

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$4,698,514.00 in United States Currency;

\$630,680.00 in United States Currency;

\$2,033,094.98 in Funds Seized from JP
Morgan Chase Account;

\$205,358.00 in Funds Seized from Rago
Wright Account;

KAWS “Close the Door Behind You”
Painting;

Andy Warhol Apple Painting;

Edward Bell’s “David Starts to Make Up for
Scary Monsters” 1980 Polaroid;

Rolex Daytona Chronograph Watch;

Audemars Piquet Oak Offshore
Chronograph Watch;

Patek Philippe Aquanaut Watch;

Rolex Day-Date 36 President Watch;

Rolex “Hulk” Submariner Watch;

Rolex 18K Yellow Gold Datejust Watch
with 36mm case;

Rolex 18K Yellow Gold Datejust Watch
with 26mm case;

Rolex President Day-Date 18k Rose Gold
Watch;

Civil No. 8:24CV160

COMPLAINT FOR FORFEITURE *IN REM*

Platinum and Diamond 3 Stone Ring;
Silver Metal and Diamond 36MM Bezel;

14K White Gold and Diamond Tennis
Bracelet;

Australian Gold Lunar \$100 Coin;

Counterfeit Cartier 18K Love Bracelet;

Hermès Grand Attelage Flatware;

Tiffany & Co. Platinum and Diamond Ring;

Tiffany & Co. 18K Yellow Gold and
Yellow Diamond Ring;

18K Yellow Gold and Diamond Ring;

Art Smith Modernist Brass Necklace;

18K Yellow Gold Necklace;

Art Smith Modernist Brass and Copper Cuff
Bracelet;

Art Smith Modernist Copper Bracelet;

18K Yellow Gold Curb Link ID Bracelet;

Pair of Art Smith Modernist Ear Clips;

Pair of Art Smith Modernist Ear Pendants;

George Nakashima American Black Walnut
Double Settee;

Set of East Indian Laurel Wood Dining
Chairs;

East Indian Laurel Wood Dining Table;

George Nakashima American Black Walnut
Coffee Table;

George Nakashima Seat Lounge Chair;

Pair of Mira Nakashima Grajalas
Nightstands;

George Nakashima Dovetailed Double
Dresser;

Wood Bed Frame;

Arthur Espenet Carpenter II Cabinets;

Arthur Espenet Carpenter II Headboard;

Arthur Espenet Carpenter II Mahogany Slab
Headboard;

Wood Cube Side Table;

Arthur Espenet Carpenter II Mushroom
Chest;

Jean Prouvé Sideboard;

JD Blunk Redword Sculpture;

Isamu Noguchi Kaki-Persimmons
Galvanized Steel;

Isamu Noguchi Messenger 2B Bronze Plate;

George Nakashima Grass Seated Stool;

Sori Yanagi Butterfly Stool;

Perre Jeanneret Teak and Enameled Steel
Stools;

Costa Rican Ceremonial Volcanic Stone
Metate;

Wharton Esherick 2 Ash Chairs;

Axel Einar Hjorth Uto Coffee Table;
Blue Nazca Textile;

Framed Nazca Textile Woven Fabric;

Arthur Espenet Carpenter II Wooden Chest;

Arthur Espenet Carpenter II Low Table;

Native American Stone Tool with Incised
Features;

Native American Stone Tool with Long
Implement;

George Nelson Pill Clock;

Charles Eames Child's Chair;

Isamu Nogushi "Rudder" stool;

Greta M. Grossman Cobra Table Lamp;

Eames LTR Side Table;

Arthur Espenet Carpenter II Bookshelf
Cabinets;

Massim Lime Spatula;

Olmec Stone Figure;

Olmec Implement,

Defendants.

The United States of America, for its cause of action against the Defendant property, pursuant to Rule G(2) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, states and alleges as follows:

Nature of the Action

1. This is an action to forfeit property to the United States for violations of 18 U.S.C. §§ 981(a)(1)(A) and (C), and 21 U.S.C. § 881.

The Defendants *in rem*

2. The defendant cash in the amount of \$4,698,314.00 seized on December 12, 2023, and currently in the custody of the Department of Homeland Security, Customs and Border Protection (CBP).
3. The defendant cash in the amount of \$630,680.00 seized on December 12, 2023, and currently in the custody of CBP.
4. The defendant funds in the amount of \$2,033,094.98 from JP Morgan Chase Account XXXX2583 seized on November 8, 2023, and currently in the custody of CBP.
5. The defendant funds in the amount of \$205,358.00 from Rago Wright Account XXX061 seized on December 19, 2023, and currently in the custody of CBP.
6. The defendant art listed below.
 - a. KAWS “Close the Door Behind You” Painting, seized on December 12, 2023, and currently in the custody CBP.
 - b. Andy Warhol Apple Painting, seized on December 12, 2023, and currently in the custody CBP.
 - c. EDWARD BELL (BRITISH) “David Starts to Make Up for Scary Monsters” 1980 Polaroid photograph Signed and titled by the photographer in black ink at lower margin of matte Photograph: 3-1/2 by 3-1/2 inches Overall: 4-3/4 by

6-3/4 inches Framed in black wood frame, float mounted on grey matte, under Plexiglass, seized on December 12, 2023, and currently in the custody CBP.

7. The defendant jewelry listed below.

- a. ROLEX DAYTONA CHRONOGRAPH – 18K Everose™ gold Rolex Daytona, reference #116505, serial #815X7837, features a black chronograph dial with rose gold registers, an oyster bracelet, and a tachymeter bezel. Accompanied by the boxes and the International Warranty card. Two Everose™ gold links and pins are included in the box with the retail hangtags. Item weight: 205.06 gm, seized on December 12, 2023, and currently in the custody CBP.
- b. AP ROYAL OAK OFFSHORE CHRONOGRAPH – 18K rose gold Audemars Piguet Royal Oak Chronograph, reference #25940OK.OO.D002CA.01, serial #G29759, features an anthracite gray chronograph dial with a gold pattern, a black rubberized bezel with stainless steel hexagonal screws, and a black rubber strap with 18K rose gold deployment buckle with integrated AP logo. Item weight: 225.15 gm., seized on December 12, 2023, and currently in the custody CBP.
- c. PATEK PHILIPPE AQUANAUT – 18K rose gold Patek Philippe Aquanaut, reference #5167R, serial #7229022, features an automatic movement with power reserve. The date window is at 3 o'clock on the dark brown grid dial. The grid texture is repeated on the brown rubber strap with 18K rose gold

deployment clasp. Item weight: 120.94 gm, seized on December 12, 2023, and currently in the custody CBP.

- d. ROLEX DAY-DATE 36 PRESIDENT AUTOMATIC 18K YELLOW GOLD BRACELET WATCH - 36mm model, reference no. 118238, serial no. D74N6565, round mother of pearl and diamond dial, sapphire crystal with day and magnified date window, screw down crown, screw down case back, case no. 2098, 18K yellow gold fluted bezel, Rolex caliber 3155 automatic Swiss movement, movement serial no, 36U5F587, 18K yellow gold Rolex President Link bracelet, bracelet code 83208, with “fat buckle” folding clasp, clasp code E3P, 161.9 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- e. A ROLEX “HULK” SUBMARINER DATE STAINLESS STEEL BRACELET WATCH - 40mm model, reference no. 116610LV, serial no. 3U67F120, circular “Hulk” green ceramic dial and bezel, sapphire crystal with magnified window for date and laser-etched Rolex Crown logo, screw down crown, stainless steel Oyster case, case no. 2360, Rolex caliber 3135 automatic Swiss movement with Quickset date, movement serial no. 15W876S2, stainless steel Rolex Oyster bracelet, bracelet code 97200, P4J, with folding Oysterlock clasp, clasp code 200, 148.9 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- f. ONE (1) ROLEX 18K YELLOW GOLD DATEJUST BRACELET WATCH - Automatic mechanical movement, 36mm case, the circular brushed gold dial

stamped “Rolex Oyster Perpetual DateJust Superlative Chronometer Officially Certified T Swiss T”, gold baton numerals, gold hands, magnified date, within a polish gold bezel, to the 18k yellow gold case marked “18K”, and joined to the Oyster bracelet with deployant clasp, with extra links, seized on December 12, 2023, and currently in the custody CBP.

g. ONE (1) ROLEX 18K YELLOW GOLD DATEJUST BRACELET WATCH

- Reference no. 6917, automatic mechanical movement, 26mm case, the circular brown dial stamped “Rolex Oyster Perpetual DateJust Superlative Chronometer Officially Certified T Swiss T”, gold baton numerals, luminescent hands, magnified date, within a fluted gold bezel, to the 18k yellow gold case marked “18K”, and joined to the Oyster bracelet with deployant clasp, with Rolex box and paperwork, seized on December 12, 2023, and currently in the custody CBP.

h. ROLEX PRESIDENT DAY-DATE 18K ROSE GOLD BRACELET

WATCH - 40mm model, reference no. 228235, serial no. 94S529S5, circular chocolate diagonal motif dial with day and date apertures, sapphire crystal with magnified window for date and laser-etched Rolex Crown logo, 18k Everose gold fluted bezel, 18k Everose gold Oyster case, screw-down crown, Rolex automatic Swiss movement with Double Quickset day and date, 18k Everose gold Rolex President bracelet, bracelet code 83415 F2, with concealed folding Crown clasp, clasp code D1J, 195.7 grams total weight., seized on December 12, 2023, and currently in the custody CBP.

- i. A PLATINUM AND DIAMOND THREE (3) STONE RING - Hand fabricated mounting in platinum, centering one (1) 3.00 carat radiant cut diamond, accompanied by GIA Diamond Grading Report (no. 15684500), D color, VVS1 clarity, no fluorescence, flanked by (2) tapered bullet cut diamonds, D-E color and VVS2 clarity, approximately 0.50 carat total weight, marked "PLAT", GIA report number laser inscribed on the diamond's girdle, ring size 4.5, 7.6 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- j. AN AFTERMARKET SILVER METAL AND DIAMOND BEZEL FOR 36MM ROLEX WATCHES - Channel-set with thirty-nine (39) round brilliant cut diamonds, G-H color, SI2-I2 clarity, approximately 3.00 carats total weight, 5.5 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- k. A 14K WHITE GOLD AND DIAMOND TENNIS BRACELET - Containing thirty (30) round brilliant cut diamonds, F color, VVS-VS clarity, approximately 12.00 carats total weight, marked "14K", 6.5 inches in length, 21.1 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- l. A 2015-P 1 OZ. AUSTRALIAN GOLD LUNAR "YEAR OF THE GOAT" \$100 COIN - 1 ounce 0.999 fine gold, \$100 denomination, minted in 2015 at the Australian Perth Mint, 31.1 grams total weight, seized on December 12, 2023, and currently in the custody CBP.

