

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	
)	
\$2,569.70 IN UNITED STATES)	Case No.:
CURRENCY FROM E*TRADE)	
ACCOUNT ENDING IN 5644)	
)	
and)	
)	
\$5,503,376.88 IN UNITED)	
STATES CURRENCY FROM)	
E*TRADE ACCOUNT ENDING)	
IN 2457)	
)	
Defendants.)	

VERIFIED COMPLAINT FOR FORFEITURE IN REM

Comes now the United States of America, by and through its counsel, Jay E. Town, United States Attorney for the Northern District of Alabama, and the undersigned Assistant United States Attorneys, and respectfully shows the Court the following in support of its Complaint for Forfeiture:

1. This is a civil action *in rem* for the forfeiture of the following assets (the Defendant Assets) per 18 U.S.C. § 981(a)(1)(C) because they are property that constitutes or is derived from proceeds traceable to a violation or conspiracy to

violate 18 U.S.C. § 1343 (wire fraud) and 18 U.S.C. § 1957 (engaging in monetary transactions in property derived from specified unlawful activity):

- **\$2,569.70 in United States Currency seized from an E*TRADE account ending in 5644; and**
- **\$5,503,376.88 in United States Currency seized from an E*TRADE account ending in 2457.**

2. The Court has jurisdiction over this subject matter per 28 U.S.C. §§ 1345 and 1355.

3. This Court has *in rem* jurisdiction over the Defendant Assets per 28 U.S.C. § 1355.

4. This Court has venue over this action per 28 U.S.C. §§ 1355 and 1395.

Background

5. Oak Landing Assisted Living Facility is a licensed Assisted Living Facility as defined by the Alabama State Board of Health, Alabama Department of Public Health, Division of Licensure and Certification (Chapter 420-5-4).

6. According to the Alabama State Board of Health, Alabama Department of Public Health, Division of Licensure and Certification, Chapter 420-5-4.05,

No member of the assisted living facility governing authority, and no employee of an assisted living facility, including the administrator, shall

serve as legal guardian, as conservator, or as attorney-in-fact for any resident of the facility, nor shall any such individual solicit or accept control over the property of any resident, such as by becoming authorized to sign checks for the resident, or by becoming authorized to enter a resident's safe deposit box, or by having authority to control real property or securities owned by the resident. No member of the assisted living facility governing authority, and no employee of an assisted living facility, including the administrator, shall accept gifts, cash, or any item of value from a resident of the assisted living facility other than what the resident is obligated to pay the facility for services rendered, as specified in the resident's financial agreement with the facility. Provided, however, that assisted living facility residents, sponsors, and family members may offer, and employees may accept, gifts whose value does not exceed \$25, on appropriate occasions such as holidays or birthdays if the gift is offered freely and voluntarily. In the case of a gift from a resident, the resident must have sufficient cognitive ability to knowingly, freely, and voluntarily offer a gift. Provided further, that none of these prohibitions shall apply between a resident and any member of the governing authority or employee if the two individuals are related to one another as defined in Section 420-5-4-01.(2)(b). Notwithstanding the foregoing, individuals appointed before October 5, 2001, as legal guardians for assisted living facility residents may continue to serve.

7. From on or about November 8, 2013, and continuing through July 2017, Lisa Daugherty was a salaried employee, and most recently, the Unit Coordinator of Oak Landing Assisted Living Facility in Attalla, Alabama, which is within Etowah County, Alabama, within the Northern District of Alabama.

8. Morris Steinberg was a medical doctor in Gadsden, Alabama. In his later years, he became a resident of Oak Landing Assisted Living Facility located in Attalla, Alabama. Initially, his wife, Linda Steinberg, still resided in their marital home in Gadsden, Alabama.

9. From on or about December 2015 and continuing through December 2016, Linda Steinberg paid Lisa Daugherty, Unit Coordinator of Oak Landing Assisted Living, and others to sit with Morris Steinberg in his room at Oak Landing over the course of the last year of his life.

10. On or about November 7, 2016, Lisa Daugherty, Unit Coordinator of Oak Landing Assisted Living, met with Linda Steinberg and was ultimately named in Linda Steinberg's will as the sole beneficiary to receive all of Steinberg's property, both real and personal, upon Steinberg's death. Steinberg's will was prepared by Gadsden attorney S.M.

11. In November 2016, Linda Steinberg fell in her yard and injured her hip. This traumatic injury required surgery and subsequent in-patient rehabilitation. While Steinberg was in the hospital, the Unit Coordinator of Oak Landing Assisted Living, Lisa Daugherty, offered and did subsequently bring to Steinberg her mail and checkbooks.

12. A few days after falling in her yard, on November 16, 2016, while Linda Steinberg was still confined to Gadsden Regional Hospital, Lisa Daugherty, the Unit Coordinator of Oak Landing, obtained power of attorney for Linda Steinberg. This durable power of attorney was prepared for Daugherty by Gadsden attorney C.H.

13. On December 10, 2016, while Linda Steinberg was still in rehabilitation, Dr. Morris Steinberg died. Following the death of Dr. Steinberg, Lisa Daugherty arranged for Mrs. Steinberg to move into the room previously occupied by Dr. Steinberg at Oak Landing Assisted Living Facility.

14. On or about January 10, 2017, a more exact date being unknown, Linda Steinberg was moved into the room previously occupied by her husband at Oak Landing Assisted Living Facility.

15. Although Linda Steinberg moved into Oak Landing Assisted Living Facility where Lisa Daugherty was the Unit Coordinator, Daugherty continued her fiduciary relationship (power of attorney) with Mrs. Steinberg in violation of Alabama law.

