

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Case No. 3:22-00327
[1] CHESTER GALLAGHER	)	Hon. Aleta A. Trauger
[2] HEATHER IDONI	)	
[3] CALVIN ZASTROW	)	
[4] COLEMAN BOYD	)	
[6] PAUL VAUGHN	)	
[7] DENNIS GREEN	)	

Consent Motion Pursuant to Presidential Pardon

On January 23, 2025, President Donald J. Trump issued an Order granting, *inter alia*, defendants Gallagher, Idoni, C. Zastrow, Boyd, Vaughn, and Green full and unconditional pardons for their convictions in this matter. Attachment A.

Because these defendants' convictions have now been vacated by the Sixth Circuit and remanded to this Court, Federal Rule of Criminal Procedure 48(a) is the appropriate procedural mechanism to comply with the President's Order. *See, e.g., United States v. Watts*, 422 U.S. 1032, 1032 (1975) ("Upon representation of the Solicitor General set forth in his brief for the United States filed May 2, 1975, judgment vacated, and case remanded to the United States District Court for the Northern District of Georgia to permit the Government to dismiss charges against petitioner."); *Bronsozian v. United States*, No. 19-6220, 2020 WL 1906543, at *1 (U.S. Apr. 20, 2020) ("Judgment vacated, and case remanded to the United States Court of Appeals for the Ninth Circuit for further consideration in light of the pending application to vacate the judgment and dismiss the indictment."). Accordingly, the Government moves this Court to dismiss the

Indictment and charges against the defendants with prejudice upon the Sixth Circuit's issuance of the mandate.

Counsel for the defendants consent to this motion.

Respectfully submitted,

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CERTIFICATE OF THE SERVICE

I certify that a true and correct copy of the foregoing was filed electronically and served electronically upon counsel for the defendants, via the CM/ECF electronically filing system on this 5th day of March, 2025.

s/ Wilfred T. Beaye, Jr.
Wilfred T. Beaye, Jr.
Trial Attorney