- m. A COUNTERFEIT “CARTIER” 18K YELLOW GOLD AND DIAMOND “LOVE” STYLE BRACELET - Bezel-set with four (4) round brilliant cut diamonds, D-F color, VVS clarity approximately 0.42 carats total weight, marked with counterfeit logo and numbered “©Cartier 16 FNK881 Au750 CSA”, 5.94 mm wide, 29.6 grams total weight, with counterfeit “Cartier” branded screwdriver and box, seized on December 12, 2023, and currently in the custody CBP.
- n. HERMÈS GRAND ATTELAGE 16-PIECE YELLOW GOLD-PLATED STAINLESS-STEEL FLATWARE - Hermès Grand Attelage flatware pieces, sealed in original packaging (with the exception of 1 (one) spoon), each marked “HERMÈS - PARIS”, together in one (1) Hermès box, seized on December 12, 2023, and currently in the custody CBP.
- o. ONE (1) TIFFANY & CO. PLATINUM AND DIAMOND RING - Designed as a platinum band pavé set with thirty (30) circular-cut diamonds, approximately 0.42 carat total weight, F-G color, VS clarity, marked “Tiffany & Co. PT950”, ring size 4, 2 mm wide, 2.34 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- p. ONE (1) TIFFANY & CO. 18K YELLOW GOLD, YELLOW DIAMOND AND DIAMOND RING - Centering upon an old mine cut fancy yellow diamond, approximately 2.70 carats total weight, SI clarity, irregular cut, measuring 9.2 x 9.4 x 4.5 mm, 18k yellow gold mounting channel set with six (6) old European and old mine-cut diamonds, approximately 0.36 carat total

weight, G-I color, SI clarity, marked “Tiffany & Co. OR”, ring size 2.25 (with ball sizer), 3.05 grams total weight , seized on December 12, 2023, and currently in the custody CBP.

- q. ONE (1) 18K YELLOW GOLD AND DIAMOND RING - Centering upon an old European-cut diamond, approximately 3.00 carats total weight, I-J color, SI clarity, measuring 10.2 x 10.3 x 5 mm, 18k yellow gold mounting pavé set with one hundred (100) circular-cut diamonds, approximately 1.08 carats total, G-I color, SI clarity, marked “18k”, ring size 2.25 (with ball sizers), 3.89 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- r. ONE (1) ART SMITH MODERNIST BRASS NECKLACE - Of rigid design, the large brass collar panel, joined by undulating brass wirework detail, to the hook closure, marked “Art Smith”, 14 inches, overall 8-1/7 x 7 inches., seized on December 12, 2023, and currently in the custody CBP.
- s. ONE (1) 18K YELLOW GOLD NECKLACE - Composed of a series of textured 18k yellow gold links, stamped “750” and with Italian marks, 16-3/4 inches, 25.00 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- t. ONE (1) ART SMITH MODERNIST BRASS AND COPPER CUFF BRACELET - Designed as a rigid brass wire cuff of openwork design, further accented by curved copper panels, marked “Art Smith”, overall, 4-1/2 x 3-1/4

x 2-1/2 inches, 2-1/8 inner diameter, seized on December 12, 2023, and currently in the custody CBP.

- u. ONE (1) ART SMITH MODERNIST COPPER BRACELET - Designed as a rigid copper cuff with cut out strips folded back and secured with rivets, marked "Art Smith", overall, 3 x 2 inches, 2-3/8 inner diameter, seized on December 12, 2023, and currently in the custody CBP.
- v. ONE (1) 18K YELLOW GOLD CURB LINK ID BRACELET - The central rectangular plaque engraved, "Juanita", and joined to the heavy curb link bracelet, marked "18k", 7-3/8 inches, 1/4 inches wide, 29.35 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- w. A PAIR OF ART SMITH MODERNIST BRASS AND COPPER U-SHAPED EAR CLIPS - Each designed as a copper crescent shaped panel, accented by applied brass trim, with screw back earrings, signed "Art Smith", 1-1/4 x 1 inch, 10.83 grams total weight, seized on December 12, 2023, and currently in the custody CBP.
- x. A PAIR OF ART SMITH MODERNIST STERLING SILVER KINETIC EAR PENDANTS - Each designed as a sterling silver tear drop plaque, suspending two (2) similar articulated terminals, signed "Art Smith", 2-1/4 x 3/4 inches, 17.34 grams total weight, seized on December 12, 2023, and currently in the custody CBP.

8. The defendant furniture listed below.
- a. An American black walnut double settee, designed by George Nakashima, 1964 30 by 83 by 31 inches, seized on December 12, 2023, and currently in the custody of CBP.
 - b. A set of six (6) East Indian laurel wood “Conoid” dining chairs, designed by George Nakashima, 1964, each inscribed with original client’s name “Seidenberg underneath Each 35 1/2 by 21 by 16 inches, seized on December 12, 2023, and currently in the custody of CBP.
 - c. An East Indian laurel wood “Conoid’ dining table, designed by George Nakashima, 1964, with eight (8) butterflies, inscribed with original client’s name “Seidenberg” underneath; together with an unidentified wood component that may be related to another object 73 by 54 inches (table). seized on December 12, 2023, and currently in the custody of CBP.
 - d. An American black walnut “Conoid” coffee table, designed by George Nakashima, executed circa 1963, inscribed on underside “III” 14 by 50 by 44 inches, seized on December 12, 2023, and currently in the custody of CBP.
 - e. A walnut and hickory Single Arm One-Piece Seat Lounge Chair with Right Arm, designed by George Nakashima, 1965, unsigned 33 by 32 by 18-1/2 inches, seized on December 12, 2023, and currently in the custody of CBP.
 - f. A pair of American black walnut Grajalas nightstands, made by Mira Nakashima, Nakashima Studio, 2021, each signed inside drawer in black pen “Haddawy A” and inscribed “DL” “Mira Nakashima, April 14, 2021”, each

with solid book-matched doors, one (1) drawer with burl pull, opening to an interior with adjustable shelf Each 22 by 20 by 20 inches, seized on December 12, 2023, and currently in the custody of CBP.

- g. A George Nakashima dovetailed double dresser, probably American black walnut, circa 1960's, no visible signature, with free edge top over a case fitted with six (6) drawers, raised on block form feet 32 by 60 1/2 by 22 inches, seized on December 12, 2023, and currently in the custody of CBP.
- h. A wood bed, second half 20th century, including headboard, side rails, and slats, hardware, presumably King size, headboard measures 80 by 35 inches, seized on December 12, 2023, and currently in the custody of CBP.
- i. A pair of walnut and rosewood cabinets, designed by Arthur Espenet Carpenter II (American, 1906-2006), the drop front door opening to an interior meant to house adjustable shelves (shelves lacking), rising on a double biomorphic base, signed underneath "Espenet 7114", seized on December 12, 2023, and currently in the custody of CBP.
- j. A Walnut headboard, designed by Arthur Espenet Carpenter II (American, 1906-2006). 1968, accommodates a California King Size Mattress; incised signature and number to verso "Espenet 6893", seized on December 12, 2023, and currently in the custody of CBP.
- k. A wall-mounted mahogany slab headboard, designed by Arthur Espenet Carpenter II (American, 1906-2006), unsigned, seized on December 12, 2023, and currently in the custody of CBP.

- l. An exotic wood cube form side table, designer unknown, second half 20th century 28 1/2 by 12 by 12 inches, seized on December 12, 2023, and currently in the custody of CBP.
- m. A rare wood “Mushroom Chest”, designed by Arthur Espenet Carpenter II (American, 1906-2006), circa 1970, signed “Espenet 7315” underneath, seized on December 12, 2023, and currently in the custody of CBP.
- n. A painted aluminum, oak and lacquered steel sideboard, designed by Jean Prouvé (French. 1901-1984), circa 1950-55, produced by Ateliers Jean Prouvé, Nancy, France 40 by 78-1/2 by 17-1/2 inches, seized on December 12, 2023, and currently in the custody of CBP.
- o. JB BLUNK (AMERICAN, 1926 – 2002) Untitled Circa mid-1980’s Redwood sculpture with black shoe polish No visible signature 59 1/2 by 12 by 13 inches Set on stone base (1-1/4 by 19-1/2 by 18-1/2 inches), seized on December 12, 2023, and currently in the custody of CBP.
- p. ISAMU NOGUCHI (AMERICAN, 1904-1988) “Kaki-persimmons” 1983 Welded and hot-dipped galvanized steel Signed and dated on back “I.N. ‘82”, numbered 5/26 on publisher’s plaque Published by Gemini G.E.L. 13 1/2 by 18 by 9 inches, seized on December 12, 2023, and currently in the custody of CBP.
- q. ISAMU NOGUCHI (AMERICAN, 1904-1988) “Messenger 2B” 1987 Bronze plate Presumably incised with the artist's initials and numbered at lower edge

- (not visualized onsite) Edition of 6 plus 2 AP 57 1/2 by 16 by 17 inches, seized on December 12, 2023, and currently in the custody of CBP.
- r. A George Nakashima walnut and sea grass, Grass Seated Stool, unsigned, seized on December 12, 2023, and currently in the custody of CBP.
 - s. A rosewood plywood and brass “Butterfly Stool”, designed by Sori Yanagi (JAPANESE, 1915-2011) for Tendo Mokko in 1954, unsigned, seized on December 12, 2023, and currently in the custody of CBP.
 - t. A set of four (4) teak and enameled steel stools from the College of Architecture, Chandigarh, designed by Perre Jeanneret, France/India, circa 1960, unmarked, seized on December 12, 2023, and currently in the custody of CBP.
 - u. A Costa Rican Ceremonial Volcanic Stone Metate, with stylized jaguar head and engraved geometric patterns, Guanacaste-Nicoya Culture, circa 4th -8th century AD ,seized on December 12, 2023, and currently in the custody of CBP.
 - v. A set of two (2) wood and woven leather “Ash Chairs”, designed by Wharton Esherick, 1953, made of hammer handles, woven leather seats, signed and dated on underside, seized on December 12, 2023, and currently in the custody of CBP.
 - w. A Swedish laminated pine “Uto” coffee table, designed by Axel Einar Hjorth (Swedish, 1888 – 1959), for Nordiska Kompaniet, Sweden, 1930’s, of oval

form with cupped disk top and central base, unsigned, seized on December 12, 2023, and currently in the custody of CBP.

- x. A Nazca textile mantle in blue woven fabric with a border of colorful figures, circa 5th - 10th century AD, textile mounted on linen mounted on wood frame structure, seized on December 12, 2023, and currently in the custody of CBP.
- y. A Nazca textile mantle in openwork woven fabric, circa 5th – 10th century AD, framed under Plexiglas, mounted on grey velvet, 29 by 35 inches, seized on December 12, 2023, and currently in the custody of CBP.
- z. A tall wooden chest, designed by Arthur Espenet Carpenter II (American, 1906-2006), of tall slender form, the upper section fitted with 36 cubbies, the lower portion with three (3) drawers, the sides extending to form supports, signed Espenet and numbered 7171 on reverse, 52 1/2 by 18 by 12 1/2 inches, seized on December 12, 2023, and currently in the custody of CBP.
- aa. A walnut low table, designed by Arthur Espenet Carpenter II (American, 1906-2006), 1968, with rectangular top and sides with exposed dovetail joinery, signed and dated underneath, 20 by 26 by 17 inches, seized on December 12, 2023, and currently in the custody of CBP.
- bb. A Native American stone tool, with incised features, 7 by 6 by 17 inches, seized on December 12, 2023, and currently in the custody of CBP.
- cc. A Native American stone tool, the long implement with incised details, 27 by 5 by 4 inches, seized on December 12, 2023, and currently in the custody of CBP.

