



U.S. Department of Justice

United States Attorney
Southern District of Florida

99 N.E. 4 Street
Miami, FL 33132
Telephone (305) 961-9007
Facsimile (305) 536-4089

March 21, 2024

VIA FEDERAL EXPRESS

Fed Ex # 775640791251

Elite Motor Cars of Miami
5700 NW 27th Avenue
Miami, Florida 33142

Re: Notice of Forfeiture in: *United States v. Andre Lorquet*
Criminal Case No.: 22-CR-20326-KMM

To Whom It May Concern:

The U.S. District Court for the Southern District of Florida has ordered that certain property in the above-referenced criminal case be forfeited to the United States. The enclosed published Notice of Forfeiture and Preliminary Order of Forfeiture describe the forfeited property and the procedure for filing a petition to claim any of the forfeited property. By receipt of this letter, you are on actual notice of the forfeiture and of your right to assert a claim. This letter is not intended to imply that the United States believes that you have a valid claim to any of the forfeited property.

The procedure for filing a claim is set forth more fully in 21 U.S.C. § 853(n). Under 21 U.S.C. § 853(n)(2), a person must file a petition in the criminal case claiming forfeited property within thirty (30) days of the receipt of this letter or within 60 days of the first date of publication of the Notice of Forfeiture, whichever is earlier.

Sincerely,

Gabrielle Raemy Charest-Turken

G. Raemy Charest-Turken
Assistant United States Attorney
Telephone: 305-961-9365
Gabrielle.Charest-Turken@usdoj.gov

Enclosures: (1) Published Notice on Forfeiture (2) Preliminary Order of Forfeiture

GCT/ec

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
COURT CASE NUMBER: 22-CR-20326-MOORE; NOTICE OF FORFEITURE**

Notice is hereby given that on February 23, 2023, in the case of U.S. v. ANDRE LORQUET, Court Case Number 22-CR-20326-MOORE, the United States District Court for the Southern District of Florida entered an Order condemning and forfeiting the following property to the United States of America:

One (1) 2022 Tesla Plaid, VIN# 5YJSA1E66NF460071. (22-ICE-002552)

Approximately \$100,358.73 in insurance proceeds from Coast National Insurance for one (1) 2019 Porsche Panamera GTS, VIN# WP0AG2A77KL139387. (22-ICE-002976)

\$108,050.65 in U.S. currency in Bank of America account number 8981 0729 7999 in the name of The B Murray Group LLC. (23-ICE-002518)

The United States hereby gives notice of its intent to dispose of the forfeited property in such manner as the United States Attorney General may direct. Any person, other than the defendant(s) in this case, claiming interest in the forfeited property must file an ancillary petition within 60 days of the first date of publication (March 21, 2024) of this Notice on this official government internet web site, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n)(1). The ancillary petition must be filed with the Clerk of the Court, 400 North Miami Avenue, Room 8N09, Miami, FL 33128, and a copy served upon Assistant United States Attorney Gabrielle Raemy Charest-Turken, 99 N.E. 4th Street, Miami, FL 33132. The ancillary petition shall be signed by the petitioner under penalty of perjury and shall set forth the nature and extent of the petitioner's right, title or interest in the forfeited property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the forfeited property and any additional facts supporting the petitioner's claim and the relief sought, pursuant to 21 U.S.C. § 853(n).

Following the Court's disposition of all ancillary petitions filed, or if no such petitions are filed, following the expiration of the period specified above for the filing of such ancillary petitions, the United States shall have clear title to the property and may warrant good title to any subsequent purchaser or transferee.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. See 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition for remission need not be made in any particular form and may be filed online

or in writing. You should file a petition for remission not later than 11:59 PM EST 30 days after the date of final publication of this notice. See 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition for remission form that may be mailed and the link to file a petition for remission online. If you cannot find the desired assets online, you must file your petition for remission in writing by sending it to Assistant United States Attorney Gabrielle Raemy Charest-Turken, 99 N.E. 4th Street, Miami, FL 33132. This website provides answers to frequently asked questions (FAQs) about filing a petition for remission. You may file both an ancillary petition with the court and a petition for remission or mitigation.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:22-cr-20326-KMM

UNITED STATES OF AMERICA,

v.

ANDRE LORQUET,

Defendant.

