsuit and disclosed to the Defendants in discovery in this case. in email Jan 11, 2023 See email Exhibit **F** dated Jan 11, 2023 and Exhibits to Document 90 in Original Texas case, Exhibits E and E-1

wrong on this false assertion to the court and are simply lying to the court trying to mislead the court about the nature of what information is contained in their banking records.

37. Plaintiff does note that the banking records DO show that over \$50,000 in payments were made to a phone company, which proves CEO and CFO Luther Mckinstry and corporate officer Wayne Taylor lied in the interrogatories and affidavits and representations to the Texas court.

38. The Paypal records also show that Yakim Jordan is a signer on the MJ Ministries paypal account and is directly involved in the operation of the entity despite the sworn assertions under oath and penalty of perjury by Luther Mckinstry and Wayne Taylor that Yakim Jordan is not involved in the MJ Ministries operation and hasn't been paid by MJ Ministries at all.

Plaintiff's settlement discussions are confidential per rule 408 and have nothing to do with subpoenas issued.

39. Plaintiff objects to any discussion of settlement talks with the Defendants. These discussions are first confidential per rule 408. It is improper to include settlement discussions as support for their motion.

40. Plaintiff has explored settlement several times in this case, as the previous case was sent to mediation and the parties reached a resolution. Given the short window of time, Plaintiff is obviously pressing on with discovery, but also seeks to resolve cases as opposed to just litigating if the other side is reasonable and willing.

Defendant's improperly claim that his discovery efforts are related to seeking an advantage in settlement and these claims are simply refuted by the facts of this case.

41. The defendants falsely claim that Plaintiff is seeking some unfair advantage in settlement by ascertaining knowledge about the Defendant's financials. This presumes that the Plaintiff doesn't already have in depth knowledge of the Defendant's financial situation.
42. Plaintiff was sent in depth financial records of the Defendants in the past, for example showing that they had nearly \$4 million dollars in revenue in each year of 2018 and 2019¹⁵. Plaintiff is also aware of their ownership of a \$2.5 Million dollar home in Florida and disclosed all this information previously in discovery in this case¹⁶.
43. There are also news articles from 2019 before this lawsuit, which clearly show "*Federal Court Grants default judgment against prophet who made millions from robocalls*"¹⁷ and goes on to describe in depth the rolls royce cars and multi-million dollar homes that are flaunted to his parishonesrs and sold a dream the dream of achieving if they just make a donation to Yakim Jordan.
44. It is noted in the article that MJM doesn't appear to engage in the traditional activities of a non-profit Ministry and Frank Juliano admitted to Defendants engaging in much of this conduct that defedants "*Absoultely sent out calls featuring his pre-recorded voice.*"
45. This shows that the Defendants have more than sufficient funds to pay the Plaintiff and the Plaintiff knew this years in advance of even being granted subpoeans in this case and the Defendants knew that the Plaintiff knew this and yet they still lie and misled the court suggesting the Plaintiff lacked this relevant financial knowledge when he knew it years ago and dis-

¹⁵ See Document 90 and MJ Spread 007 exhibit to Document 90 and Exhibits E to document 90

¹⁶ See email to Defendants dated Jan 11, 2023

¹⁷ See Cook county Record article dated April 29, 2019

exF
exH

closed this knowledge to the Defendants in discovery and this information was reported in multiple news outlets.

46. The articles goes on to state:” At the time Molitor said he kept getting calls seeking money despite thousands of counsmer complaints, an FCC citation and multiple news articles decry- ing their practice:” and further describes the lavish lifestyle that is largely funded through seed-faith money donated to his nonprofit corporation
47. Plaintiff ALREADY had since 2018 and 2019, yearrs in advance of this lawsuit multiple fi- nancial disclosures relating to the finances of MJ Ministries Spreading the Gosepl and in depth knowledge of the Defendants financials and is acutely aware of their ability to pay the Plaintiff and has known this for some **3-4 years** in advance¹⁸.
48. Plaintiff has had this information for several years, and this is hardly any news or advantage in settlement. Plaintiff is well aware of the Defendants ability to pay and financial revenue and has known this for years and disclosed it to the Defendants in this current case.
49. Plaintiff may seek to settle cases at various times as he isn’t just litigating for the sake of fighting, but does actively seek to resolve his claims if the other side is going to be reasona- ble and not commit perjury. In the previous case, the parties went to mediation and the case was resolved.
50. Years ago the Plaintiff already had access to their Paypal records which show revenue num- bers and their Bank statements which showed over \$50,000 in payments to robocalling pro- viders¹⁹. None of this is new information, nor would any new financial information provide any advantage in settlement, assuming the parties even got to that point and the Plaintiff has

¹⁸ See MJ Spread007 showing 2018 and 2019 revenue.

¹⁹ See document 90 in Texas original case and Exhibits E and E1

had some 3-4 years to review all these documents in depth and obviously was well aware of these financial numbers in the previous lawsuit.

51. Plaintiff's sole intention in seeking subpoenas was to go back to one of the neutral 3rd party sources seeking records of payment by the Defendants of payments to robocalling platforms as they did in the first Texas lawsuit. Records of payment to dialing platforms is solid summary judgment evidence.

Plaintiff's subpoenas were directed to obtain evidence of payments to phone calls and were in compliance with the court's order 55. No contemptuous actions were taken by the Plaintiff

52. Payments to a phone company are direct evidence of phone calls being placed. Payments to a phone company show the specific phone company that was used by the Defendants, which can then be used to directly seek discovery from the specific phone company in question and proves a nexus between MJ Ministries and the phone company in question should they deny any involvement as well.