- dd. A wood and metal “Pill Clock”, designed by George Nelson for Vitra Design Museum, 1965, with Vitra Design Museum/George Nelson Desk Clocks label, seized on December 12, 2023, and currently in the custody of CBP.
- ee. A walnut molded plywood Child’s Chair, designed by Charles Eames (1907-1978) & Ray Eames (1912-1988), Zeeland, Michigan, 1945, unsigned, with added painted lamb, the authorship of which is unknown, 14 1/2 by 13 by 10 1/2 inches, seized on December 12, 2023, and currently in the custody of CBP.
- ff. ‘Rudder’ stool, model IN-22, Designed 1944, unsigned, Isamu Noguchi (1904 - 1988 American) for Herman Miller, Zeeland, Michigan, the circular birch wooden seat over a parabolic beech leg and two straight zinc-plated steel legs mounted with steel brackets to a plywood block mounted to underside of seat, seized on December 12, 2023, and currently in the custody of CBP.
- gg. A grey enameled metal and chrome “Cobra” table lamp, designed by Greta M. Grossman (Swedish, 1906-1999) for Ralph O. Smith, circa 1950’s, with “Patent Pending” label, seized on December 12, 2023, and currently in the custody of CBP.
- hh. A plywood and steel “LTR” side table, designed by Charles and Eames for Herman Miller, Zeeland, Michigan, circa 1960’s, unmarked, with adhered manufacturer’s label, seized on December 12, 2023, and currently in the custody of CBP.

- ii. A pair of walnut illuminated bookshelf cabinets with tambour doors, designed by Arthur Espenet Carpenter II (American, 1906-2006), 1969, each of bookshelf form, the upper portion with three (3) shelves, the lower outset portion with sliding tambour doors opening to reveal a storage area, seized on December 12, 2023, and currently in the custody of CBP.
- jj. A Massim Lime Spatula 5 1/4 by 2 1/2 by 2 1/2 inches, seized on December 12, 2023, and currently in the custody of CBP.
- kk. An Olmec stone figure, probably limestone, circa 1000-400 BC, in the form of a were-jaguar with cinnabar in the recesses, seized on December 12, 2023, and currently in the custody of CBP.
- ll. An Olmec implement, probably jade, circa 1000-400 BC, depicting a were-jaguar with cinnabar in the recesses stone, seized on December 12, 2023, and currently in the custody of CBP.

Jurisdiction and Venue

- 9. This Court has subject matter jurisdiction for an action commenced by the United States pursuant to 28 U.S.C. § 1345, and for an action for forfeiture pursuant to 28 U.S.C. § 1355(a). This Court also has jurisdiction over this particular action pursuant to 21 U.S.C. § 881.
- 10. This Court has *in rem* jurisdiction over the Defendant property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

11. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

Grounds for the Forfeiture

12. Defendant properties are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), because they constitute property involved in transactions or in attempted transactions in violation of sections 1956 and/or 1957 of Title 18, United States Code, or are properties traceable to such property.
13. Defendant properties are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), because they constitute or were derived from proceeds traceable to an offense constituting a “specified unlawful activity” as defined in Section 1956(c)(7) of Title 18, United States Code, or a conspiracy to commit such offense. Such offenses include violations of 21 U.S.C. §§ 841, 846 (drug trafficking and conspiracy to commit drug trafficking).
14. Defendant properties are subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because it constitutes 1) money, negotiable instruments, securities and other things of value furnished or intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act, 2) proceeds traceable to such an exchange, and/or 3) money, negotiable instruments and securities used and intended to be used to facilitate a violation of the Controlled Substances Act.

Facts

15. On September 12, 2019, the Lancaster County Sheriff’s Office (LSO) Interdiction Unit arrested Tyler Gooch at NW 84 & HWY 34, Lincoln, Lancaster County, Nebraska, after

the vehicle he was driving was found containing 90 pounds of marijuana, 3,001 THC vape cartridges, and 30 pounds of marijuana shatter. The investigation was continued by the Homeland Security Investigations Major Crimes Financial Task Force (MCFTF) made up of Lancaster County Sheriff's Office Investigators, Nebraska State Patrol Investigators, and agents from the Department of Homeland Security Investigations, Omaha Field Office. Through the investigation, it was determined the controlled substances Gooch was in possession of were going to be delivered to a Cooperating Defendant (CD-1) of known reliability in eastern Nebraska.

16. In January of 2020, the MCFTF executed a State of Nebraska search warrant at a Papillion residence owned by CD-1. Pursuant to the search warrant, 111 pounds of marijuana, 32 pounds of THC shatter, and 5 pounds of THC oil was seized from within the Papillion residence.
17. Through the investigation—to include surveillance, electronic surveillance, electronic phone forensics, and interviews—law enforcement learned that the seized marijuana was shipped through a company called Fastbox.
18. Research on the company FastBox LLC revealed it to have office warehouses in New York, New York; Nashville, Tennessee; Laurel, Maryland; Cincinnati, Ohio; North Hollywood, California; Chicago, Illinois; and Miramar, Florida. Additional research has revealed limited information about the business FastBox LLC. FastBox LLC advertises on their website, (<https://www.goFastBox.com/>) that FastBox LLC was born to provide an alternative to traditional portable storage moving solutions.

19. In late March 2020, 24-hour electronic surveillance was established on multiple FastBox warehouses to include Maspeth, New York and North Hollywood, California.
20. On April 11, 2020, a worker at the FastBox New York City location was observed through electronic surveillance to be moving wooden FastBox crates from the FastBox NY warehouse into a third-party semi-tractor bearing New York plate 712157PC with a towing trailer bearing Maine license plate 2280450.
21. On April 13, 2020, an HSI Oklahoma City Task Force officer stopped the semi-tractor bearing New York license plate 712157PC towing trailer bearing Maine license plate 2280450.
22. Pursuant to a K-9 sniff and subsequent alert to the odor of narcotics, law enforcement conducted a probable cause search of the trailer.
23. HSI discovered approximately \$3.9 million of suspected narcotics proceeds secreted in one the FastBox crates. The suspected narcotics proceeds were packaged and marked with different symbols and/or acronyms, which suggests the bulk currency belonged to different individuals.
24. On or about May 7, 2020, HSI executed multiple search warrants on FastBox locations, FastBox containers, FastBox employee residences, and FastBox storage units in California, Chicago, Cincinnati, Kansas City, and New York.
25. Pursuant to the state and federal warrants, HSI New York, HSI Cincinnati, HSI Chicago, HSI Kansas City, and HSI California seized over 55,000 vials of Marijuana byproduct tetrahydrocannabinol (THC) vape pens, which is equivalent to approximately 3500 kilograms of dried leaf marijuana and over \$1.6 million of suspected narcotics proceeds.

26. Subpoenaed records for the third-party transportation companies used by FastBox LLC to ship FastBox crates indicated FastBox shipped approximately 247 loads from California between 2014 and 2020. The records also indicated FastBox LLC shipped 368 loads to California between 2014 and 2020.
27. In May and June 2020, the MCFTF developed a cooperating defendant (CD-2)—who HSI has deemed credible and reliable based on CD-2 providing information that was later corroborated by other cooperating witnesses and confirmed by investigators—confirmed that FastBox LLC began operations in 2014 as a marijuana and marijuana byproduct delivery company. CD-2 also confirmed that David LEIDERMANN (hereinafter “LEIDERMANN”) and James Vincent REJA, aka REGA, (hereinafter “REJA”) were partners in charge of the operation.
28. CD-2 indicated Eric THIBODO, Richard Wesley MARSHALL, and Adam BREGMAN (hereinafter “BREGMAN”) aka “A” and “A-Real”, were clients of LEIDERMANN and REJA. CD-2 indicated THIBODO, MARSHALL, and BREGMAN used the FastBox service to move marijuana and marijuana proceeds between California and other FastBox locations.
29. CD-2 stated that since 1998, CD-2 has been working with LEIDERMANN and REJA in various roles in the drug trafficking organization (DTO). Originally CD-2 started working in marijuana grow locations in California tending to the growth of marijuana plants.
30. Later, CD-2 moved to New York and started receiving large shipments of marijuana and marijuana products for delivery. CD-2 would then ship the money from the sale of the marijuana back to Los Angeles for LEIDERMANN and REJA.

31. During this time, CD-2 would contact LEIDERMANN and REJA for instructions concerning the business. CD-2 stated that LEIDERMANN and REJA were equal partners but had different roles within the DTO.
32. HSI Omaha recorded conversations between CD-2 and LEIDERMANN and CD-2 and REJA discussing the FastBox transportation business.
33. CD-2 estimated LEIDERMANN and REJA produced over 1,000,000 pounds of marijuana between 1998 and 2014, the majority of which was shipped to New York City.
34. CD-2 estimated each bulk currency shipment from New York to California in the FastBox containers was at least \$1,000,000.00.
35. CD-2 indicated the container that was seized on April 13, 2020, described above was a larger shipment.
36. On August 31, 2020, Cooperating Defendant 3 (CD-3) of known reliability met with LEIDERMANN and REJA and received approximately \$150,000.00 in U.S. Currency from REJA during the meeting.
37. This money was narcotics proceeds that was owed to CD-2 as determined from recorded calls. This meeting was recorded and monitored by HSI. Surveillance and electronic surveillance indicated REJA traveled directly to the meeting location from his residence at 816 Seward Street, Los Angeles, California (hereinafter "SEWARD RESIDENCE").
38. CD-2 knew through discussions with REJA and LEIDERMANN (some of which were recorded) that REJA was responsible for maintaining the cash proceeds of their illegal marijuana transport business.

39. Through the investigation—to include *inter alia* dozens of interviews, historical records checks, open-source checks, law enforcement database checks, seized document review, electronic forensic data collected—HSI determined REJA and LEIDERMANN’s source of cash was derived from the illegal sale and transportation of marijuana and marijuana proceeds from 1999 to 2023.

MARIJUANA PROCEEDS MONEY LAUNDERING SCHEME

40. In July 2023, HSI Omaha interviewed Nicole Branch. Branch worked as REJA’s assistant from approximately 2012 to 2019.
41. Branch indicated she was responsible for making structured cash purchases of money orders to pay REJA’s bills.
42. According to Branch, these bills included bills for the residence where REJA’s wife, Francesca Tosti, lived (428 N Las Palmas, Los Angeles, and another LA address connected with Tosti) and the SEWARD RESIDENCE, which was considered the “office” and residence where REJA’s girlfriend, Kristina Warren, lived.
43. Branch would typically start her workday at the SEWARD RESIDENCE, where she was given cash by REJA and instructed on how many money orders to purchase at various locations. REJA would also instruct Branch what bills to pay with the money orders.
44. Records obtained from US Postal Inspection Service (USPIS) support Branch’s information that Branch went from post office to post office not buying more than two money orders at one time.
45. Copies of the money orders obtained from USPIS corroborate Branch’s information that the money orders were then used to pay bills owed by REJA.

