

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

CARL DELANO TORJAGBO A/K/A  
KARL LUCIUS DELANO

Criminal Action No.

1:22-cr-00171

**BILL OF PARTICULARS**

The United States of America, by Ryan K. Buchanan, United States Attorney, and Cynthia B. Smith, Assistant United States Attorney for the Northern District of Georgia, hereby files this Bill of Particulars to add the following property to the forfeiture provision of the above-captioned Indictment:

**1. TRAILERS**

- A. 2005 Lufkin Trailer; VIN 1L01A532551155058.
- B. 2006 Lufkin Trailer; VIN 1L01A532661158830.
- C. 2006 Stoughton Trailer; VIN 1DW1A53266E813912.
- D. 2001 Hyundai Trailer; VIN 3H3V532CX1T094105.
- E. 2001 Hyundai Trailer; VIN 3H3V532C61T094022.
- F. 1999 Wabash Trailer; VIN 1JJV532W3XL542560D.
- G. 2006 Wabash Trailer; VIN 1JJV532W96L024192.
- H. 2006 Lufkin Trailer; VIN 1L01A532461158826.
- I. 2004 Strick Trailer; VIN 1S12E95324E497850.

**2. VEHICLES**

- A. 2017 Mack CXU Truck; VIN 1M1AW09Y6HM082042.

- B. 2017 Inter Prostar Truck; VIN 3HSDJAPR6HN411924.
- C. 2015 Mack CXU613 Truck; VIN 1M1AW09Y6FM043206.
- D. 2015 International Lonestar Tri-axle Truck; VIN 3HSCXAPT1FN643060.
- E. 2016 International Prostar Truck; VIN 3HSDJAPR0GN001666.
- F. 2014 International Prostar Truck; VIN 3HSDJAPT8EN795129.
- G. 2014 International Prostar Truck; VIN 3HSDJSNR2EN123578.
- H. 2016 International Prostar Truck; VIN 3HSDJAPRXGN001805.
- I. 2016 International Prostar Truck; VIN 3HSDJAPRXGN001710.
- J. 2015 Kenworth Truck; VIN 1XKYP40X2FJ437668.
- K. 2013 International Truck; VIN 3HSCXSJR1DN157056.
- L. 2021 Land Rover Range Rover Velar Sports Utility Vehicle; VIN SALYM2FU7MA302651.
- M. 2022 BMW M850XI Sedan; VIN WBAGV8C06NCH96608.
- N. 2014 Lamborghini Aventador; VIN ZHWUC1ZD3ELA02216.

### **3. BANK ACCOUNTS**

- A. \$165,192.83 in funds from Bank Account Number XXXX1199 held in the name of FlyingJack Freight & Logistics LLC at Bank of America, Atlanta, Georgia.
- B. \$1,141.89 in funds from Bank Account Number XXXX9499 held in the name of Kremkov Industries at PNC Bank, Atlanta, Georgia.
- C. \$12,781.71 in funds from Bank Account Number XXXX9814 held in the name of Carl Torjagbo at PNC Bank, Atlanta, Georgia.

- D. \$9,367.18 in funds from Bank Account Number XXXX9822 held in the name of Carl Torjagbo at PNC Bank, Atlanta, Georgia.
- E. \$1,750,018.12 in funds from Bank Account Number XXXX9849 held in the name of Carl Torjagbo at PNC Bank, Atlanta, Georgia.
- F. \$51,000.00 in funds from City National Bank of Florida account number XXXX9736 in the name of Reel Deal Yachts, Inc.

#### **4. REAL PROPERTY**

- A. Real Property located at 5114 Greythorne Lane, Marietta, Georgia 30068 and more particularly described as:

All that tract or parcel of land lying and being in Land Lot 165 of the 1<sup>st</sup> District, 2<sup>nd</sup> Section of Cobb County, Georgia, being Lot 11, Brookshyre Manor, as per plat recorded in Plat Book 217, Page 51, as revised plat recorded in Plat Book 246, Page 77, Cobb County, Georgia Records, which plat is incorporated herein by this reference and made a part of this description.

- B. Real Property located at 101 Holt Drive, Acworth, Georgia 30101 and more particularly described as:

All that tract or parcel of land lying and being in Land Lot 1274 of the 21<sup>st</sup> District, 2<sup>nd</sup> Section, Cherokee County, Georgia, being Lot 1, Holt-Priest Industrial Park, as per plat recorded in Plat Book 78, Pages 36-37, Cherokee County, Georgia Records, which plat is incorporated herein and made a part hereof by this reference and made a part of this description.

- C. Tract 4 Fiber Drive, Cartersville, Georgia 30120 [No legal description recorded with the Bartow County Real Estate Records.]

**[signature on following page]**

Respectfully Submitted,

Ryan K. Buchanan  
United States Attorney

/s/ Cynthia B. Smith  
CYNTHIA B. SMITH  
Assistant United States Attorney  
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**Certificate of Service**

I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

July 7, 2022

/s/ CYNTHIA B. SMITH  
CYNTHIA B. SMITH  
Assistant United States Attorney