

- b. A 2017 Bentley Model Continental GT, with VIN No. SCBFT7ZA9HC061995 (the “Bentley”).

3. Following the entry of the Preliminary Order of Forfeiture, the Government learned the Defendant had sold the Mercedes.

4. On or about February 16, 2024, the Government received \$48,500 representing the sale proceeds of the Mercedes (the “Mercedes Sale Proceeds”, collectively, with the Bentley, the “Specific Property”).

5. The Notice of Forfeiture and the intent of the Government to dispose of the Mercedes Sale Proceeds was posted on an official government internet site (www.forfeiture.gov) beginning on February 21, 2024, for thirty (30) consecutive days, through March 21, 2024, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court on August 13, 2024 (D.E. 104).

6. The Notice of Forfeiture and the intent of the Government to dispose of the Bentley was posted on an official government internet site (www.forfeiture.gov) beginning on March 15, 2024, for thirty (30) consecutive days, through April 13, 2024, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court on August 13, 2024 (D.E. 105).

7. On or about June 15, 2023, Notice of the Preliminary Order of Forfeiture was sent via certified mail to the following parties:

Chelsea Martinez
c/o Cesar de Castro, Esq.
111 Fulton Street, Suite 602
New York, NY 10038

Carra Wallace
c/o Max Nicholas, Esq.
Spears & Imes LLP
767 3rd Avenue
New York, NY 10017

Louis Green
c/o George B. Donnini, Esq.
Butzel Attorneys and Counselors,
201 West Big Beaver Road, Suite 1200
Troy, MI 48084

(collectively, the “Noticed Parties”).

8. The Defendant and the Noticed Parties are the only individuals and/or entities known by the Government to have a potential interest in the Specific Property.

9. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Specific Property have been filed.

10. Accordingly, the Government requests that the Court enter the proposed Third Final Order of Forfeiture.

11. No previous application for the relief requested herein has been sought.

Dated: New York, New York
August 13, 2024

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: _____/s/_____
Katherine Reilly
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Tel: (212) 637-6521