46. Some of the above-mentioned money orders were sent to Howard Rose Gallery (hereinafter “The Gallery”) in New York City to pay for invoiced art purchases.
47. In July 2023, HSI served an administrative subpoena on The Gallery in New York City. The Gallery provided detailed records regarding the money orders received from Branch.
48. The money orders received by The Gallery were used to pay invoices for art purchased by REJA. The Gallery invoice records confirmed that money order serial numbers received by The Gallery from Branch were the same money order serial numbers provided to HSI by USPIS when a search was conducted using Branch’s name.
49. The Gallery records also showed that cash payments of \$10,000.00 were delivered as payment along with the previously mentioned money orders.
50. The Gallery invoice records clearly show money orders and cash payments were received from Branch.
51. CD-2, as mentioned above, confirmed that CD-2 delivered cash to The Gallery on at least one occasion for REJA. The Gallery records confirmed the cash was used to purchase art and sculpture items totaling approximately \$145,052.00.
52. An HSI Omaha administrative subpoena was served on Rago Wright/LA Modern Auction for all records pertaining to REJA. The Rago Wright/LA Modern Auction records indicate that between 2012 and 2023 REJA purchased at least \$900,000.00 in fine art, fine furniture, and collectables using cash as the means of purchase.
53. Emails between REJA and Rago Wright/LA Modern Auction, which were produced by Rago Wright/LA Modern Auction through subpoena production, include the actual name of Nicole Branch as the person who delivered cash to Rago Wright/LA Modern Auction.

54. In 2020 and again in 2023, HSI Omaha received documents pursuant to an administrative subpoena from LA Couriers, an armored car service operating in Los Angeles, CA.
55. These documents indicate that LA Couriers picked up cash from James REGA (aka REJA) at the SEWARD RESIDENCE.
56. The first cash pickup was on April 24, 2015, and continued until April 2023. From June 2019 until April 2023, LA Couriers picked up at least \$3,500,000.00 in cash from James REJA at the SEWARD RESIDENCE.
57. The receipts provided to HSI by LA Courier all listed James “REGA” at the SEWARD RESIDENCE.
58. The receipts provided to HSI from 2020 to 2023 all listed “James REGA” with telephone number XXX-XXX-2319. XXX-XXX-2319 is REJA’s phone number as confirmed through GPS ping and physical surveillance. REJA maintained this phone number from May 2020 to April 2023.
59. LA Couriers’ tracking system has been updated and their current system can only retrieve data for the past 24 months. However, two LA Courier employees—one of which was the owner and both employees worked for the company for more than 30 years—indicated James “REGA” has been their point of contact for the cash pick-ups from the SEWARD RESIDENCE for at least the past four years.
60. HSI Omaha served administrative subpoenas to City National Bank (hereinafter “CNB”). CNB records indicate the majority of the cash picked up by LA Couriers from the SEWARD RESIDENCE was deposited into 3 bank accounts consisting of: (1) City National Bank account XXXXX9124 belonging to More Gold Records C/O Premier

Business Management Group (CNB account XXXXX9124); (2) account XXXXX9995 owned by Camera Ready Architecture, C/O Premier Business Management Group (CNB account XXXXX9995); and (3) account XXXXX8425 owned by Gerald CASALE trust (CNB account XXXXX8425).

61. Included in the CNB documents was a signature card which lists “James REGA” aka REJA and Gerald CASALE (hereinafter “CASALE”) as managing members/owners of CNB account XXXXX9995.
62. The signature card for CNB account XXXXX8425 and CNB account XXXXX9124 listed CASALE as the owner and signature on the account, without having REJA’s name listed. However, since 2015 CNB account XXXXX9995 has had multiple transfers from and to CNB account XXXXX8425.
63. In particular, this included 38 total transfers with \$1,612,500.00 inflows and \$894,926.67 outflows.
64. Further, since 2020, CNB account XXXXX8425 has had two transfers to CNB account XXXXX9124. This included 2 total transfers and \$67,281.00 in outflows.

SEIZURE OF \$2,033,094.98 FROM JP MORGAN CHASE ACCOUNT XXXX2583

65. Based on the analysis of the subpoenaed documents of the CNB account XXXXX9995, law enforcement determined that CNB account XXXXX9995 was used (see below) to make 17 payments totaling (\$287,370.64) to a mortgage that was financed by BSI Financial Services between September of 2019 to January 2021.

66. The following are the transactions that were sent from CNB account XXXXX9995:

Account Number | Transaction Date | Total Cash Out | Description

XXXXX9995 9/13/2019 \$16,805.30 Preauthorized Debit BSI
FINANCIAL SE BSI FINANC WEB JAMES REGA

XXXXX9995 10/2/2019 \$16,805.30 Preauthorized Debit BSI
FINANCIAL SE BSI FINANC WEB JAMES REGA

XXXXX9995 11/5/2019 \$16,805.30 Preauthorized Debit BSI
FINANCIAL SE BSI FINANC WEB JAMES REGA

XXXXX9995 12/6/2019 \$16,805.30 Preauthorized Debit BSI
FINANCIAL SE BSI FINANC WEB JAMES REGA

XXXXX9995 1/13/2020 \$16,805.30 Preauthorized Debit BSI
FINANCIAL SE BSI FINANC WEB JAMES REGA

XXXXX9995 2/5/2020 \$16,805.30 Preauthorized Debit BSI
FINANCIAL SE BSI FINANC WEB JAMES REGA

XXXXX9995 3/6/2020 \$16,805.30 Preauthorized Debit BSI
FINANCIAL SE BSI FINANC WEB JAMES REGA

XXXXX9995 3/31/2020 \$16,805.30 Preauthorized Debit BSI
FINANCIAL SE BSI FINANC WEB JAMES REGA

XXXXX9995 5/06/2020 \$16,805.30 BSI Financial SE BSI Financ Web
Closet Door LL

XXXXX9995 6/02/2020 \$16,805.30 BSI Financial SE BSI Financ Web
Closet Door LL

XXXXX9995 7/08/2020 \$16,805.30 BSI Financial SE BSI Financ Web
Closet Door LL

XXXXX9995 8/10/2020 \$16,805.30 BSI Financial SE BSI Financ Web
Closet Door LL

XXXXX9995 9/10/2020 \$17,365.48 BSI Financial SE BSI Financ Web
Closet Door LL

XXXXX9995 10/08/2020 \$16,805.30 BSI Financial SE BSI Financ Web
Closet Door LL

XXXXX9995 11/05/2020 \$17,365.48 BSI Financial SE BSI Financ Web
Closet Door LL

XXXXX9995 12/07/2020 \$16,805.30 BSI Financial SE BSI Financ Web
Closet Door LL

XXXXX9995 01/11/2021 \$17,365.48 BSI Financial SE BSI Financ Web
Closet Door LL

67. HSI served an administrative subpoena on BM Real-estate Service; doing business as Priority Financial (hereinafter “PF”). The PF documents included a document titled “old Loan docs signed,” (hereinafter “PF-OLD”). PF-OLD included all the closing documents for the June 2019 sale of 428 N Las Palmas, Los Angeles CA, 90004 (hereinafter “LAS PALMAS RESIDENCE”).
68. PF-OLD specifically included documents which list Gerald CASALE as the buyer/signer of LAS PALMAS RESIDENCE and also included documents which list James “REGA” aka REJA as the buyer/signer.
69. PF-OLD documents also included multiple escrow amendment listing Gerald CASALE as “buyer” and signer and Closet Door, LLC as Assignee. Other escrow amendments list James “REGA” aka REJA as “Buyer” and signer.
70. PF-OLD included an estimated Settlement Statement for the LAS PALMAS RESIDENCE which listed a contract sale price of \$3,883,000.00. The settlement statement listed three “deposits of earnest money.”
71. PF-OLD also included a loan application for the LAS PALMAS RESIDENCE in the name of James “REGA” aka REJA and a “Multistate Completion Guaranty” between

James “REGA” aka REJA (Borrower) and BM REAL ESTATE SERVICES, INC DBA Priority Financial Network. This Guaranty is in the “note” amount of \$2,523,950.00.

72. PF-OLD also included a “Signature Affidavit and AKA Statement” that James REGA signed for the name variation of James V. REJA, V is for Vincent, REJA’s given middle name.
73. In June 2023, the District of Nebraska issued a trial subpoena to Linzer Law group asking for all real estate transaction records for REJA. These documents included statements from BSI financial services with listed account number XXXXX771. These statements list REJA as the borrower on the mortgage for the LAS PALMAS RESIDENCE with a monthly payment of \$16,805.30. This mortgage was issued on 7/18/2019 for an original principal balance amount of \$2,523,950.00.
74. BSI Financial services account number XXXXX771 held the mortgage for the LAS PALMAS RESIDENCE from July 2019 until January 2021 in the name of James “REGA” aka REJA. CNB account XXXXX9995, which is owned by REJA, made the exact same monthly payment (\$16,805.30) due to BSI Financial services account number XXXXX771, sent from CNB account XXXXX9995.
75. During additional analysis of CNB account XXXXX9995, on June 7, 2019, the balance of CNB account XXXXX9995 was \$72,377.29. Subsequent transactions in the account took place on June 21, 2019, and were comprised of 3 incoming wires in the amounts of \$246,250.00, \$246,500.00, and \$800,000.00, from the following originators: “THOMAS P HILL TSTEE/GRNT”, “JAMES F FETZER REVOCABLE TRUST#DTD”, and “DON L DEVORE#BONITA L DE VORE#STEV”.

76. In addition to these transactions a transfer was sent on June 28, 2019, from CNB account XXXXX8425 to CNB account XXXXX9995 in the amount of \$200,000.00. The account balance was \$1,565,887.29 on June 28, 2019, after these 4 credits were received.
77. Two wires were sent from CNB Account XXXXX9995 to West Coast Escrow on June 28, 2019, and July 5, 2019, in the amounts of \$117,000.00 and \$1,264,292.89. After these transactions, the CNB account XXXXX9995 balance was \$181,546.76.
78. In the PF documents mentioned above, a letter located in the REJA file that was provided to the loan officer indicates the origination from the above-mentioned wire transfers were as follows: "\$800,000 on 6/21/19 Art Sales," "\$246,250 on 6/21/19 Art Sales," and "\$246,250 on 6/21/19 Art Sales."
79. On December 10, 2019, the CNB account XXXXX9995 contained \$15,745.17. On the same date a transfer was received from CNB account XXXXX8425 in the amount of \$700,000.00.
80. Additionally, on this date a wire was sent out from CNB account XXXXX9995 to Don L Devore in the amount of \$700,000.00, with a wire memo of "acct JAMES REGA LOAN REPAYMENT DON L DEVORE." The account balance after these two transactions took place returned to \$15,745.17.
81. Analysis of deposits into CNB account XXXXX8425 between August 2018 and December 2019, indicate that CNB account XXXXX8425 was funded by cash deposits of \$568,038.00 which were believed to be picked up by LA Couriers from REJA at the SEWARD RESIDENCE.

82. The records suggest the earnest deposit REJA made for the LAS PALMAS RESIDENCE was funded with proceeds from LEIDERMANN's and REJA's drug trafficking activities that REJA collected at the SEWARD RESIDENCE and made deposits into the three accounts identified above.
83. During additional analysis of CNB account XXXXX9995, 14 cash deposits totaling \$553,200.00 were identified as funding the account between August of 2019 to January 2021. Directly prior to the first of these deposits the account's balance was \$17,309.12.