16. On or about December 3, 2018, a more exact date being unknown, Linda Steinberg addressed a hand-written letter to her cousin, Dr. Lloyd Mendelson, in which she chronicled the “*trickery*” involved in relinquishing the power of attorney (POA) to Lisa Daugherty. Steinberg noted that all of the funds in her Merrill Lynch accounts were “*removed to another company with lies told to me,*” and expressed concerns that Daugherty, through a ruse, had obtained the deeds to all of her real property. Steinberg continued, “*I signed nothing to my knowledge that allowed her (Lisa Daugherty) to take anything.*”

17. After receiving the letter from Linda Steinberg, Dr. Lloyd Mendelson contacted Weaver-Tidmore, a Birmingham-based law firm, as well as local law enforcement to conduct a welfare check of Linda Steinberg and to assist with removing her from Oak Landing Assisted Living Facility.

18. On December 5, 2018, Linda Steinberg signed a document revoking the general power of attorney previously provided to Lisa Daugherty. Steinberg subsequently signed a document granting a durable power of attorney to her cousin, Dr. Lloyd Mendelson. The signing of these documents were witnessed by both a law enforcement officer with the Etowah County Sheriff's Department as well as a notary.

19. On or about December 7, 2018, a more exact date being unknown, Dr. Mendelson requested an ambulance service to transport Linda Steinberg from Oak Landing Assisted Living Facility to Gadsden Regional Medical Center to conduct a welfare check; however, for reasons that are unclear, Linda Steinberg was transported from Oak Landing Assisted Living Facility to the Psychiatric Unit at Gadsden Regional Medical Center for a psychiatric evaluation.

20. On or about December 10, 2018, while Linda Steinberg was being held in the psychiatric unit of Gadsden Regional Medical Center, Lisa Daugherty, Unit Coordinator at Oak Landing Assisted Living Facility, filed an emergency

petition for Letters of Guardianship and Conservatorship for Linda Steinberg before the Judge of Probate, Bobby Junkins, Etowah County, Alabama. Within this petition and while under oath, Daugherty stated the value of Steinberg's estate and holdings at approximately \$311,200.

21. On December 28, 2018, Linda Steinberg was ultimately released from Gadsden Regional Medical Center and moved into another assisted living facility within the Northern District of Alabama.

22. On, January 8, 2019, law enforcement met with Linda Steinberg.

23. Linda Steinberg told law enforcement, during this meeting, that while she was confined to Gadsden Regional Hospital for injuries sustained at her residence, she relinquished power of attorney (POA) and deeded her real property over to Lisa Daugherty to assist her with paying bills and settling Steinberg's finances, and for no other reason. Steinberg stated that she did not knowingly or willingly give or intend to give Daugherty the authorization to sell any real property or to liquidate her bank and investment accounts.

24. On April 1, 2019, following a jury trial, Etowah County Judge of Probate, Scott W. Hassell, entered an order for directed verdict in Steinberg's favor and dismissed Daugherty's petition for Letters of Guardianship and Conservatorship of Steinberg with prejudice.

The Fraudulent Scheme And Its Execution

25. Beginning in January 2017 and continuing through the present date, Lisa Daugherty, through the aforementioned power of attorney, obtained, liquidated, or converted for her own personal use most of the assets (cash, investment accounts, real and personal property) belonging to Linda Steinberg.

26. Lisa Daugherty used the vast majority of these funds not for the benefit of Mrs. Steinberg, as is required by the power of attorney, but rather for her own personal benefit; for the benefit of her two daughters, L.B.C. and L.K.E.; and for the benefit of her close friend J.J.

27. Lisa Daugherty used the monies—which are proceeds of wire-fraud and the crime of engaging in monetary transactions with property derived from wire fraud—to purchase, among other things: (1) a residence located at 525 Guy Lee Lake Road, Rainbow City, Alabama, within the Northern District of Alabama, for \$1,100,000 and the furnishings therein; (2) a beach-front house located at 2162 W. Beach Blvd., Gulf Shores, Alabama, for \$895,000 and the furnishings therein; (3) and hundreds of thousands of dollars worth of renovations and/or furnishings for former the Steinberg property located at 20077 Scenic Highway, Mentone, Alabama, within the Northern District of Alabama.

28. Lisa Daugherty used the power of attorney (POA) for Steinberg to

initially obtain and/or convert most of Steinberg's real property and to liquidate Steinberg's investment and bank accounts and holdings while she (Daugherty) was a Unit Coordinator of Oak Landing Assisted Living Facility where Steinberg was a resident; in violation of Alabama Law as well as the letter and intent of the durable power of attorney (POA).

29. In July 2017, Lisa Daugherty resigned her employment at Oak Landing Assisted Living Facility. Since July 2017, Daugherty has not, upon information and belief, been gainfully employed. Over the course of the past 24 months, Daugherty's only source of income, upon information and belief, is the monies and assets she obtained fraudulently through the liquidation and/or conversion of Steinberg's assets (cash, investment accounts, real and personal property).

30. Over the course of this criminal scheme, and subsequent to the liquidation of Linda Steinberg's Merrill Lynch, Fidelity, and Scottrade Investment accounts, as well as through the sales of Steinberg's real property, Lisa Daugherty conducted, through financial institutions, some of which are FDIC-insured, and all of which operated in more than one state and/or otherwise acted in interstate commerce, numerous interstate wire transactions involving wire-fraud proceeds that exceeded \$10,000. Each transaction, therefore, represents a violation of 18

U.S.C. §§ 1343 and 1957, and the proceeds involved in each transaction are thus subject to civil forfeiture under the statutory authority outlined in this complaint.

31. From in or around November 6, 2016, and continuing through in or around April 19, 2019, in the Southern and Northern Districts of Alabama and elsewhere, Lisa Daugherty, Unit Coordinator of Oak Landing Assisted Living Facility, and possibly others, devised and intended to devise a scheme and artifice to defraud, and obtain money and property of Linda Steinberg by means of false and fraudulent pretenses, representations, and promises.

