

**IN THE UNITED STATES DISTRICT COURT
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,**

Defendants.

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PRELIMINARY ORDER OF FORFEITURE

THIS CAUSE CAME ON before the Court on the Motion of the United States of America for a Preliminary Order of Forfeiture. ECF No. 40. Being fully advised in the premises, the Court finds:

WHEREAS, 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; and

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

² Defendant Wilbert Stanley III was charged in Count Four.

WHEREAS, the Indictment included a criminal forfeiture provision pursuant Title 18, United States Code, Sections 982(a)(1) and 982(a)(2), and Title 28, United States Code, Section 2461(c); and

WHEREAS, 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,³ and includes:

- 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,**

³ In the Plea Agreements, 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 Agreements in full prior to sentencing in this case. In its motion, the Government represents that, to date, no known restitution has been paid by the Defendants. Prior to seeking a Final Order of Forfeiture, the Government shall consult defense counsel to confirm that no restitution has been paid by the Defendants. If at that time it is determined that restitution has been paid in full, then the Government shall move to vacate this Preliminary Order of Forfeiture.

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.

WHEREAS, being fully advised in the premises, the Court finds, based on the evidence already in the record and that the above-listed property is subject to forfeiture pursuant to Title 18, United States Code, Sections 982(a)(1) and 982(a)(2), and Title 28, United States Code, Section 2461(c), and that the Government has established the requisite nexus between such property and the offenses to which the Defendants have pled guilty.

Accordingly, it is hereby **ORDERED** that based on the foregoing, the United States' motion, ECF No. 40, is **GRANTED**.

It is **FURTHER ORDERED** that, pursuant 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)(4) of the Federal Rules of Criminal Procedure, the Defendants' interest in the assets identified above is hereby forfeited to the United States for disposition according to law.

It is **FURTHER ORDERED** that, upon the entry of this Order, the United States is authorized to seize the assets above, whether held by the Defendants or by a third party, and to conduct any discovery proper in identifying, locating or disposing of the property subject to forfeiture, in accordance with Federal Rules of Criminal Procedure, Rule 32.2(b)(3).

It is **FURTHER ORDERED** that, upon entry of this Order, the United States is authorized to commence any applicable proceeding to comply with statutes governing third-party rights, including giving notice of this Order.

It is **FURTHER ORDERED** that, in accordance with the law, the United States shall cause to be published at least once, notice of this Order, notice of its intent to dispose of the property in such manner as the Attorney General (or a designee) may direct, and notice that any person, other than the defendants, having or claiming a legal interest in the aforementioned property must file a petition with the Court within thirty (30) days of the final publication of the notice, or within sixty (60) days of the first date of publication on an official internet government forfeiture site at www.forfeiture.gov. The United States may also, to the extent practicable, provide written notice to any person known to have an alleged interest in the above-

described property.

It is **FURTHER ORDERED** that any person, other than the above-named defendants, asserting a legal interest in the above-described property may, within thirty days of the Final Publication of Notice or Receipt of Notice, whichever is earlier, petition the Court for a hearing without a jury to adjudicate the validity of his alleged interest in the subject property, and for an amendment of the Order of Forfeiture, pursuant to Title 28, United States Code, Section 2461(c), which incorporates Title 21, United States Code, Section 853(n).

It is **FURTHER ORDERED** that pursuant to Fed. R. Crim. P. 32.2(b)(4), this Preliminary Order of Forfeiture shall become final as to the Defendants at the time of sentencing, or before sentencing if the Defendant consents, and shall be made part of the sentence and included in the judgment. If no third-party files a timely claim, this Order shall become the Final Order of Forfeiture, as provided by Fed. R. Crim. P. 32.2(c)(2).

It is **FURTHER ORDERED** that any petition filed by a third party asserting an interest in the subject property shall be signed by petitioner under penalty of perjury and shall set forth the nature and extent of the petitioner's right, the title, or interest in the subject property, the time and circumstances of the petitioner's acquisition of the right, title or interest in the subject property, any additional facts supporting the petitioner's claim and the relief sought.

It is **FURTHER ORDERED** that after the disposition of any motion filed under Fed. R. Crim. P. 32.2(c)(1)(A) and before a hearing on the petition, discovery may be conducted in accordance with the Federal Rules of Civil Procedure upon a showing that such discovery is necessary or desirable to resolve factual issues.

It is **FURTHER ORDERED** that the United States shall have clear title to the subject property following the Court's disposition of all third-party interests, or, if none, following the expiration of the period provided in Title 21, United States Code, Section 853(n)(2) (which is incorporated by Title 18, United States Code, Section 982(b)) for the filing of third-party petitions.

It is **FURTHER ORDERED** that the Court shall retain jurisdiction to enforce this Order, and to amend it as necessary, pursuant to Fed. R. Crim. P. 32.2(e).

SO ORDERED on November 29, 2022.

s/Mark E. Walker
Chief United States District Judge