Account Number - Transaction Date - Total Cash In - Description

XXXXX9995 8/22/2019 \$34,240.00 Deposit 131 (Cash Deposit)

XXXXX9995 8/30/2019 \$35,000.00 Deposit 132 (Cash Deposit)

XXXXX9995 09/27/2019 \$38,463.00 Deposit 133 (Cash Deposit)

XXXXX9995 10/23/2019 \$27,061.00 Deposit 134 (Cash Deposit)

XXXXX9995 10/31/2019 \$29,175.00 Deposit 135 (Cash Deposit)

XXXXX9995 12/04/2019 \$19,000.00 Deposit 137 (Cash Deposit)

XXXXX9995 01/09/2020 \$31,000.00 Deposit 139 (Cash Deposit)

XXXXX9995 02/07/2020 \$21,135.00 Deposit 140 (Cash Deposit)

XXXXX9995 09/01/2020 \$43,221.00 Deposit 145 (Cash Deposit)

XXXXX9995 10/29/2020 \$41,400.00 Deposit 146 (Cash Deposit)

XXXXX9995 11/30/2020 \$40,403.00 Deposit 147 (Cash Deposit)

XXXXX9995 11/30/2020 \$98,000.00 Deposit 148 (Cash Deposit)

XXXXX9995 12/24/2020 \$55,040.00 Deposit (Cash Deposit)

XXXXX9995 02/02/2021 \$40,062.00 Deposit 150 (Cash Deposit)

84. The abovementioned deposits all coincide with dates LA Courier reported picking up cash from the SEWARD RESIDENCE, in the name James “REGA”.
85. The records suggest the cash deposits into CNB account XXXXX9995 between August 2019 and January 2021, directly funded the payments for BSI Financial services account number XXXXX771, the mortgage account for LAS PALMAS RESIDENCE held by James “REGA” aka REJA.
86. The previously mentioned Linzer Law trial Subpoena records include a June 7, 2019, “California Residential Purchase Agreement and Joint Escrow document” listing Gerald CASALE as the buyer of LAS PALMAS RESIDENCE.
87. The Linzer subpoena records also included a State of Delaware document from June 27, 2019, indicating “Closet Door LLC” was formed. Subpoenaed records also included the Closet Door LLC operating agreement listing Gina NIETO as sole member. Gina NIETO is listed as the mother to James REJA on REJA’s US passport application.
88. The Linzer subpoena records also included a February 17, 2021, deed transfer document which shows that Los Angeles County assessor’s parcel number 5524-034-006 LAS PALMAS RESIDENCE was transferred from James “REGA” aka REJA to his wife, Francesca Tosti (hereinafter “F. TOSTI”).
89. The Linzer subpoena records indicate that on May 20, 2021, the deed for Los Angeles County assessor’s parcel number 5524-034-006 LAS PALMAS RESIDENCE was transferred to Closet Door, LLC.
90. HSI Kansas City Asset Forfeiture unit hired a third-party title company to analyze the LAS PALMAS RESIDENCE for pre-seizure analysis. The third-party company

identified Los Angeles County assessor's parcel number 5524-034-006 as LAS PALMAS RESIDENCE.

91. A review of City National Bank account XXXXX8425 owned by Gerald CASALE trust (CNB account XXXXX8425) shows monthly payments to Planet Home Lending "J REGA XXXXX3599."
92. The payments from CNB account XXXXX8425 to Planet Home Lending "J REGA XXXXX3599" began in June 2021 and continued through May 2023, in some instances a month was missed, and double payment was made within the same month.
93. Between June 2021 and February 2023, 22 payments of \$12,292.00 were sent to Planet Home Lending "J REGA XXXXX3599" for a subtotal of \$270,424.00.
94. In March 2023 a payment of \$26,267.43 was made, in April 2023 a payment of 26,267.43 was made, and on May 31 a payment of \$26,882.03 was made to Planet Home Lending "J REGA XXXXX3599" for a subtotal of \$79,416.89 between March and May 2023.
95. The total amount of payments from CNB account XXXXX8425 to Planet Home Lending "J REGA XXXXX3599" between June 2021 and May 2023 is \$349,840.89.
96. The LA Courier and CNB records (referenced above) and other banking records indicate that between April 2020 and April 2023, at least \$1,000,000.00 in cash was collected from James "REGA" at the SEWARD RESIDENCE and deposited into CNB account XXXXX8425.
97. Planet Home Lending account number XXXXX3599 held the mortgage for the LAS PALMAS RESIDENCE since January 2021 in the name of James "REGA" aka REJA.

98. CNB account XXXXX8425 is owned by CASALE; but REJA has deposited over \$1,000,000.00 in likely drug proceeds to the account as referenced above and made the monthly payment due to Planet Home Mortgage account number XXXXX3599.
99. The same LA Courier records mentioned above, the CNB records mentioned above, and other banking records indicate that between April 2020 and April 2023, at least \$600,000.00 in cash was collected from James "REGA" at the SEWARD RESIDENCE and deposited into CNB account XXXXX9124.
100. The aforementioned LA Courier records, CNB records, and other banking records indicate that between April 2020 and April 2023, six (6) cash deposits totaling \$318,126.00, were collected from James "REGA" at the SEWARD RESIDENCE and deposited into CNB account XXXXX9995.
101. Based on the same LA Courier records mentioned above, on April 6, 2023, LA Courier picked up \$54,000.00 in cash from James "REGA" at the SEWARD RESIDENCE. That cash was deposited into CNB account XXXXX8425.
102. LA Courier records indicate April 6, 2023, was the last pick up of cash from the SEWARD RESIDENCE
103. On April 12, 2023, HSI Omaha with the assistance of HSI LA, attempted to execute a federal arrest warrant on James REJA aka REGA. REJA was able to sneak out the back door of the SEWARD RESIDENCE prior to being apprehended.
104. A California State search warrant was executed on the SEWARD RESIDENCE confirmed REJA was not at the property. On the same day, HSI successfully executed the federal arrest warrant for David Max LEIDERMAN.

105. The financial investigation clearly shows the LAS PALMAS RESIDENCE was purchased and/or maintained by illicit proceeds. The investigation—through bank records and interviews—establish that the SEWARD RESIDENCE was used to facilitate the laundering of illicit proceeds into the banking system.
106. Disbursement of seller proceeds from the sale the LAS PALMAS RESIDENCE were wired to a JP Morgan Chase account, account number XXXX2583 in the name of Closet Door LLC.
107. In early November 2023, pursuant to District of Nebraska federal seizure warrant, the MCFTF seized \$2,033,094.98 from JP Morgan Chase account XXXX2583.
108. On November 13, 2023, to avoid apprehension from law enforcement, James REJA committed suicide.

MARIJUANA PROCEEDS LAUNDERED THROUGH ART AND FINE FURNITURE

109. Based on the analysis of the subpoenaed documents from the CNB accounts XXXXX9995 and XXXXX8425, and Bank of America (“BOA”) account XXXX XXXX 1464, 11 outgoing transactions totaling \$370,571.60 were identified between June 2010 and April 2022 where the counterparty was “BONHAMS” or “BONHAMS & BUTTERFIELDS AUCTIONEERS.” Please see below for a detailed breakdown of these transactions:

BANK ACCOUNT	POSTED DATE	DESCRIPTION	AMOUNT
CNB XXXXX8425	6/25/2010	CHECK #3642	(\$59.00)
CNB XXXXX9995	12/5/2019	Easi Intrnl Tsfr Dr	(\$253,356.44)
CNB XXXXX9995	10/6/2020	Easi Intrnl Tsfr Dr	(\$7,310.95)

BOA XXXXXXXXXX1641	2/11/2020	CHECK #222	(\$1,448.23)
CNB XXXXX9995	12/15/2020	Easi Intrnl Tsfr Dr	(\$10,000.00)
CNB XXXXX9995	1/22/2021	Easi Intrnl Tsfr Dr	(\$9,000.00)
BOA XXXXXXXXXX164	2/3/2021	CHECK #224	(\$4,275.68)
CNB XXXXX9995	12/20/2021	Easi Intrnl Tsfr Dr	(\$16,431.86)
CNB XXXXX9995	1/27/2022	Easi Intrnl Tsfr Dr	(\$25,967.97)
CNB XXXXX9995	3/15/2022	Easi Intrnl Tsfr Dr	(\$25,967.97)
CNB XXXXX9995	4/8/2022	Easi Intrnl Tsfr Dr	(\$16,753.50)

110. Additional analysis of CNB XXXXX8425, resulted in the identification of one outgoing payment of \$55,826.05 on July 15, 2015, to “Modern Auctions, Inc.”
111. During analysis of CNB account XXXXX8425, 134 cash deposits totaling \$3,956,354.21 were identified as funding the account between July 2011 to July 2023.
112. During analysis of CNB account XXXXX9995, 111 cash deposits totaling \$2,592,587.73 were identified as funding the account between January 2012 to February 2021.
113. In October 2023, HSI Omaha proffered CD-3 who HSI believes to be credible and reliable based on CD-3’s knowledge of the REJA/LEIDERMANN organization and the corroborating cash deposit and asset purchase documents provided to support CD-3’s information.
114. CD-3’s years of professional experience involving art and real estate markets makes CD-3 extremely knowledgeable in the Los Angeles, California high-end art and real estate markets.
115. CD-3 met REJA and LEIDERMANN in approximately 2011.

116. Between 2011 and 2022, CD-3 received approximately \$12,000,000.00 in cash marijuana proceeds from REJA and LEIDERMANN for the purchase of *inter alia* Rolex watches, fine art, fine furniture, vehicles, and houses.
117. CD-3 provided HSI with information regarding REJA's art and fine furniture collection which CD-3 knew was purchased using marijuana proceeds. CD-3 indicated REJA's collection was purchased from a number of auction houses and private dealers around the United States.
118. Further analysis of the CNB accounts was conducted focusing on the payments made to art auction houses around the country. HSI served administrative subpoenas on multiple art dealers around the country to include: Bonhams, Rago Wright, Fred Backler, Michael Hamson oceanic art, and Arte Primitivo, and The Gallery.
119. In 2016, CD-3 received \$838,466.00 in cash from REJA and wired the funds to assist in closing on 9980 S Hwy 1, Elk California (hereinafter "ELK PROPERTY 1").
120. In late 2018 and early 2019, CD-3 received \$830,000.00 in cash from REJA and wired the funds to an escrow company for the purchase of 8821 S Hwy 1, Elk California (hereinafter "ELK PROPERTY 2").
121. CD-3 indicated that REJA kept the majority of his fine art and fine furniture and collectables at the SEWARD RESIDENCE and the LAS PALMAS RESIDENCE.
122. CD-3 has an extensive knowledge of REJA's collection because CD-3 was either involved in the purchase transactions for the collection or had conversations with REJA about his extensive collection. CD-3 valued REJA's collection at upwards of \$15,000,000.00.

123. CD-3 knew that REJA's primary source of cash was derived from the illegal sale of marijuana. During a September 7, 2023, conversation with CD-3, while REJA was an active fugitive, REJA complained to CD-3 about the outstanding warrant and could not believe "all of this over weed."

INFORMATION USED TO SEARCH ELK PROPERTY 1

124. CD-3 uses a driver (hereinafter "the DRIVER") to move valuable art and furniture. The DRIVER has worked for CD-3 for at least ten years. The DRIVER was introduced to REJA by CD-3 in or around 2018. REJA used the DRIVER to move high-valued art and fine furniture over the past five years.

125. The DRIVER told CD-3 that in the summer of 2023, the DRIVER moved a large volume of items for REJA. The DRIVER captured text messages, pictures, and videos of the DRIVER's work for REJA in the summer of 2023. The DRIVER shared those pictures, videos, and text messages with CD-3.