32. It was part of the scheme and artifice to defraud that Lisa Daugherty, through her employment as Unit Coordinator for Oak Landing Assisted Living Facility, in an effort to fraudulently enrich herself and others, did obtain, through false and fraudulent pretenses, power of attorney (POA) for Linda Steinberg, then did subsequently embezzle, misapply, and divert funds belonging to Linda Steinberg, by means of electronic fund transfers, checks, and wire transfers, to her personal bank and investment accounts, and the personal bank accounts of her daughters, L.B.C. and L.K.E.; and for the benefit of her close friend J.J.

33. It was part of the scheme and artifice to defraud that in November 2016, Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, traveled to Gadsden Regional Medical Center to meet

with Linda Steinberg within a few days of Mrs. Steinberg falling and breaking her hip.

34. It was further part of the scheme and artifice to defraud that while Lisa Daugherty met with Linda Steinberg at Gadsden Regional Medical Center, she informed Mrs. Steinberg that the prognosis for Steinberg's husband, Dr. Morris Steinberg, who was a resident at Oak Landing Assisted Living Facility and in rapidly-declining physical and mental health, was not good.

35. It was further part of the scheme and artifice to defraud that while Lisa Daugherty met with Linda Steinberg at Gadsden Regional Medical Center, she convinced Mrs. Steinberg that the individual Mrs. Steinberg had previously selected to be her power of attorney did not have honorable intentions and was therefore untrustworthy.

36. It was further part of the scheme and artifice to defraud that while Lisa Daugherty met with Linda Steinberg at Gadsden Regional Medical Center, that she convinced Mrs. Steinberg that she (Steinberg) needed to appoint a new power of attorney (POA) because of Steinberg's impending hip surgery and subsequent rehabilitation, in order to remain current with paying bills, in order to settle finances, and generally, for the current and future care of both Linda Steinberg and her husband Dr. Morris Steinberg.

37. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, through false and fraudulent pretenses, did obtain power of attorney (POA) for Linda Steinberg while Steinberg was confined to Gadsden Regional Medical Center.

38. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, did obtain the keys to the Gadsden, Alabama residence of Linda Steinberg, thereby gaining access to and knowledge of the vast Steinberg estate and holdings.

39. It was further part of the scheme and artifice to defraud that after Dr. Morris Steinberg died, Lisa Daugherty, Unit Coordinator of Oak Landing Assisted Living Facility, arranged for Linda Steinberg to move into the room previously occupied by Dr. Steinberg at Oak Landing Assisted Living Facility.

40. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, continued her fiduciary relationship (POA) with Linda Steinberg after Linda Steinberg moved into Oak Landing Assisted Living Facility in violation of Alabama law.

41. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, used the power of attorney (POA) for Linda Steinberg to gain access to previously established bank and investment accounts of Dr. Morris Steinberg and Linda Steinberg at Regions Bank, Compass Bank, Merrill Lynch, Scottrade, and Fidelity Investments.

42. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, used the power of attorney (POA) to establish new bank and investment accounts for Linda Steinberg and herself at Regions Bank, Compass Bank, and Trust Company of America (E*TRADE).

43. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, obtained the deeds to many of Linda Steinberg's real property and holdings, through false and fraudulent pretenses, while Linda Steinberg was a resident of Oak Landing Assisted Living Facility, and subsequently sold all but one of the these properties, then deposited the proceeds of the sales of these fraudulently-obtained properties into her Regions Bank and or BBVA Compass bank accounts.

44. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, consulted with and subsequently retained T.G., Goggans Investment Group, Inc., of Gadsden, Alabama, as her financial advisor.

45. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, met with and convinced Linda Steinberg, who was a resident of Oak Landing Assisted Living Facility, that the individual who previously had power of attorney (POA) for Steinberg was attempting to take Steinberg's money that was being held in Merrill Lynch investment accounts and that "*they* (investment accounts) *had to be moved.*"

46. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, wired the funds previously held in Linda Steinberg's Merrill Lynch investment accounts to newly-opened accounts held in her name and Linda Steinberg's name with Trust Company of America (E*TRADE). These wire transactions were conducted by Daugherty through the investment services of T.G., dba, Goggans Investment Group Inc.

47. It was further part of the scheme and artifice to defraud that Lisa

Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, opened Trust Company of America (**E*TRADE**) **account *2457** in her name only.

48. It was further part of the scheme and artifice to defraud that Lisa Daugherty, while employed as the Unit Coordinator of Oak Landing Assisted Living Facility, after wiring the funds previously held in Linda Steinberg's Merrill Lynch accounts into joint accounts with Steinberg at Trust Company of America (**E*TRADE**), transferred approximately \$5,792,126.68 in cash, stocks, and mutual funds from those joint Trust Company of America (**E*TRADE**) accounts held with Steinberg into her own personal **E*TRADE account *2457**.

49. It was further part of the scheme and artifice to defraud that Lisa Daugherty then wired proceeds held in her personal **E*TRADE account *2457** into her personal bank accounts at BBVA Compass and Regions Bank, at varying times, to enrich herself and others in general, and to fund the purchase of her primary residence and other properties.

50. On January 13, 2017, Linda Steinberg, a resident of Oak Landing Assisted Living Facility, deeded the following real properties to Lisa Daugherty while Daugherty was the Unit Manager of Oak Landing Assisted Living Facility in violation of Alabama law. These documents deeding the following properties

from Linda Steinberg to Lisa Daugherty were prepared by Gadsden Attorney S.M.:

- Riverview Heights Subdivision, lots 8-12 on Whippoorwill Drive, located in Etowah County, Alabama;
- Property on Lakewood Drive, Gadsden, Alabama, and additional property located in Clubview Heights Subdivision (a portion of farm tracts one (1), two (2), three (3), and an addition to a portion of farm tract four (4)), all located in Etowah County, Alabama;
- 20077 Scenic Highway, Mentone, Alabama located in Dekalb County, Alabama;
- Property on S. 3rd Street, Gadsden, Alabama located in Etowah County, Alabama.

