

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 24-10007-MJJ
	)	
ADIANA PIERRE,	)	
	)	
Defendant.	)	
_____	)	
	)	
FIRST CITIZENS NATIONAL BANK,	)	
	)	
Petitioner.	)	
_____	)	

UNITED STATES’ MOTION FOR FINAL ORDER OF FORFEITURE
(2018 PORSCHE MACAN WITH VIN WP1AA2A52JLB08044)

The United States of America, by its attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, respectfully moves this Court for the issuance of a Final Order of Forfeiture in the above-captioned case pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1), and Rule 32.2(c) of the Federal Rules of Criminal Procedure. A proposed Final Order of Forfeiture is submitted herewith. In support thereof, the United States sets forth the following:

1. On June 7, 2024, in connection with the charges against Adiana Pierre (the “Defendant”), this Court issued a Preliminary Order of Forfeiture against the following property, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1), and Rule 32.2(b)(2) of the Federal Rules of Criminal Procedure:

(a) A Porsche Macan with VIN WP 1AA2A52JLB08044, registered to ADIANA PIERRE and seized on January 25, 2023, from Lookout Mountain, TN; (the “Porsche”). *See* Docket No. 80.

2. Notice of the Preliminary Order of Forfeiture was sent to all interested parties

and published on the government website www.forfeiture.gov for thirty (30) consecutive calendar days, beginning on March 6, 2025 and ending on April 4, 2025. *See* Docket Nos. 109 and 110.

3. Subsequently, petitioner First Citizens National Bank (the “Petitioner”), through its Vice President of Special Assets, contacted the United States and asserted its interest in the Porsche, as a result of a Certificate of Title, a Noting of Lien for the Vehicle, a Promissory Note, and a Commercial Security Agreement. In the submission, the Petitioner stated that it was “not aware of any wrong-doing by [the Defendant] when this loan was made,” that the amount financed was \$40,621.00, and that the unpaid principal due at the time of seizure was \$33,449.22. The United States construes this submission as a request for a hearing to adjudicate the validity of its alleged interest in the property under 21 U.S.C. § 853(n)(2) and (3).

4. The United States and the Petitioner (the “Parties”) now desire to reach a full and final settlement of this matter as to the Porsche.

5. Pursuant to the terms of the Settlement Agreement, attached here to as Exhibit A and incorporated herein, the Parties agree that upon the sale of the Porsche by the United States, and pursuant to the Final Order of Forfeiture, the United States shall pay to the Petitioner, via its attorney or as otherwise directed by the Petitioner, from the net proceeds of the sale, after payment of the reasonable expenses incurred by the United States in connection with its custody and sale of the Porsche, after payment of any taxes owed as a result of such custody or sale,¹ after payment of any outstanding expenses necessary to sell the Porsche, and less any debt that the Petitioner owes to the United States, or any agency of the United States, or any debt that the

¹ Tax liability accrues until the United States takes title through a Final Order of Forfeiture.

United States is authorized to collect from the Petitioner, the following:

- a. unpaid principal due and owing under the Promissory Note and Commercial Security Agreement;
- b. accrued interest at the base contractual rate (not the default rate), to the date of payment; and
- c. any escrow advances and/or other fees and costs properly chargeable to the Promissory Note and Commercial Security Agreement.

6. No other claims of interest in the Porsche have been filed with the Court or served on the United States Attorney's Office, and the time within which to do so has expired.

7. WHEREFORE, the United States requests that this Court enter a Final Order of Forfeiture against the Porsche in the form submitted herewith.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney,

By: /s/ Annapurna Balakrishna
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Dated: November 21, 2025