126. The DRIVER told CD-3 that in the summer of 2023, REJA had the DRIVER move a moving truck full of art and collectables that were stored in the lower-level storage room of the SEWARD RESIDENCE.

127. The DRIVER told CD-3 that these items were moved to the back-alley access of 201 N Robertson, Los Angeles. This address is managed by Gina NIETO, REJA's mother.

128. Information obtained from the April 12, 2023, search warrant at the SEWARD RESIDENCE and from conversations with CD-3, reveal that the lower-level storage of the SEWARD RESIDENCE contained a collection of pre-Columbian art valued over \$1,800,000.00.

129. The DRIVER told CD-3 that REJA had the DRIVER moved the remainder of the fine furniture, fine art, and collectables that were stored at the SEWARD RESIDENCE to a property along the coast in Elk, California.
130. The DRIVER told CD-3 that two trips to the same property in Elk, California were made in the summer of 2023. During these two trips, the DRIVER told CD-3 that items were picked up from the LAS PALMAS RESIDENCE and the SEWARD RESIDENCE and moved to the property along the coast in Elk, California.
131. The DRIVER shared pictures with CD-3 which were taken during the unloading of a 30-foot U-Haul in Elk, California.
132. These pictures were analyzed against pictures obtained of ELK PROPERTY 1 during the search of the SEWARD RESIDENCE. Through comparison, law enforcement observed dozens of similarities between the sets of pictures indicating the DRIVER delivered to ELK PROPERTY 1.
133. Since late October 2023, CD-3 has been in telephone contact with F. TOSTI, widow of James REJA. During the telephonic conversation, F. TOSTI discussed the sale of items CD-3 knows through his experience with REJA's collection were purchased with marijuana proceeds. During these conversations F. TOSTI described her hesitancy to sell parts of REJA's fine art, fine furniture, and collectables collection because she is afraid the government will seize the proceeds of the sale.
134. On December 1, 2023, CD-3 had an in-person meeting with F. TOSTI. F. TOSTI and CD-3 discussed selling the bulk of the larger fine furniture in F. TOSTI's possession. F. TOSTI referenced a desire to sell a Nakashima table she believed to be worth over

\$100,000.00. CD-3 pointed out the referenced Nakashima table to law enforcement, which was in the pictures CD-3 received from the DRIVER.

135. CD-3 and F. TOSTI discussed a detailed list that CD-3 knew REJA kept of his fine art, fine furniture, and collectables collection. CD-3 and F. TOSTI discussed the possibility of that list being on a computer or easily accessible to REJA.
136. F. TOSTI stated that she and REJA were together and built this life together. F. TOSTI said that she wanted to keep as many sentimental artistic pieces as possible. F. TOSTI acknowledged that REJA and F. TOSTI were together for over a decade. F. TOSTI made statements questioning if the government was going to take “everything”. F. TOSTI made statements regarding the legality of her ownership to all of REJA’s possessions, based on their marriage. F. TOSTI made statements regarding the proceeds from the sale of the LAS PALMAS RESIDENCE. It is believed that this conversation is F. TOSTI inferring her knowledge that the fine art, fine furniture, and collectables were obtained with proceeds of REJA’s drug trafficking activities.

SEIZED FINE FURNITURE AND ART FROM ELK PROPERTY 1

137. On December 12, 2023, pursuant to a Northern District of California Federal search warrant, the following items were seized from ELK PROPERTY 1:
 - a. An American black walnut double settee, designed by George Nakashima, 1964 30 by 83 by 31 inches.
 - b. A set of six (6) East Indian laurel wood Conoid” dining chairs, designed by George Nakashima, 1964, each inscribed with original client’s name “Seidenberg underneath Each 35 1/2 by 21 by 16 inches. This item was

purchased by REJA through La Modern Auctions using cash on or about September 2018.

- c. An East Indian laurel wood “Conoid’ dining able, designed by George Nakashima, 1964, with eight (8) butterflies, inscribed with original client’s name “Seidenberg” underneath; together with an unidentified wood component that may be related to another object 73 by 54 inches (table).
- d. An American black walnut “Conoid” coffee table, designed by George Nakashima, executed circa 1963, inscribed on underside “III” 14 by 50 by 44 inches. This item was purchased by REJA through La Modern Auctions using cash on or about December 2012.
- e. A walnut and hickory Single Arm One-Piece Seat Lounge Chair with Right Arm, designed by George Nakashima, 1965, unsigned 33 by 32 by 18-1/2 inches.
- f. A pair of American black walnut Grajalas nightstands, made by Mira Nakashima, Nakashima Studio, 2021, each signed inside drawer in black pen “Haddawy A” and inscribed “DL” “Mira Nakashima, April 14, 2021”, each with solid book-matched doors, one (1) drawer with burl pull, opening to an interior with adjustable shelf Each 22 by 20 by 20 inches. This item was purchased by CD-3 on/or about March 2021 using cash believed

by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.

- g. A George Nakashima dovetailed double dresser, probably American black walnut, circa 1960's, no visible signature, with free edge top over a case fitted with six (6) drawers, raised on block form feet 32 by 60 1/2 by 22 inches. This item was purchased by CD-3 on/or about March 2021 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- h. A wood bed, second half 20th century, including headboard, side rails, and slats, hardware, presumably King size, headboard measures 80 by 35 inches. This item was purchased by CD-3 on/or about March 2021 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- i. A pair of walnut and rosewood cabinets, designed by Arthur Espenet Carpenter II (American, 1906-2006), the drop front door opening to an interior meant to house adjustable shelves (shelves lacking), rising on a double biomorphic base, signed underneath "Espenet 7114";
- j. A Walnut headboard, designed by Arthur Espenet Carpenter II (American, 1906-2006). 1968, accommodates a California King Size Mattress; incised signature and number to verso 'Espenet

6893". This item was purchased by REJA through La Modern Auctions using cash on or about September 2018.

- k. A wall-mounted mahogany slab headboard, designed by Arthur Espenet Carpenter II (American, 1906-2006), unsigned.
- l. An exotic wood cube form side table, designer unknown, second half 20th century 28 1/2 by 12 by 12 inches.
- m. A rare wood "Mushroom Chest", designed by Arthur Espenet Carpenter II (American, 1906-2006), circa 1970, signed "Espenet 7315" underneath. This item was purchased by CD-3 on/or about November 2022 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- n. A painted aluminum, oak and lacquered steel sideboard, designed by Jean Prouvé (French. 1901-1984), circa 1950-55, produced by Ateliers Jean Prouvé, Nancy, France 40 by 78-1/2 by 17-1/2 inches. This item was purchased by CD-3 on/or about June 2013 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- o. JB BLUNK (AMERICAN, 1926 – 2002) Untitled Circa mid-1980's Redwood sculpture with black shoe polish No visible signature 59 1/2 by 12 by 13 inches Set on stone base (1-1/4 by 19-1/2 by 18-1/2 inches).

- p. ISAMU NOGUCHI (AMERICAN, 1904-1988) “Kaki-persimmons” 1983 Welded and hot-dipped galvanized steel Signed and dated on back “I.N. ‘82”, numbered 5/26 on pol9 inches. This item was purchased by CD-3 on/or about April 2016 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- q. ISAMU NOGUCHI (AMERICAN, 1904-1988) “Messenger 2B” 1987 Bronze plate Presumably incised with the artist's initials and numbered at lower edge (not visualized onsite) Edition of 6 plus 2 AP 57 1/2 by 16 by 17 inches. This item was purchased by CD-3 on/or about November 2016 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- r. A George Nakashima walnut and sea grass, Grass Seated Stool, unsigned.
- s. A rosewood plywood and brass “Butterfly Stool”, designed by Sori Yanagi (JAPANESE, 1915-2011) for Tendo Mokko in 1954, unsigned. This item was purchased by REJA through La Modern Auctions using cash on/or about March 2017, with coinciding cash payment on March 31, 2017.

- t. A set of four (4) teak and enameled steel stools from the College of Architecture, Chandigarh, designed by Perre Jeanneret, France/India, circa 1960, unmarked.
- u. A Costa Rican Ceremonial Volcanic Stone Metate, with stylized jaguar head and engraved geometric patterns, Guanacaste-Nicoya Culture, circa 4th -8th century AD; fine quality 13 1/2 by 30 by 13 1/4 inches. This item was purchased by CD-3 on/or about June 2017 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- v. A set of two (2) wood and woven leather “Ash Chairs”, designed by Wharton Esherick, 1953, made of hammer handles, woven leather seats, signed and dated on underside. This item was purchased by CD-3 on/or about July 2016 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- w. A Swedish laminated pine “Uto” coffee table, designed by Axel Einar Hjorth (Swedish, 1888 – 1959), for Nordiska Kompaniet, Sweden, 1930’s, of oval form with cupped disk top and central base, unsigned.
- x. A Nazca textile mantle in blue woven fabric with a border of colorful figures, circa 5th - 10th century AD, textile mounted on linen mounted on wood frame structure. This item was

purchased by CD-3 on/or about October 2016 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.

- y. A Nazca textile mantle in openwork woven fabric, circa 5th – 10th century AD, framed under Plexiglas, mounted on grey velvet, 29 by 35 inches.
- z. A tall wooden chest, designed by Arthur Espenet Carpenter II (American, 1906-2006), of tall slender form, the upper section fitted with 36 cubbies, the lower portion with three (3) drawers, the sides extending to form supports, signed Espenet and numbered 7171 on reverse, 52 1/2 by 18 by 12 1/2 inches.
- aa. A walnut low table, designed by Arthur Espenet Carpenter II (American, 1906-2006), 1968, with rectangular top and sides with exposed dovetail joinery, signed and dated underneath, 20 by 26 by 17 inches.
- bb. A Native American stone tool, with incised features, 7 by 6 by 17 inches.
- cc. A Native American stone tool, the long implement with incised details, 27 by 5 by 4 inches.
- dd. A wood and metal “Pill Clock”, designed by George Nelson for Vitra Design Museum, 1965, with Vitra Design Museum/George Nelson Desk Clocks label.

- ee. A walnut molded plywood Child's Chair, designed by Charles Eames (1907-1978) & Ray Eames (1912-1988), Zeeland, Michigan, 1945, unsigned, with added painted lamb, the authorship of which is unknown, 14 1/2 by 13 by 10 1/2 inches. This item was purchased by REJA through La Modern Auctions using cash on/or about May 2012, with coinciding cash payment on June 21, 2012.
- ff. "Rudder" stool, model IN-22, Designed 1944, unsigned, Isamu Noguchi (1904 - 1988 American) for Herman Miller, Zeeland, Michigan, the circular birch wooden seat over a parabolic beech leg and two straight zinc-plated steel legs mounted with steel brackets to a plywood block mounted to underside of seat. This item was purchased by CD-3 on/or about April 2016 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- gg. A grey enameled metal and chrome "Cobra" table lamp, designed by Greta M. Grossman (Swedish, 1906-1999) for Ralph O. Smith, circa 1950's, with "Patent Pending" label; appears to be newly rewired, 16 1/2 by 12 by 14 inches. This item was purchased by REJA through La Modern Auctions using cash on/or about October 2010, reference invoice number 545.