51. On January 17, 2017, Linda Steinberg, a resident of Oak Landing Assisted Living Facility, deeded the following real properties to Lisa Daugherty while Daugherty was the Unit Manager of Oak Landing Assisted Living Facility in violation of Alabama law. These documents deeding the following real properties from Linda Steinberg to Lisa Daugherty were prepared by Gadsden Attorney S.M.:

- Tract number 4, Canyon View Forest, located in Cherokee County, Alabama;
- Tract numbers 2 and 17 of Valley View Forest Section of Canyon View Forest, located in Cherokee County, Alabama.

52. On January 17, 2017, Lisa Daugherty wrote a Regions Bank check in the amount of \$1,050, check # 6331, drawn on Regions Bank account *4858, to Gadsden attorney S.M. In the memo line of this document Daugherty wrote,

“paperwork deeds.”

53. On August 24, 2017, Lisa Daugherty sold the former Steinberg property located on South 3rd Street, Gadsden, for \$37,000. Daugherty deposited the proceeds from the sale of this property on August 21, 2017, into Compass Bank account *0186 held in the name Estate of N.T. (Daugherty’s father). Continuing on the same date, Daugherty transferred these funds into her personal BBVA Compass Bank account *9012.

54. On October 25, 2018, Lisa Daugherty sold the former Steinberg property located in the Riverview Heights Subdivision, Whippoorwill Drive, for \$175,000. Daugherty deposited the proceeds of this transaction on this date into Compass Bank account *5339. On November 15, 2018, Daugherty transferred these funds into her personal BBVA Compass Bank account *9012. These funds, along with former Steinberg funds wired from Daugherty’s **E*TRADE account *2457** into Daugherty’s personal BBVA Compass Bank account *9012 , were used by Daugherty to purchase the residence located at 525 Guy Lee Lake Road, Rainbow City, Alabama, on November 16, 2018, for \$1,100,000 (\$655,000 in cash and \$445,000 in exchange of property).

55. On November 16, 2018, Lisa Daugherty sold Steinberg’s former primary residence located on Lakewood Drive, Gadsden, Alabama, for \$350,000.

Daugherty deposited the proceeds of this transaction on this date into her personal BBVA Compass Bank account *5339.

Creation of Trust Company of America (E*Trade) Accounts, and Liquidation of Steinberg's Merrill Lynch Accounts

56. On December 15, 2016, Lisa Daugherty successfully submitted the previously-obtained power of attorney for Mrs. Steinberg to Merrill Lynch Investments and subsequently assumed complete control over account *7705, in the name Linda M. Steinberg and Mendelson Properties, LLC; account *1634, in the name Linda F. Steinberg; account *0226, held in the name Linda F. Steinberg; and account *0582, held in the name Dr. Morris Steinberg and Linda M. Steinberg.

57. On January 10, 2017, Lisa Daugherty, through a previously obtained power of attorney (POA) for Steinberg, opened Trust Company of America (E*TRADE) account *5644, held in the name Linda F. Steinberg and Lisa Daugherty (POA) through the Goggans Group, Inc.

58. On January 10, 2017, Lisa Daugherty, through a previously-obtained power of attorney (POA) for Steinberg, opened Trust Company of America (E*TRADE) account *5918, held in the name Linda F. Steinberg, IRA, and Lisa Daugherty (POA) through the Goggans Group, Inc. Daugherty is also identified as the primary beneficiary for this account.

59. On January 11, 2017, Lisa Daugherty, through a previously-obtained

power of attorney (POA) for Steinberg, opened Trust Company of America (E*TRADE) account *5980, held in the name of Mendelson Properties, LLC through the Goggans Group, Inc.

60. From January 24, 2017, and continuing through November 24, 2017, Lisa Daugherty wired \$20,817.26 in cash and transferred \$234,413.35 in stocks and mutual funds from Linda Steinberg's Scottrade investment account *9588 and Fidelity Investment account *2108 into Trust Company of America (E*TRADE) account *5918, held in the name Linda F. Steinberg, IRA, and Lisa Daugherty (POA).

61. On February 1, 2017, Lisa Daugherty wired \$95,985.65 from Steinberg's Merrill Lynch account *1634 into Trust Company of America (E*TRADE) account *5644, held in the name Linda F. Steinberg and Lisa Daugherty.

62. On February 1, 2017, Lisa Daugherty wired \$333,864.45 in cash and transferred 6,926 shares of AFLAC Stock worth approximately \$484,750.74 (\$818,615.19 in aggregate) from Steinberg's Merrill Lynch account *0226 into E*TRADE account *5644, held in the name Linda F. Steinberg and Lisa Daugherty (POA).

63. On February 6, 2017, Lisa Daugherty transferred 55,456 shares of

AFLAC stock worth \$3,804,836.16 and \$23,546.33 in cash (\$3,828,287.49 in aggregate) from Steinberg's Merrill Lynch account *7705 into E*TRADE account *5980, held in the name of Mendelson Properties, LLC.

64. On February 17, 2017, Lisa Daugherty transferred 2,775 shares of AFLAC stock worth approximately \$197,552.75 and \$39,715.95 in cash (\$237,268.20 in aggregate) from Steinberg's Merrill Lynch account *0582 into **E*TRADE account *5644**, held in the name Linda F. Steinberg and Lisa Daugherty (POA).

65. On March 3, 2017, Lisa Daugherty opened Trust Company of America (**E*TRADE**) **account *2457**, held in the name Lisa Daugherty through the Goggans Group, Inc. L.B.C., Daugherty's daughter, was designated as the transfer on death (TOD) beneficiary for this account.

