

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,	:	
	:	
Defendant.	:	

MOTION FOR A STAY OF THE FORFEITURE ORDER
PENDING THE APPEAL

Appellant CARL DELANO TORJAGBO, by and through undersigned counsel, hereby files this Motion for a Stay of the Forfeiture Order Pending Appeal pursuant to Federal Rule of Appellate Procedure 8(a)(1), and shows in support as follows:

1.

On January 15, 2026, the Government filed a Motion for Criminal Forfeiture (Doc. 253). On January 21, 2026, Appellant objected to the Government's Motion for Forfeiture. (Doc. 257). On January 27, 2026, a

hearing was conducted. (Doc. 258). On January 30, 2026, an Order was entered, granting the Government's Motion. (Doc. 260).

2.

Appellant shows that there is a likelihood he will prevail on the merits of the appeal in that he had no fraudulent intent to defraud the United States Government or Chase Bank. Additionally, there is no proper nexus between the criminal acts alleged and the forfeited property and the property is not properly subject to forfeiture.

3.

There will be irreparable harm to Appellant if the Government sells the property in that not only will he lose substantial financial equity in the property, but it will be difficult if not impossible to regain the property after the conclusion of this appeal.

4.

The Government cannot show there will be substantial harm to other interested persons if this Stay is granted by this Court.

5.

The Government cannot show there is substantial harm to the public interest if this Stay is granted by this Court.

WHEREFORE, for the above and foregoing reasons, Mr. Torjagbo respectfully requests this Court grant a Stay of the Forfeiture Order Pending Appeal.

This 2nd day of April, 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 **Motion for a Stay of the Forfeiture Order Pending the Appeal** today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

This 2nd day of April, 2026.

s/Sandra Michaels
SANDRA MICHAELS
Attorney for Carl Torjagbo
Georgia Bar No. 504014
965 Virginia Ave, N.E.
Atlanta, Georgia 30306
(404) 312-5781
SLMichaelsLaw@gmail.com