

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

UNITED STATES OF AMERICA

v.

Case No.: 4:22cr32-MW

**FELICIA TIFFANY JACKSON-STANLEY
and
WILBUR JEAN STANLEY, III**

Defendant.

**GOVERNMENT’S RESPONSE TO PETITION OF
AMERICAN COMMERCE BANK, N.A.**

COMES NOW, the United States of America, by and through the undersigned Assistant United States Attorney, and responds to the petition filed by American Commerce Bank, N.A. regarding their interest in Lot 10C on Painted Post Lane in Tallahassee, Florida. (ECF No. 63).

Even though the petition is untimely pursuant to 21 U.S.C. § 853(n)(2), the government does not oppose waiving the defect based on the explanation of the Claimant contained in the petition. (ECF No. 63). The government recognizes the claim of American Commerce Bank for the balance of the note and interest as reflected in Exhibit C of the petition. (ECF No. 63-3).

The Petitioner also requests an unspecified amount of attorney’s fees. (ECF No. 63). The government has reviewed the mortgage documents contained in the

Petitioner's filing and acknowledges the provisions for attorney's fees. (ECF No. 63-1, 63-2). The government has requested the specific amount of attorney's fees which Petitioner is seeking, and has received an estimate of fees, but has not received a final figure yet. Given the lack of specificity regarding attorney's fees, the government reserves the right to object to attorney's fees should the requested fees be unreasonable.

Respectfully submitted,

JASON R. COODY
United States Attorney

/s/ Kaitlin Weiss
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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 383 words. In making this certification, I have relied upon the word-count feature of Microsoft Word.

/s/ Kaitlin Weiss
KAITLIN WEISS
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF on April 4, 2023, for service on all parties herein, and emailed to counsel for the Petitioner Christopher Thompson, Esq. at crthompson@burr.com and mlucca-cruz@burr.com, and Adam Smart, Esq. at asmart@burr.com and jmlewis@burr.com.

/s/ Kaitlin Weiss
KAITLIN WEISS
Assistant United States Attorney