66. On March 20, 2017, Daugherty transferred the below stock holdings and cash into her personal **E*TRADE account *2457**. These transactions resulted in a net aggregate deposit of \$5,792,126.68 into Daugherty's personal **E*TRADE account *2457**. All of the below-listed assets originated from Linda Steinberg's holdings in Merrill Lynch investment accounts:

- 55,456 shares of AFLAC stock from E*TRADE account *5980;
- Various stock holdings from **E*TRADE account *5644**;

- \$40,000 in cash from E*TRADE account *5980; and
- \$315,000 in cash from **E*TRADE account *5644**.

67. On March 31, 2017, following the liquidation and transfer of Linda Steinberg's Merrill Lynch accounts, Lisa Daugherty's personal Trust Company of America (**E*TRADE**) **account *2457** had a balance of \$5,780,841.24 while Linda Steinberg's three Trust Company of America (E*TRADE) accounts had a collective balance of \$52,182.10.

Regions Bank / Account *7689

68. On or about January 26, 2017, Lisa Daugherty opened Regions Bank account *7689 held in the name Linda M. Steinberg and Lisa Daugherty (co-owner).

69. On or about February 3, 2017, Lisa Daugherty wired \$99,000 from Trust Company of America (**E*TRADE**) **account *5644**, in the name Linda F. Steinberg, to Regions Bank account *7689, in the name Lisa Daugherty and Linda M. Steinberg. This transaction was authorized and signed for by T.G., who had advisor authorization for this account up to \$99,999.99. **E*TRADE account *5644** was initially funded through the liquidation and transfer of Steinberg's funds previously held in Merrill Lynch accounts *0226, *1634, and *0582.

70. On or about February 7, 2017, Lisa Daugherty wired \$200,000 from

Trust Company of America (**E*TRADE**) **account *5644**, in the name Linda F. Steinberg, to Regions Bank account *7689, in the name Lisa Daugherty and Linda Steinberg. This Trust Company of America (E*TRADE) account was initially funded through the liquidation and transfer of Steinberg's funds previously held in Merrill Lynch account *0226 and account *1634.

71. From March 2017, and continuing through January 13, 2018, Lisa Daugherty wrote checks totaling \$226,865.23 for renovations, repairs, home décor, and installation of a pool at the former Steinberg residence, which is located at 20077 Scenic Highway, Mentone, Alabama. This property was deeded to Daugherty on January 13, 2017. These checks were drawn on Regions Bank account *7689 in the name of Linda Steinberg and Lisa Daugherty.

72. On June 26, 2017, Lisa Daugherty wired \$300,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty, to Regions Bank account *7689, in the name Lisa Daugherty and Linda Steinberg. This Trust Company of America (E*TRADE) account was initially funded by Steinberg's holdings in Merrill Lynch account *7705.

73. On March 27, 2018, Lisa Daugherty wired \$99,999.99 from Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty, to Regions Bank account *7689, in the name Lisa Daugherty and Linda Steinberg.

This Trust Company of America (E*TRADE) account was initially funded by Steinberg's holdings in Merrill Lynch account *7705.

74. On August 22, 2018, Lisa Daugherty wired \$99,999 from Trust Company of America (**E*TRADE**) **account *2457**, in the name of Lisa Daugherty, to Regions Bank account *7689, in the name of Lisa Daugherty and Linda Steinberg. This Trust Company of America (E*TRADE) account was initially funded by Steinberg's holdings in Merrill Lynch account *7705.

75. On October 9, 2018, Lisa Daugherty wired \$22,800 from Trust Company of America (**E*TRADE**) **account *2457**, in the name of Lisa Daugherty, to Regions Bank account *7689, in the name of Lisa Daugherty and Linda Steinberg. This Trust Company of America (E*TRADE) account was initially funded by Steinberg's holdings in Merrill Lynch account *7705.

76. On October 15, 2018, Lisa Daugherty wired \$12,114.97 from Trust Company of America (E*TRADE) account *5918, in the name Linda F. Steinberg IRA, to Regions Bank account *7689, in the name Lisa Daugherty and Linda Steinberg. This Trust Company of America (E*TRADE) account was initially funded by Steinberg's holdings in Scottrade Inc. and Fidelity Investment accounts.

77. On October 22, 2018, Lisa Daugherty wired \$87,886 from Trust Company of America (**E*TRADE**) **account *2457**, in the name of Lisa

Daugherty, to Regions Bank account *7689, in the name of Linda Steinberg and Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

78. On October 24, 2018, Lisa Daugherty wrote check *5200 in the amount of \$4,554.10, made payable to Premier Pools & Spa for the installation of a pool at 2162 W. Beach Blvd., Gulf Shores, Alabama. This check was drawn on Regions Bank account *7689, in the name Lisa Daugherty.

BBVA Compass / Account *9012

79. On August 21, 2015, Lisa Daugherty opened Compass Bank account *9012 in the name of Lisa Daugherty. No other person is listed, or has signature authority, for this BBVA Compass Bank account.

80. On June 28, 2017, Lisa Daugherty deposited BanCorp South check # 817, in the amount of \$50,000, made payable to her, drawn on BanCorp South account *1034, in the name J.J., into this Compass Bank account *9012. Two days earlier, on June 26, 2017, Lisa Daugherty wrote check # 1009 from Compass Bank account *4964 in the amount of \$50,000 made payable to J.J.

81. On August 24, 2017, Lisa Daugherty sold former Steinberg property located on South 3rd Street, Gadsden, Alabama, for \$37,000. On August 21, 2017,

Daugherty deposited the proceeds from the sale of this property into Compass Bank account *0186 in the name, Estate of N.T. (Daugherty's father), then transferred these funds, on the same date, into Compass Bank account *9012 in the name Lisa Daugherty.

