

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

UNITED STATES OF AMERICA

v.

CASE NO. 4:22-cr-32-MW/MAF

**FELICIA TIFFANY JACKSON-STANLEY
AND
WILBERT J. STANLEY III**

**GOVERNMENT'S MOTION FOR
PRELIMINARY ORDER OF FORFEITURE**

The United States of America, by and through the United States Attorney for the Northern District of Florida, respectfully moves this Court pursuant to Federal Rules of Criminal Procedure, Rule 32.2(b) for the issuance of a Preliminary Order of Forfeiture in the above-styled criminal matter against the following property:

- A. Real property located and situated in Leon County, Florida, located at 1660 Kay Avenue, Units 1,2,3,4,5,6,7,and 8, Tallahassee, FL 32301, and all areas designated as common elements of Greenside Condominiums, further described in Leon County Official Records Book 5470 and Page 79, and known to the Leon County Property Appraiser as Parcel Identification #s 3108360000010, 3108360000020, 3108360000030, 3108360000040, 3108360000050, 3108360000060, 3108360000070, 3108360000080, respectively.**
- B. Real property located and situated in Leon County, Florida: Lot 10, Block C, Tallahassee Ranch Club, according to the plat thereof, recorded in Plat Book 18, Page(s) 1 through 35, of the inclusive, Public Records of Leon County, Florida, and further described in Leon County Official Records Book 5496 and Page 1308, and known to the Leon County Property Appraiser as Parcel Identification # 332525**

C0100.

- C. Real property located and situated in Leon County, Florida, located at 3770 Laurel Trace Way, Tallahassee, FL 32303, described as: Lot 6, Block D of Laurel Trace, According to the Plat thereof as Recorded in Plat Book 16, Page 75, of The Public Records of Leon County, Florida, and further described in Leon County Official Records Book 5510 and Page 39, and known to the Leon County Property Appraiser as Parcel Identification #210929D0060.**
- D. The Coinbase account with user identification number ending in 9b775ae, held in the name of WILBERT STANLEY and/or associated with email address yepwekan@gmail.com.**
- E. The Coinbase account with user identification number ending in 8d710141, held in the name of FELICIA STANLEY and/or associated with email address liciapooh01@hotmail.com.**
- F. The Robinhood account ending in 2819, held in the name of FELICIA STANLEY.**
- G. The Robinhood account ending in 1939, held in the name of WILBERT STANLEY.**
- H. The TD Ameritrade account ending in 1466, held in the name of FELICIA JACKSON-STANLEY.**

1. On June 17, 2022, an Information was filed against the Defendants, charging them both in Count One with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1343; in Count Two with money laundering conspiracy, in violation of Title 18, United States Code, Section 1956(h); and in

Count Three¹ or Count Four² with making false statements, in violation of Title 18, United States Code, Section 1001. (ECF Doc. 1)

2. The Information included a criminal forfeiture provision pursuant to Title 18, United States Code, Sections 982(a)(1) and 982(a)(2), and Title 28, United States Code, Section 2461(c), that put the Defendants on notice that the United States would seek to forfeit the above-described property as property constituting and derived from proceeds traceable to offenses described in Counts One, Three, and Four, or as property involved in the offense alleged in Count Two, of the Information. (*Id.*)

3. On July 29, 2022, the Defendants pled guilty to all four counts of the Information. As part of their guilty pleas, the Defendants agreed that their sentences included the forfeiture of all forfeitable assets which included the above-described property.³ (ECF Docs. 24-25 at pgs. 2-3)

4. For the reasons stated above, the United States requests that the Court forfeit to the United States the above-described property and further requests that,

¹ Defendant Felicia Jackson-Stanley was charged in Count Three.

² Defendant Wilbert Stanley III was charged in Count Four.

³ The Government has agreed that it will not proceed with forfeiture of the assets listed in the Plea Agreements if the Defendants pay restitution described in the Plea Agreement in full prior to sentencing in this case. To date, no known restitution has been paid by the Defendants. Prior to seeking a Final Order of Forfeiture, the undersigned will consult with defense counsel to confirm that no restitution has been paid by the Defendants; if at that time restitution has been paid in full, then the Government will move to vacate the Preliminary Order of Forfeiture it seeks herein.

the order of forfeiture become final as to the Defendants at sentencing.

5. Upon issuance of a Preliminary Order of Forfeiture, the United States will publish notice of this Order on the Government's official Internet website, www.forfeiture.gov, and will send direct notice to any person, other than the defendants, having or claiming a legal interest in the property, advising such person of his or her right to file a petition contesting the forfeiture in accordance with Title 21, United States Code, Section 853(n) and Rule 32.2(c). This notice will state that the petition shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the property, 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 and any additional facts supporting the petitioner's claim and the relief sought.

6. In accordance with the Title 18, United States Code, Sections 982(a)(1) and 982(a)(2), and Title 28, United States Code, Section 2461(c), and Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States requests that it be permitted to seize the specific property subject to forfeiture whether held by the defendants or a third party, and to undertake whatever discovery is necessary to identify, locate or dispose of the property subject to forfeiture, or substitute assets for such property.

7. As required by Federal Rule of Criminal Procedure 32.2(b)(4), the

United States requests that the Court include the forfeiture when orally pronouncing the sentences and in the judgments.

8. The United States further requests that the Court retain jurisdiction to address any third-party claim that may be asserted in these proceedings, and to enter any further order necessary for the forfeiture and disposition of such property.

9. A proposed Preliminary Order of Forfeiture will be submitted for the Court's consideration.

WHEREFORE, the United States respectfully requests entry of a Preliminary Order of Forfeiture for the above-described property.

Dated this 28th day of November, 2022.

Respectfully submitted,

JASON R. COODY
United States Attorney

/s/ **Justin M. Keen**

JUSTIN M. KEEN
Assistant United States Attorney
Florida Bar Number: 021034
111 North Adams Street, Fourth Floor
Tallahassee, FL 32301
Justin.Keen@usdoj.gov
(850) 942-8430

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(F)

I hereby certify, pursuant to N.D. Fla. Loc. R. 7.1(f), that this filing complies with the word limit and contains 1,095 words. This response was prepared using Microsoft Word 2016 software. In making this certification, I have relied upon the word-count feature of Microsoft Word 2016.

/s/ Justin M. Keen
JUSTIN M. KEEN
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed via the Court's CM/ECF system on this 28th day of November, 2022, which will send notification of such filing to all counsel of record.

/s/ Justin M. Keen
JUSTIN M. KEEN
Assistant United States Attorney