

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-171-MLB-RDC

BILL OF PARTICULARS

The United States of America, by Richard S. Moultrie, Jr., Acting United States Attorney, and Nicholas L. Evert, 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 Superseding Indictment:

1. VEHICLES

- a) 2022 BMW M850 XI bearing VIN WBAGV8C06NCH96608.
- b) 2021 Land Rover Range Rover Velar Sports Utility Vehicle; VIN SALYM2FU7MA302651.
- c) 2014 Laborghini Aventador; VIN ZHWUC1ZD3ELA02216.

2. BANK ACCOUNTS

- a) \$1,141.89 in funds from Bank Account Number ending 9499 held in the name of Kremkov Industries at PNC Bank, Atlanta, Georgia

b) \$1,750,018.12 in funds from Bank Account number ending 9849 held in the name of Carl Torjagbo at PNC Bank, Atlanta, Georgia.

Respectfully submitted,

RICHARD S. MOULTRIE, JR.
Acting United States Attorney

/s/NICHOLAS L. EVERT
Assistant United States Attorney
Georgia Bar No. 1672511
Nicholas.Evert@usdoj.gov