82. On September 20, 2017, Lisa Daugherty wired \$694,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

83. Beginning in December 2017 and continuing through December 2018, Lisa Daugherty wrote checks totaling at least \$57,149.03 for repairs, home décor, and installation of a pool at 20077 Scenic Highway, Mentone, Alabama. Lisa Daugherty received the deed to this property on January 13, 2017. These checks were drawn on BBVA Compass Bank account *9012 in the name Lisa Daugherty.

84. On March 16, 2018, Lisa Daugherty transferred \$1,100,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa

Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

85. On May 1, 2018, Lisa Daugherty transferred \$30,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

86. On May 3, 2018, Lisa Daugherty transferred \$975,000 from BBVA Compass Bank account *9012, in the name Lisa Daugherty, to Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty.

87. On May 7, 2018, Lisa Daugherty wrote check # 1116, in the amount of \$10,000, made payable to Keller Williams AGC. This check was drawn on BBVA Compass Bank account *9012, in the name Lisa Daugherty. In the memo line of this document Daugherty wrote, "*Ernest Money 2162 W Beach Blvd Gulf Shores.*"

88. On May 10, 2018, or approximately 7 days later, Lisa Daugherty transferred \$975,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty, to BBVA Compass Bank account *9012, in

the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

89. On May 18, 2018, Lisa Daugherty purchased 2162 West Beach Blvd., Gulf Shores, Alabama, for \$895,000. Lisa Daugherty wired funds from BBVA Compass Bank account *9012, to the Regions Bank account belonging to Clark Partington Hart & Hart LLC, Orange Beach, Alabama, for the purchase of this residence. These funds were previously wired to this BBVA Compass Bank account from Daugherty's personal **E*TRADE account *2457**, which was initially funded through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

90. On May 18, 2018, Lisa Daugherty wrote check # 1118, from her Compass Bank account, account *9012, in the amount of \$10,680.56, made payable to Metlife Auto & Home Insurance Agency. In the memo line of this document Daugherty wrote "*2162 W. Beach Blvd Insurance.*"

91. On May 30, 2018, Lisa Daugherty wrote check # 1120 in the amount of \$1,000; on July 27, 2018, Lisa Daugherty wrote check # 1178 in the amount of \$17,262.30; and August 3, 2018, Lisa Daugherty wrote check # 905169 in the amount of \$13,662.30. All of these checks, totaling \$31,924.60, were made

payable to Premier Pools & Spa for the installation of a pool at 2162 W. Beach Blvd., Gulf Shores, Alabama, and were drawn on BBVA Compass Bank account *9012, in the name Lisa Daugherty.

92. On June 4, 2018, Lisa Daugherty wired \$30,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

93. On July 2, 2018, Lisa Daugherty wired \$30,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name of Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty on March 3, 2017, through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

94. On August 1, 2018, Lisa Daugherty wired \$30,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name of Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa

Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

95. On September 4, 2018, Lisa Daugherty wired \$30,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name of Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

96. On October 1, 2018, Lisa Daugherty wired \$30,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name of Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

97. On November 1, 2018, Lisa Daugherty wired \$30,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name of Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda

Steinberg's Merrill Lynch account *7705.

98. On November 5, 2018, Lisa Daugherty wrote check # 1228, in the amount of \$10,000. This check was drawn on BBVA Compass Bank account *9012, in the name Lisa Daugherty. In the memo line of this document, Daugherty wrote, "*Earnest Money / 525 Guy Lee Lake Rd Rainbow City.*"

99. On November 15, 2018, Lisa Daugherty wired \$300,000 from Trust Company of America (**E*TRADE**) **account *2457**, in the name Lisa Daugherty, to BBVA Compass Bank account *9012, in the name Lisa Daugherty. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

100. On November 16, 2018, Lisa Daugherty wrote check # 1234, in the amount of \$2,709.51, made payable to Copeland Law, LLP. This check was drawn on BBVA Compass Bank account *9012, in the name Lisa Daugherty. In the memo line of this document, Daugherty wrote, "*Closing Guy Lee.*"

101. Continuing on November 16, 2018, Lisa Daugherty wired \$645,000 from BBVA Compass Bank account *9012, to the Alabama Teacher's Credit Union account belonging to the Copeland Law, LLP, to purchase 525 Guy Lee Lake Road, Rainbow City, Alabama.

BBVA Compass / Account *4964

102. On January 17, 2017, Lisa Daugherty provided the previously-obtained durable power of attorney for Linda Steinberg to open Compass Bank account *4964 held in the name Linda Steinberg and Lisa Daugherty (POA).

103. On February 23, 2017, Lisa Daugherty deposited Fidelity Investments and Life Insurance check *7443 in the amount of \$2,603.37, made payable to Linda Steinberg, into Compass Bank account *4964.

104. On March 1, 2017, Lisa Daugherty deposited Aflac check # 2637767 in the amount of \$11,152.91, made payable to Linda Frances Mendelson Steinberg, into Compass Bank account *4964.

105. On April 3, 2017, Lisa Daugherty deposited Fidelity Investments and Life Insurance check # 924740533 in the amount of \$4,115.21, made payable to Linda F. Steinberg, into this Compass Bank account *4964.

106. On April 11, 2017, Lisa Daugherty deposited Fidelity Investments and Life Insurance check # 0703629 in the amount of \$132,678.10, and Fidelity Investments and Life Insurance check # 703630, in the amount of \$5,395.48 (\$138,073.58 in aggregate) both made payable to Linda Steinberg, into Compass Bank account *4964.

107. On April 17, 2017, Lisa Daugherty deposited Fidelity Investments and

Life Insurance check # 703669 in the amount of \$2,546.09, made payable to Linda Steinberg, into Compass Bank account *4964.

