

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

UNITED STATES OF AMERICA,:

Plaintiff, :

v. :

CASE NO.

: 1:22-cr-00171-MLB-RDC-1

CARL DELANO TORJAGBO, :
a/k/a KARL LUCIOUS DELANO,:

Defendant. :

DEFENSE RESPONSE CONTESTING THE
GOVERNMENT’S MOTION FOR PRELIMINARY
ORDER OF FORFEITURE

COMES NOW CARL DELANO TORJAGBO, a/k/a KARL
LUCIUS DELANO, by and through undersigned counsel and
files this Response Contesting the Government’s Motion for
Preliminary Order of Forfeiture (Doc. 253) and shows as follows:

1.

Mr. Delano plead not guilty to the ten-count third Superseding Indictment. (Doc. 198). Mr. Delano proceeded to trial on July 21, 2025. (Doc. 218). On July 25, 2025 the jury returned a verdict of guilty on all counts. (Doc. 226). Sentencing is currently scheduled for January 27, 2026. Mr. Delano maintains his innocence of the charges and objects, pursuant to Federal Rule of Criminal Procedure Rule 32.2 (b) to the forfeiture of his property, real property and request for a forfeiture money judgment.

2.

Mr. Delano asserts the vehicles listed in the Government's Motion, to wit: the 2022 BMW M850xi; the 2021 Land Rover Range Rover Lelar Sports Utility Vehicle; and the 2014 Lamborghini Aventador; are not subject to criminal forfeiture because the Government has not established the requisite nexus

between the subject vehicle property and the alleged offense as required under Federal Rule of Criminal Procedure 32.2 (a).

3.

Mr. Delano asserts the real property listed in the Government's Motion, to wit: 5114 Greythorne Lane, Marietta, Cobb County, Georgia 30068, and all buildings and appurtenances thereto; 101 Holt Drive, Acworth, Cherokee County, Georgia 30101, and all buildings and appurtenances thereto; and Tract Fiber Drive, Cartersville, Bartow County, Georgia 30120, and all buildings and appurtenances thereto; are not subject to criminal forfeiture because the Government has not established the requisite nexus between the subject real property and the alleged offense as required under Federal Rule of Criminal Procedure 32.2 (a).

4.

Mr. Delano further objects to the Government's request for a preliminary order of forfeiture a forfeiture money judgement in the amount of \$6,366,240.76 and asserts the evidence at trial did not show the requisite nexus between the subject funds and the alleged offense as required under Federal Rule of Criminal Procedure 32.2 (a).

5.

Pursuant to Federal Rule of Criminal Procedure 32.2 (b), Mr. Delano respectfully requests this matter be set down for an evidentiary hearing to determine whether the Government has met its burden under Federal Rule of Criminal Procedure 32.2.

WHEREFORE, for the above and foregoing reasons, Mr. Delano objects to and contests the Government's request for a preliminary order of forfeiture and respectfully requests this Court conduct an evidentiary hearing on this matter.

This 21st day of January, 2026.

Respectfully submitted,

s/Sandra Michaels

SANDRA MICHAELS

Attorney for Carl Delano Torjagbo

Georgia Bar No. 504014

965 Virginia Ave, N.E.

Atlanta, Georgia 30306

(404) 312-5781

SLMichaelsLaw@gmail.com

CERTIFICATE OF SERVICE

Undersigned counsel has served the forgoing **Defense Response Contesting the Government's Motion for Preliminary Order of Forfeiture** today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

This 21st day of January, 2026.

s/Sandra Michaels

SANDRA MICHAELS

Attorney for Carl Delano Torjagbo

Georgia Bar No. 504014

965 Virginia Ave, N.E.

Atlanta, Georgia 30306

(404) 312-5781

SLMichaelsLaw@gmail.com