53. Defendants misstate the specific language in the court's order and the Plaintiff's motion seeking subpoenas. The court's order cites the Plaintiff is seeking "*documents from non-parties*" and "*the Court DIRECTS the clerk to make available ten subpoenas for Plaintiff to serve on third parties.*" and "*after serving his subpoenas Plaintiff develops evidence indicating that Defendants made the phone calls as he alleges, Plaintiff may file a motion for reconsideration of the court's order granting summary judgment*"

54. The bulk of the court's order makes specific reference to simply developing evidence indicating the Defendants made the phone calls as alleged. There was one sentence which refers to

phone companies, but the order generally refers to “third parties” and as such Plaintiff was never limited to only serving phone companies and Plaintiff should be permitted to seek evidence, particularly where it was previously found, which includes the bank records of MJ Ministries Spreading the gospel.

55. Plaintiff has followed the court’s order in good faith and by logic as he is seeking records of payment to phone companies where prior records were shown to be found and where the defendant’s lied under oath and committed perjury to conceal this information.

56. Records of payment for dialing minutes is absolutely “*evidence that the Defendants made the phone calls as alleged*” to the Plaintiff as described in the complaint. Some of this information was found in the Defendants bank records in the first Texas lawsuit. More concerning, Defendants engaged in perjury multiple times in the first Texas lawsuit lying in affidavits and written discovery and have a history of engaging in fraud.

Defendant’s lie to the court about Plaintiff obtaining private information about congregants

57. At no time was the Plaintiff ever seeking, nor did he receive any evidence of individual congregants who made donations to MJ Ministries, nor was any information about congregants ever sought or obtained in the original Texas lawsuit or the Georgia action.

58. Plaintiff has already had Defendant’s Chase banking records for several years and disclosed these to the Defendants in discovery in the Georgia action months ago.²⁰ Nowhere in any of the bank records or records from Paypal is any congregant information disclosed or listed. It

²⁰ See email to Defendants Dated Jan 11, 2023 and Chase banking records showing payments to Ytel, document 90, Exhibit E and E1

is illogical to suggest that Plaintiff is seeking this information and is simply misleading and lying to the court to suggest otherwise.

59. A review of the Chase banking records from the original Texas case don't show a single congregant's name, address or phone number or any identifying information about congregants and yet despite being provided with these records months prior in discovery. The Defendants lie to the court claiming congregant's information will be disclosed in bank records, when they know this is objectively false and have been provided with proof to the contrary²¹. The bank records DO show \$50,000 in payments to a robocalling platform over several months, prove the defendants are willing to lie under oath in written discovery, and lie to conceal the facts about their robocalling operation.

60. Plaintiff's subpoenas were directed to obtain evidence of payments to Prankdial other carriers that placed harassing and death threats towards the Plaintiff and other robocalling platforms as were shown before in the first Texas lawsuit.

61. Plaintiff has been subjected to death threats after the filing of this lawsuit by the Defendants and is in the process of moving for his personal security. This is objectionable and sanctionable conduct by the Defendants.

Defendant's have suffered no prejudice in this case.

62. The defendant's nor their congregants have suffered no prejudice in this case.

63. Plaintiff has never obtained or sought any information on congregants and that claim is without any evidentiary support or merit.

²¹ See Document 90 exhibit E generally and email dated Jan 11, 2023

64. Similarly, the defendants have suffered no prejudice in this case and don't allege any prejudice in their motion. Plaintiff has not used their banking records or even obtained them in this current case. Plaintiff's seeking of these records is reasonable as evidence of phone calls they placed was previously present in these records and as the prior lawsuit shows, the defendants are more than willing to lie and commit perjury in the ordinary course of discovery.
65. The court should be on notice of the Defendant's lengthy criminal history including a record of violence and fraud.



Craig Cunningham
Plaintiff,

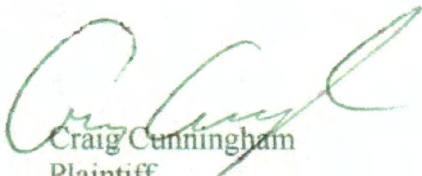
Craig Cunningham, Plaintiff, Pro-se 3000 Custer Road, ste 270-206, Plano, Tx 75075

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA**

CRAIG CUNNINGHAM, Plaintiff,	§
v.	§
Manasseh Jordan Ministries, Inc., Bullion Fitness Inc., Kingdom Ministries Church, Inc., Yakim Manasseh Jordan, aka Manasseh Jordan, MJ Ministries Spreading the Gospel, Inc., Steven Sledge, Aaron Jordan, Naomi Cook, John/Jane Does 1-5	§ 1:22-cv-1419
Defendant	§

Plaintiff's Certificate of Service

I hereby certify a true copy of the foregoing was mailed and emailed to the Defendants and attorney of record in this case.


Craig Cunningham
Plaintiff,

Craig Cunningham, Plaintiff, Pro-se 3000 Custer Road, ste 270-206, Plano, Tx 75075

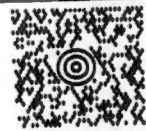
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SUITE 100
4100 WEST EL DORADO PARKWAY
MCKINNEY TX 75070-4838

1.4 LBS LTR 1 OF 1
SHIP WT: 3 LBS
DATE: 13 MAR 2024

SHIP UNITED STATES COURTHOUSE
TO: RICHARD B. RUSSELL FEDERAL BLDG
STE 2211
75 TED TURNER DR SW

ATLANTA GA 30303-3318



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