BBVA Compass / Account *5339

108. On October 24, 2018, Lisa Daugherty opened BBVA Compass Bank account *5339 in the name of Lisa Daugherty. No other person is listed, or has signature authority, for this BBVA Compass Bank account.

109. On October 24, 2018, Lisa Daugherty transferred \$225,000 from Compass Bank account *9012 into Compass Bank account *5339. This money, in turn, was derived from \$30,000 wire transfers from Trust Company of America (E*TRADE) account *2457 into Compass Bank account *9012.

110. On October 25, 2018, Lisa Daugherty sold former Steinberg property located in the Riverview Heights Subdivision, Whippoorwill Drive, for \$175,000. Daugherty received the proceeds of the sale of this residence, \$158,957.72 (net), and deposited the same into BBVA Compass Bank account *5339 on the same date.

111. On November 15, 2018, Lisa Daugherty transferred \$288,000 from Compass Bank account *5339 to her Compass Bank account *9012.

112. On November 16, 2018, Lisa Daugherty sold Steinberg's former primary residence located on Lakewood Drive, Gadsden, Alabama for \$350,000.

Daugherty received the proceeds of the sale of this residence, \$328,434.96 (net), and deposited the same into Compass Bank account *5339 on the same date.

Purchase of 525 Guy Lee Lake Road

113. On November 5, 2018, Lisa Daugherty wrote check # 1228, from her Compass Bank account *9012, in the amount of \$10,000. In the memo line of this document Daugherty wrote, “*525 Guy Lee Lake Road Rainbow City/ Earnest money.*”

114. On November 15, 2018, Lisa Daugherty transferred \$288,000 from Compass Bank account *5339 into her Compass Bank account *9012.

115. On November 15, 2018, Lisa Daugherty transferred \$300,000 from **E*TRADE Account *2457** into her BBVA Compass Bank account *9012. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg’s Merrill Lynch account *7705.

116. On November 16, 2018, Lisa Daugherty purchased 525 Guy Lee Lake Road, Rainbow City, Alabama, within Etowah County, within the Northern District of Alabama, for \$1,100,000 (\$645,000 in cash, \$10,000 check, as well as \$445,000 in exchange of like kind properties located in Etowah and St. Claire County, Alabama). Lisa Daugherty wired \$647,610.62 from BBVA Compass

Bank account *9012, to the Alabama Teacher's Credit Union account belonging to the Copeland Law, LLP, to purchase this residence.

117. On November 16, 2018, Lisa Daugherty wrote check #1234, from her BBVA Compass Bank account *9012, in the amount of \$2,709.51, made payable to Copeland Law, LLP. In the memo line of this document Daugherty wrote, "*Closing Guy Lee.*"

Purchase of 2162 West Beach Blvd

118. On May 7, 2018, Lisa Daugherty wrote check # 1116, from her Compass Bank account *9012, in the amount of \$10,000, made payable to Keller Williams AGC. In the memo line of this document Daugherty wrote, "*Ernest Money / 2162 W. Beach Blvd Gulf Shores.*"

119. On May 10, 2018, Lisa Daugherty transferred \$975,000 from **E*TRADE account *2457** into her Compass Bank account *9012. This Trust Company of America (E*TRADE) account was initially funded by Lisa Daugherty in March 2017 through the liquidation and ultimate transfer of Linda Steinberg's Merrill Lynch account *7705.

120. On May 18, 2018, Lisa Daugherty purchased 2162 West Beach Blvd., Gulf Shores, Alabama, for \$895,000. Lisa Daugherty wired the funds from BBVA Compass Bank account *9012 to the Regions Bank account belonging to

Clark Partington Hart & Hart LLC, Orange Beach, Alabama, for the purchase of this residence.

121. On May 18, 2018, Lisa Daugherty wrote check # 1118, from Compass Bank account, account *9012, in the amount of \$10,680.56, made payable to Metlife Auto & Home Insurance Agency. In the memo line of this document Daugherty wrote “*2162 W. Beach Blvd Insurance.*”

122. On May 30, 2018, Lisa Daugherty wrote check # 1120, from Compass Bank account *9012, in the amount of \$1,000, made payable to Premier Pools. In the memo line of this document Daugherty wrote “*2162 W. Beach down payment.*”

123. On July 27, 2018, Lisa Daugherty wrote check # 1178, from Compass Bank account *9012, in the amount of \$17,262.30, made payable to Premier Pools. In the memo line of this document Daugherty wrote, “*Retaining wall \$3600 / 1st Draw 13,662.30 / Balance 31,898.70.*”

124. On August 3, 2018, Lisa Daugherty wrote check # 905169, from Compass Bank account *9012, in the amount of \$13,662.30, made payable to Premiere Pools & Spas.

125. On October 24, 2018, Lisa Daugherty wrote check # 995200, from Regions Bank account *7689, in the amount of \$4,554.10, made payable to

Premier Pools & Spas.

Conversion Of 20077 Scenic Highway

126. On January 13, 2017, Lisa Daugherty, through false and fraudulent pretenses, was given the deed to Steinberg residence located at 20077 Scenic Highway, Mentone, Alabama (parcel # 10-08-33-0-001-002.000), by Linda Steinberg. This property is located in Dekalb County, Alabama, within the Northern District of Alabama. The documents memorializing this transaction were prepared by Gadsden Attorney S.M.