ORDER

THIS CAUSE came before the Court upon the Government's Motion for Preliminary Order of Forfeiture. ("Mot.") (ECF No. 51). Therein, the Government requests this Court's entry of preliminary order for a forfeiture money judgment in the amount of \$329,195.00, as well as the forfeiture "of certain property in satisfaction thereof, including but not limited to: \$92,000 in Bank of America account number 8981 0729 7999 in the name of The B Murray Group; one (1) 2022 Tesla Plaid, VIN# 5YJSA1E66NF460071; and approximately \$100,358.73 in insurance proceeds for one (1) 2019 Porsche Panamera GTS, VIN# WP0AG2A77KL139387." *Id.* at 1. Defendant does not oppose the Government's motion. *Id.* at 7.

UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is hereby ORDERED AND ADJUDGED that the Motion (ECF No. 51) is GRANTED. It is further ORDERED that:

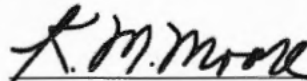
1. Pursuant to 18 U.S.C. § 982(a)(1), 21 U.S.C. § 853, and Rule 32.2 of the Federal Rules of Criminal Procedure, a forfeiture money judgment in the amount of \$329,195 is hereby entered against the Defendant.

2. Pursuant to 18 U.S.C. § 982(a)(1), the following specific property is hereby forfeited and vested in the United States of America, and should be forfeited to satisfy the forfeiture money judgment:
 - a. Approximately \$92,000 in U.S. currency in Bank of America account number 8981 0729 7999 in the name of The B Murray Group LLC.
3. Pursuant to 21 U.S.C. § 853(p), the following substitute property is hereby forfeited and vested in the United States of America, and should be forfeited to satisfy the forfeiture money judgment:
 - a. One (1) 2022 Tesla Plaid, VIN# 5YJSA1E66NF460071; and
 - b. Approximately \$100,358.73 in insurance proceeds from Coast National Insurance for one (1) 2019 Porsche Panamera GTS, VIN# WP0AG2A77KL139387.
4. Any duly authorized law enforcement agency may seize and take possession of the forfeited property according to law.
5. The United States shall send and publish notice of the forfeiture in accordance with Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n).
6. The United States is authorized to conduct any discovery that might be necessary to identify, locate, or dispose of forfeited property, and to resolve any third-party petition, pursuant to Rule 32.2(b)(3), (c)(1)(B) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(m).
7. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Order is final as to the Defendant.
8. The Court shall retain jurisdiction in this matter for the purpose of enforcing this Order, and pursuant to Rule 32.2(e)(1) of the Federal Rules of Criminal Procedure, shall amend

this Order, or enter other orders as necessary, to forfeit additional specific property when identified.

It is further ORDERED that upon adjudication of all third-party interests, if any, the Court will enter a final order of forfeiture as to the property in which all interests will be addressed. Upon notice from the United States that no claims have been filed within 60 days of the first day of publication or within 30 days of receipt of notice, whichever is earlier, then, pursuant to Rule 32.2(c)(2) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n)(7), this Order shall become a Final Order of Forfeiture and any duly authorized law enforcement agency shall dispose of the property in accordance with applicable law.

DONE AND ORDERED in Chambers at Miami, Florida, this 23rd day of February, 2023.



K. MICHAEL MOORE
UNITED STATES DISTRICT JUDGE

c: All counsel of record

ORIGIN ID:MPBA (305) 961-3355
 G. RAEMY CHAREST-TURKEN
 UNITED STATES ATTORNEY'S OFFICE
 99 NE 4TH STREET
 7TH FLOOR
 MIAMI, FL 33132
 UNITED STATES US
 SHIP DATE: 21MAR24
 ACTWGT: 1.00 LB
 CAD: 10854509/NET/4535
 BILL SENDER

TO ELITE MOTOR CARS OF MIAMI

5700 NW 27TH AVENUE

MIAMI FL 33142

(000) 000-0000

REF:

PO:

DEPT:



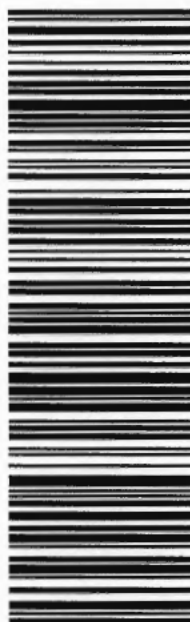
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TRK# 7756 4079 1251

FRI - 22 MAR 5:00P
 STANDARD OVERNIGHT

3CCTYA

33142
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March 25, 2024

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Signed for by:	B.LORA	Delivery Location:	
Service type:	FedEx Standard Overnight		
Special Handling:	Deliver Weekday		MIAMI, FL,
		Delivery date:	Mar 22, 2024 10:42

Shipping Information:

Tracking number:	775640791251	Ship Date:	Mar 21, 2024
		Weight:	0,5 LB/0,23 KG
Recipient:		Shipper:	
MIAMI, FL, US,		MIAMI, FL, US,	

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