- hh. A plywood and steel “LTR” side table, designed by Charles and Eames for Herman Miller, Zeeland, Michigan, circa 1960’s, unmarked, with adhered manufacturer’s label. This item was purchased by REJA through La Modern Auctions using cash on/or about December 2012, reference invoice number 2046.
- ii. A pair of walnut illuminated bookshelf cabinets with tambour doors, designed by Arthur Espenet Carpenter II (American, 1906-2006), 1969, each of bookshelf form, the upper portion with three (3) shelves, the lower outset portion with sliding tambour doors opening to reveal a storage area, A handsome and well-made piece. This item was purchased by REJA through Bonhams Auctions on/or about July 2022, with a coinciding cash payment on August 19, 2022, payment reference number 27583.
- jj. EDWARD BELL (BRITISH) “David Starts to Make Up for Scary Monsters” 1980 Polaroid photograph Signed and titled by the photographer in black ink at lower margin of matte Photograph: 3-1/2 by 3-1/2 inches Overall: 4-3/4 by 6-3/4 inches Framed in black wood frame, float mounted on grey matte, under Plexiglas.
- kk. A Massim Lime Spatula 5 1/4 by 2 1/2 by 2 1/2 inches. This item was purchased by REJA through Michael Hamson on/or

about March 2023, with a coinciding money order payment on March 27, 2023, and a coinciding cash payment on May 30, 2023.

ll. An Olmec stone figure, probably limestone, circa 1000-400 BC, in the form of a were-jaguar with cinnabar in the recesses. This item was purchased by CD-3 on/or about March 2022 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.

mm. An Olmec stone implement, probably jade, circa 1000-400 BC, depicting a were-jaguar with cinnabar in the recesses. This item was purchased by CD-3 on/or about March 2022 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.

SEIZED JEWELRY FROM ELK PROPERTY 1

138. HSI seized the following jewelry items from ELK PROPERTY 1 during a search warrant on December 12, 2023, and said jewelry is currently in the custody of Department of Homeland Security, CBP:

a. ONE (1) ROLEX 18K YELLOW GOLD DATEJUST BRACELET WATCH - Automatic mechanical movement, 36mm case, the circular brushed gold dial stamped “Rolex Oyster Perpetual DateJust Superlative Chronometer Officially Certified T Swiss T”, gold baton numerals, gold hands,

magnified date, within a polish gold bezel, to the 18k yellow gold case marked “18K”, and joined to the Oyster bracelet with deployant clasp, with extra links.

- b. ONE (1) ROLEX 18K YELLOW GOLD DATEJUST BRACELET WATCH - Reference no. 6917, automatic mechanical movement, 26mm case, the circular brown dial stamped “Rolex Oyster Perpetual DateJust Superlative Chronometer Officially Certified T Swiss T”, gold baton numerals, luminescent hands, magnified date, within a fluted gold bezel, to the 18k yellow gold case marked “18K”, and joined to the Oyster bracelet with deployant clasp, with Rolex box and paperwork.
- c. ONE (1) TIFFANY & CO. PLATINUM AND DIAMOND RING - Designed as a platinum band pavé set with thirty (30) circular-cut diamonds, approximately 0.42 carat total weight, F-G color, VS clarity, marked “Tiffany & Co. PT950”, ring size 4, 2 mm wide, 2.34 grams total weight.
- d. ONE (1) TIFFANY & CO. 18K YELLOW GOLD, YELLOW DIAMOND AND DIAMOND RING - Centering upon an old mine cut fancy yellow diamond, approximately 2.70 carats total weight, SI clarity, irregular cut, measuring 9.2 x 9.4 x 4.5 mm, 18k yellow gold mounting channel set with six (6) old European

and old mine-cut diamonds, approximately 0.36 carat total weight, G-I color, SI clarity, marked “Tiffany & Co. OR”, ring size 2.25 (with ball sizer), 3.05 grams total weight.

- e. ONE (1) 18K YELLOW GOLD AND DIAMOND RING - Centering upon an old European-cut diamond, approximately 3.00 carats total weight, I-J color, SI clarity, measuring 10.2 x 10.3 x 5 mm, 18k yellow gold mounting pavé set with one hundred (100) circular-cut diamonds, approximately 1.08 carats total, G-I color, SI clarity, marked “18k”, ring size 2.25 (with ball sizers), 3.89 grams total weight.
- f. ONE (1) ART SMITH MODERNIST BRASS NECKLACE - Of rigid design, the large brass collar panel, joined by undulating brass wirework detail, to the hook closure, marked “Art Smith”, 14 inches, overall 8-1/7 x 7 inches. This item was purchased by CD-3 on/or about October 2015 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- g. ONE (1) 18K YELLOW GOLD NECKLACE - Composed of a series of textured 18k yellow gold links, stamped “750” and with Italian marks, 16-3/4 inches, 25.00 grams total weight.
- h. ONE (1) ART SMITH MODERNIST BRASS AND COPPER CUFF BRACELET - Designed as a rigid brass wire cuff of

openwork design, further accented by curved copper panels, marked "Art Smith", overall, 4-1/2 x 3-1/4 x 2-1/2 inches, 2-1/8 inner diameter. This item was purchased by CD-3 on/or about March 2016 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.

- i. ONE (1) ART SMITH MODERNIST COPPER BRACELET - Designed as a rigid copper cuff with cut out strips folded back and secured with rivets, marked "Art Smith", overall, 3 x 2 inches, 2-3/8 inner diameter. This item was purchased by CD-3 on/or about July 2016 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.
- j. ONE (1) 18K YELLOW GOLD CURB LINK ID BRACELET - The central rectangular plaque engraved, "Juanita", and joined to the heavy curb link bracelet, marked "18k", 7-3/8 inches, 1/4
- k. A PAIR OF ART SMITH MODERNIST BRASS AND COPPER U-SHAPED EAR CLIPS - Each designed as a copper crescent shaped panel, accented by applied brass trim, with screw back earrings, signed "Art Smith", 1-1/4 x 1 inch, 10.83 grams total weight. This item was purchased by CD-3 on/or about April 2015 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.

1. A PAIR OF ART SMITH MODERNIST STERLING SILVER KINETIC EAR PENDANTS - Each designed as a sterling silver tear drop plaque, suspending two (2) similar articulated terminals, signed "Art Smith", 2-1/4 x 3/4 inches, 17.34 grams total weight. This item was purchased by CD-3 on/or about April 2015 using cash believed by CD-3 to be derived from marijuana proceeds provided to CD-3 by REJA.

INVESTIGATION OF ADAM BREGMAN

139. On April 12, 2023, HSI arrested LEIDERMANN. Pursuant to the arrest, HSI seized seven iPhones and one iPad from LEIDERMANN.
140. Pursuant to a District of Nebraska search warrant, LEIDERMANN's phones were searched. A contact in LEIDERMANN's phone was listed as "A-Real," with a number XXX-XXX-5266.
141. Through phone records and open-source records, XXX-XXX-5266 was determined to belong to BREGMAN.
142. A search of one of LEIDERMANN'S phones revealed text conversations either between LEIDERMANN and BREGMAN, using XXX-XXX-5266, or group chats which included LEIDERMANN and BREGMAN, using XXX-XXX-5266, where the parties discussed the difficulty of moving marijuana proceeds into the banking system.
143. Specifically, on August 11, 2021, LEIDERMANN, BREGMAN (using XXX-XXX-5266) and five other numbers in a group chat received a message from XXX-XXX-3838 saying "*Unfortunately we just had to make a huge tax payment and then immediately rent*

and bills all at once. That has the account pretty low on funds. I've been slowly putting money in to pay another bill out of it as is. I am working with the accountant towards getting a canna bank account. As of now it's hard to space deposits out enough to cover the things that can not be paid in cash without raising a red flag and getting it closed. Let me know if you need me to help facilitate a cash payment then."

144. BREGMAN then responds to the group, "*We can get account with DAMA for sure. Low Feliz has on. Scott can u connect heather with dAMA girl. We need to reorder these bags or we're gonna have to sell for 2800 instead of 3500*".
145. An open-source search on DAMA, determined DAMA was a third party that allowed marijuana manufacturers and those in the marijuana business to deposit marijuana proceeds into the banking system. National banks such as Wells Fargo, JP Morgan Chase, Bank of America, City National Bank, and others follow current federal laws and regulations and prohibit "known" marijuana proceed deposits into their institutions.
146. Through CD-3's business dealings with BREGMAN, LEIDERMANN, REJA and MARSHALL and detailed records kept by CD-3 regarding those business deals, CD-3 knows BREGMAN, LEIDERMANN, REJA and MARSHALL would purchase *inter alia* watches, fine furniture, art, real properties, and vehicles with proceeds from their marijuana sales.
147. CD-3 indicated that BREGMAN boasted to CD-3 about all his marijuana businesses he was involved in. CD-3 provided detailed financial records regarding CD-3's business transactions with BREGMAN. These records included *inter alia*: year payments in cash

were received from BREGMAN, specific amounts of cash received, and which property CD-3 then used the cash to pay for.

148. These records indicate BREGMAN provided CD-3 with \$5,100,000.00 in cash between 2011 and 2017 to purchase and make renovations to 7797 Torreyson Dr, Los Angeles, California 90046 (hereinafter “TORREYSON RESIDENCE”).
149. CD-3 stated several of these cash payments for the TORREYSON RESIDENCE, were delivered to CD-3 by LEIDERMAN, on behalf of BREGMAN.
150. Based on his experience with BREGMAN, LEIDERMAN, REJA, and MARSHALL, CD-3 believed some if not all the cash provided by BREGMAN or LEIDERMAN to purchase the TORREYSON RESIDENCE was derived from illegal marijuana sales.
151. CD-3 indicated that on several occasions CD-3 picked up a portion of the \$5,100,000.00 from BREGMAN’s Los Angeles apartment located at 1645 Vine Street, # 1007, Los Angeles, California (hereinafter “Vine Street Apartment”).
152. Based on CD-3’s previously mentioned knowledge in real estate and design, CD-3 indicated that in or around 2017 and 2018, BREGMAN sold the TORREYSON RESIDENCE and BREGMAN purchased 17121 Rancho Street, Los Angeles, California for approximately \$6,000,000.00 using the funds from the sale of the TORREYSON RESIDENCE.
153. In November 2023, HSI Kansas City obtained historical deed records for 17121 Rancho Street, Los Angeles, California. The deed records were obtained during a pre-seizure analysis by CWS Asset Management & Sales (CWSAMS), a third-party contractor hired by HSI Kansas City.

154. The deed records, indicate that BREGMAN purchased 17121 Rancho Street, Los Angeles, California on November 1, 2017, using 17121 Rancho LLC as the grantor.
155. The deed records indicate that on July 26, 2021, BREGMAN sold 17121 Rancho Street, Los Angeles, California to ERSCO LLC. The deed documents include a signed notarized grant deed, which was signed by BREGMAN as the manager of 17121 Rancho LLC. Zillow, the real estate application, indicates that 17121 Rancho Street, Los Angeles, California sold for \$8,550,000.00 on July 26, 2021.
156. CD-3 stated that in an unknown month and day in 2021, BREGMAN purchased 1904 SE Colony Way, Jupiter, Florida (hereinafter “the FLORIDA RESIDENCE”).
157. Based on historical conversations between CD-3 and BREGMAN’s real estate agent, CD-3’s real estate agent, and REJA; and based on CD-3’s aforementioned experience in real estate and design, CD-3 believed BREGMAN would have used some if not all the proceeds from the sale of 17121 Rancho Street, Los Angeles, California to purchase the FLORIDA RESIDENCE.
158. Based on conversations with BREGMAN, starting in 2012, CD-3 indicates BREGMAN’s only known source of income came from his marijuana business transactions.