127. On March 20, 2017, Lisa Daugherty wrote check # 1027, from Regions Bank account *7689, in the amount of \$12,500. In the memo line of this document Daugherty wrote, “*10% down metone.*”

128. On July 4, 2017, Lisa Daugherty wrote check # 1056, from Regions Bank account *7689, in the amount of \$4,114.23, made payable to Rooms to Go. In the memo line of this document Daugherty wrote, “*Mentone #12138475.*”

129. On August 9, 2017, Lisa Daugherty wrote check # 1067, from Regions Bank account *7689, in the amount of \$112,500. In the memo line of this document Daugherty wrote, “*125,000 paid Mentone.*”

130. On October 17, 2017, Lisa Daugherty wrote check # 1137, from Compass Bank account *9012, in the amount of \$5,149, made payable to

Livingston Pools. In the memo line of this document Daugherty wrote, “*down payment pool.*”

131. On October 19, 2017, Lisa Daugherty wrote check # 1148, from Compass Bank account *9012, in the amount of \$13,590.13, made payable to Atkins Furniture. In the memo line of this document Daugherty wrote “*Mentone 9161934.*”

132. On October 26, 2017, Lisa Daugherty wrote check # 1304, from Regions Bank account *7689, in the amount of \$67,250. In the memo line of this document Daugherty wrote, “*Mentone.*”

133. On November 10, 2017, Lisa Daugherty wrote check # 1306, from Regions Bank account *7689, in the amount of \$9,700. In the memo line of this document Daugherty wrote, “*Mentone.*”

134. On November 10, 2017, Lisa Daugherty wrote check # 1151, Compass Bank account *9012, in the amount of \$20,596, made payable to Livingston Pools. In the memo line of this document Daugherty wrote, “*Mentone.*”

135. On November 11, 2017, Lisa Daugherty wrote check # 1152, from Compass Bank account *9012, in the amount of \$456.84, made payable to Atkins Furniture. In the memo line of this document Daugherty wrote, “*Mentone/Full*

Mattress.”

136. On December 11, 2017, Lisa Daugherty wrote check # 1303, from Regions Bank account *7689, in the amount of \$20,596, made payable to Clark Livingston Pools. In the memo line of this document Daugherty wrote, “*Mentone Pool.*”

137. On January 13, 2018, Lisa Daugherty wrote check #1123, from Regions Bank account *7689, in the amount of \$205, made payable to LockDoc. In the memo line of this document Daugherty wrote, “*Rekey Mentone.*”

138. On January 24, 2018, Lisa Daugherty wrote check # 1158, from Compass Bank account *9012, in the amount of \$944, made payable to Chimney Pro. In the memo line of this document Daugherty wrote, “*Repair Mentone.*”

139. On March 12, 2018, Lisa Daugherty wrote check # 1160, from Compass Bank account *9012, in the amount of \$8,850, made payable to Livingston Pools. In the memo line of this document Daugherty wrote, “*Mentone paid in full / dirt /pavement around pool.*”

140. On March 19, 2018, Lisa Daugherty wrote check # 1168, from Compass Bank account *9012, in the amount of \$2,500, made payable to Bryant’s. In the memo line of this document Daugherty wrote, “*Mentone H/C new unit upstairs balance \$3500.00.*”

141. On August 3, 2018, Lisa Daugherty wrote check # 905168, from Compass Bank account *9012, in the amount of \$1,500. In the memo line of this document Daugherty wrote, “*pool maintenance 1 year.*”

142. On December 10, 2018, Lisa Daugherty wrote check # 1251, from Compass Bank account *9012, in the amount of \$5,612. In the memo line of this document Daugherty wrote, “*mentone pool cover / Installation.*”

Civil Forfeiture

143. The Defendant Assets constitute or are derived from proceeds traceable to violations of or conspiracy to violate 18 U.S.C. § 1343 (wire fraud) and violations of or conspiracy to violate 18 U.S.C. § 1957 (engaging in monetary transactions in property derived from specified unlawful activity), and are thus subject to forfeiture per 18 U.S.C. § 981(a)(1)(C).

144. The names and addresses of possible claimants known to the United States are as follows:

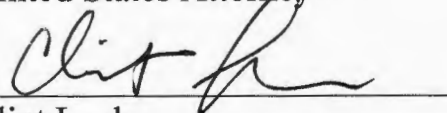
Lisa Daugherty 525 Guy Lee Lake Road, Rainbow City, AL 35906	Lisa Daugherty 2162 West Beach Blvd., Gulf Shores, AL 36542
Lisa Daugherty 20077 Scenic Highway Mentone, AL 35984	Lisa Daugherty c/o Kevin Butler, Esq. Federal Defender, Northern District of Alabama 505 20th Street North Suite 1425 Birmingham, AL 35203

Linda Steinberg c/o Rusty Weaver, Esq. Weaver Tidmore LLC 100 Olde Towne Road Suite 105 Vestavia Hills, Alabama 35216	
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WHEREFORE, the Plaintiff requests that due notice issue to enforce the forfeiture and to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed; that the named Defendant Assets be condemned and forfeited to the United States of America for disposition according to law; and for such other and further relief as this Court may deem just and proper.

JAY E. TOWN

United States Attorney



Clint Locke

Thomas Borton

Assistant United States Attorneys

1801 Fourth Avenue North

Birmingham, AL 35203

(205) 244-2001

Clint.Locke@usdoj.gov

Thomas.Borton@usdoj.gov

VERIFICATION

I, David Stewart, am a Senior Special Agent of the United States Secret Service, and the agent assigned responsibility for this case. I have read the contents of the foregoing Complaint for Forfeiture *In Rem* describing the Defendant Assets. The statements contained therein are true to the best of my knowledge and belief. I base my knowledge for this verification of the Complaint for Forfeiture *In Rem* on the following:

- a. Information provided to me by other law enforcement officers who have participated in the investigation of individuals described in this Complaint;
- b. My participation in the investigation of Lisa Daughtery and the Defendant Assets; and
- c. My experience in investigations involving financial crimes such as money laundering and wire fraud.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed 23rd October 2019.



David Stewart
Senior Special Agent
United States Secret Service