SEIZED ITEMS FROM THE FLORIDA RESIDENCE

159. On December 12, 2023, pursuant to a southern District of Florida federal search warrant, the following items were seized from the FLORIDA RESIDENCE:
 - a. Cash in the amount of \$630,680.00.
 - b. An Andy Warhol painting referred to as “Apple” or “Macintosh” but untitled.
Purchased with cash through Neils Kantor on or about 2013.

- c. A KAWS painting “Close the Door Behind You” 2013. Purchase with cash through Neils Kantor on or about 2013.
- d. A PLATINUM AND DIAMOND THREE (3) STONE RING - Hand fabricated mounting in platinum, centering one (1) 3.00 carat radiant cut diamond, accompanied by GIA Diamond Grading Report (no. 15684500), D color, VVS1 clarity, no fluorescence, flanked by (2) tapered bullet cut diamonds, D-E color and VVS2 clarity, approximately 0.50 carat total weight, marked “PLAT”, GIA report number laser inscribed on the diamond’s girdle, ring size 4.5, 7.6 grams total weight.
- e. ROLEX DAY-DATE 36 PRESIDENT AUTOMATIC 18K YELLOW GOLD BRACELET WATCH - 36mm model, reference no. 118238, serial no. D74N6565, round mother of pearl and diamond dial, sapphire crystal with day and magnified date window, screw down crown, screw down case back, case no. 2098, 18K yellow gold fluted bezel, Rolex caliber 3155 automatic Swiss movement, movement serial no, 36U5F587, 18K yellow gold Rolex President Link bracelet, bracelet code 83208, with “fat buckle” folding clasp, clasp code E3P, 161.9 grams total weight.
- f. AN AFTERMARKET SILVER METAL AND DIAMOND BEZEL FOR 36MM ROLEX WATCHES - Channel-set with thirty-nine (39) round brilliant cut diamonds, G-H color, SI2-I2 clarity, approximately 3.00 carats total weight, 5.5 grams total weight.

- g. A 14K WHITE GOLD AND DIAMOND TENNIS BRACELET - Containing thirty (30) round brilliant cut diamonds, F color, VVS-VS clarity, approximately 12.00 carats total weight, marked "14K", 6.5 inches in length, 21.1 grams total weight.
- h. A 2015-P 1 OZ. AUSTRALIAN GOLD LUNAR "YEAR OF THE GOAT" \$100 COIN - 1 ounce 0.999 fine gold, \$100 denomination, minted in 2015 at the Australian Perth Mint, 31.1 grams total weight.
- i. A COUNTERFEIT "CARTIER" 18K YELLOW GOLD AND DIAMOND "LOVE" STYLE BRACELET - Bezel-set with four (4) round brilliant cut diamonds, D-F color, VVS clarity approximately 0.42 carats total weight, marked with counterfeit logo and numbered "©Cartier 16 FNK881 Au750 CSA", 5.94 mm wide, 29.6 grams total weight, with counterfeit "Cartier" branded screwdriver and box.
- j. HERMÈS GRAND ATTELAGE 16-PIECE YELLOW GOLD-PLATED STAINLESS-STEEL FLATWARE - Hermès Grand Attelage flatware pieces, sealed in original packaging (with the exception of 1 (one) spoon), each marked "HERMÈS - PARIS", together in one (1) Hermès box.
- k. A ROLEX "HULK" SUBMARINER DATE STAINLESS STEEL BRACELET WATCH - 40mm model, reference no. 116610LV, serial no. 3U67F120, circular "Hulk" green ceramic dial and bezel, sapphire crystal with magnified window for date and laser-etched Rolex Crown logo, screw down crown, stainless steel Oyster case, case no. 2360, Rolex caliber 3135

automatic Swiss movement with Quickset date, movement serial no. 15W876S2, stainless steel Rolex Oyster bracelet, bracelet code 97200, P4J, with folding Oysterlock clasp, clasp code 200, 148.9 grams total weight.

1. **ROLEX PRESIDENT DAY-DATE 18K ROSE GOLD BRACELET WATCH** - 40mm model, reference no. 228235, serial no. 94S529S5, circular chocolate diagonal motif dial with day and date apertures, sapphire crystal with magnified window for date and laser-etched Rolex Crown logo, 18k Everose gold fluted bezel, 18k Everose gold Oyster case, screw-down crown, Rolex automatic Swiss movement with Double Quickset day and date, 18k Everose gold Rolex President bracelet, bracelet code 83415 F2, with concealed folding Crown clasp, clasp code D1J, 195.7 grams total weight.

SEIZED ITEMS AT THE VINE STREET APARTMENT

160. On December 12, 2023, a search warrant in the Central District of California was executed on BREGMAN's Vine Street Apartment and the following items were seized:
 - a. Cash in the amount of \$4,698,314.00.
 - b. **ROLEX DAYTONA CHRONOGRAPH** – 18K Everose™ gold Rolex Daytona, reference #116505, serial #815X7837, features a black chronograph dial with rose gold registers, an oyster bracelet, and a tachymeter bezel. Accompanied by the boxes and the International Warranty card. Two Everose™ gold links and pins are included in the box with the retail hangtags. Item weight: 205.06 gm.

- c. AP ROYAL OAK OFFSHORE CHRONOGRAPH – 18K rose gold
Audemars Piguet Royal Oak Chronograph, reference
#25940OK.OO.D002CA.01, serial #G29759, features an anthracite gray
chronograph dial with a gold pattern, a black rubberized bezel with stainless
steel hexagonal screws, and a black rubber strap with 18K rose gold
deployment buckle with integrated AP logo. Item weight: 225.15 gm.
- d. PATEK PHILIPPE AQUANAUT – 18K rose gold Patek Philippe Aquanaut,
reference #5167R, serial #7229022, features an automatic movement with
power reserve. The date window is at 3 o'clock on the dark brown grid dial.
The grid texture is repeated on the brown rubber strap with 18K rose gold
deployment clasp. Item weight: 120.94 gm.

- 161. During a post-*Miranda* interview, BREGMAN admitted that the cash (\$4,698,314.00) in
the Vine Street Apartment derived from the sale of marijuana.
- 162. BREGMAN also indicated that prior to California making marijuana legal for
recreational use, he was producing THC extract and vape cartridges without a license.
- 163. During the same interview BREGMAN indicated that the money was “old money” from
his dispensaries when they used to make money.
- 164. BREGMAN indicated that the total amount of cash he had in his apartment was 2 to 2.5
million, however the actual final count of cash in the apartment was \$4,698,314.00.
- 165. HSI seizure records indicate that on October 1, 2021, bulk cash in the amount of
\$49,000.00 was seized from a FedEx package at a FedEx facility in Riverside California.

166. The package was destined to Adam BREGMAN at the FLORIDA RESIDENCE. The currency was labeled with “ACE” which is a known alias of BREGMAN. BREGMAN did not make a claim for the \$49,000.00.
167. CD-3 stated that in 2012 or 2013, CD-3 purchased a Rolex watch for BREGMAN using marijuana proceeds. That Rolex was not located in the collection seized in California or in the collection seized in Florida.
168. An HSI administrative subpoena was issued to Neils Kantor, an art dealer who sold Adam BREGMAN the KAWS and Andy Warhol paintings. Niels Kantor indicated that the paintings were purchased with cash by Adam BREGMAN.

SEIZURE OF \$205,358.00 FROM RAGO WRIGHT ACCOUNT XXX061

169. In November 2023, CD-3 discovered items CD-3 believed to still be in REJA’s collection. These items were listed on the LA Modern auction website, to be auctioned in mid-November.
170. CD-3 provided a list of about 35 items listed for sale at the LA Modern auction which CD-3 either purchased for REJA after receiving cash or were known to CD-3 as to be owned by REJA. CD-3 knew REJA primarily purchased fine art, fine furniture, and collectables with cash.
171. HSI issued an administrative subpoena on Rago Wright, parent company of LA Modern auction. Rago Wright provided documents under cosigner account number XXX061. Rago Wright also provided REJA’s historical purchase records.
172. Historical records of REJA’s purchase history at LA Modern auction indicate between 2010 and 2022, REJA purchased about \$900,000.00 worth of fine art, fine furniture, and

collectibles from LA Modern. LA Modern records indicate that those payments were all made in cash and that Nicole Branch was responsible for making some of the cash payments to LA Modern on behalf of REJA.

173. LA Modern cosigner number XXX061 belongs to Giacomo Tosti at 137 N Larchmont Blvd #717, Los Angeles, CA 90004. Giacomo Tosti is the elderly father in-law of REJA and the father of REJA's wife, F. TOSTI. The address provided is a postal box at a third-party postal box company.
174. Rago Wright documents indicate there were approximately 40 items listed under cosigner account number XXX061. Pictures of the items listed under cosigner account number XXX061, were matched against pictures available to law enforcement and CD-3 from REJA's family home at the LAS PALMAS RESIDENCE and the SEWARD RESIDENCE.
175. On October 30, 2023, the District of Nebraska Seizure warrant 8:23MJ545 authorized law enforcement to seize the net proceeds from the sale of the LAS PALMAS RESIDENCE.
176. These pictures concluded that at least a dozen or more of the items listed under cosigner account number XXX061 were displayed at two of REJA's known properties in Los Angeles.
177. CD-3 indicated CD-3 originally purchased at least 12 of the 40 items in cosigner account number XXX061 for REJA, which REJA paid CD-3 in cash.
178. REJA's cash purchase history with Rago Wright were analyzed against the 40 items in the cosigner account number XXX061. This analysis identified approximately six items

REJA purchased with cash from Rago Wright, which were listed in the cosigner account number XXX061.

179. Documents provided by Rago Wright/LA Modern indicate that the 40 items listed by the cosigner account number XXX061 were sold and the account had net proceeds due to consignor of \$205,358.00.
180. Rago Wright indicated that the Rago Wright employee who set up the sale for cosigner account number XXX061 was Giacomo Tosti. The employee indicated that Giacomo Tosti sounded very elderly and like he was being coached by someone next to him.
181. In early December 2023, CD-3 had a meeting with F. TOSTI. During that meeting, F. TOSTI told CD-3 that she wanted to sell the majority of REJA art collection. F. TOSTI was afraid that the government would seize the proceeds and she wanted to wait until the funds from the LA Modern sale were saved before she listed any other items for sale with CD-3.
182. Based on the aforementioned facts, the sold items in the Rago Wright cosigner account number XXX061 belonging to Giacomo Tosti contained illegal proceeds from marijuana sales.
183. On December 19, 2023, pursuant to a District of Nebraska Seizure Warrant, served on Rago Wright cosigner account number XXX061 Giacomo Tosti, HSI seized \$205,358.00.

Claim for Relief

WHEREFORE the United States of America prays the Defendant properties be proceeded against for forfeiture in accordance with the laws, regulations and rules of this Court; that due notice be given to all interested parties to appear and show cause why forfeiture should

not be decreed; that the Defendant properties be condemned, as forfeited, to the United States of America and disposed of according to law and regulations; that the costs of this action be assessed against the Defendant properties; and for such other and further relief as this Court may deem just and equitable.

UNITED STATES OF AMERICA,
Plaintiff

SUSAN T. LEHR
United States Attorney

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