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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 22-0059 HSG
)	
Plaintiff,)	APPLICATION OF THE UNITED STATES FOR
)	A PRELIMINARY ORDER OF FORFEITURE
v.)	
)	
SHELBEЕ SZETO,)	
)	
Defendant.)	

The United States of America, by and through the undersigned Assistant United States Attorney, respectfully submits this Application for a Preliminary Order of Forfeiture. The property subject to the proposed Preliminary Order of Forfeiture is property seized in the investigation, as follows (hereinafter “the subject property”):

1. Approximately \$25,403.06 from the First Republic Bank account 80009721020 held in the name Shelbee Szeto
2. 2020 Tesla sedan with California license plate ZWYU, VIN: 5YJ3E1EC4LF746836
3. 2021 Porsche sport utility vehicle with California license plate 33873HS, VIN: WP1AG2A5XMLB50111
4. 1 Louis Vuitton teddy bear

- 1 5. 1 Chanel black plastic purse
- 2 6. 1 Louis Vuitton black leather handbag and attached wallet
- 3 7. 1 Dior small black saddle bag
- 4 8. 1 Dior pink mini lady bag
- 5 9. 1 Dior rose micro lady bag
- 6 10. 1 Dior blue micro lady bag
- 7 11. 1 Gucci beige Soho small leather disco bag
- 8 12. 1 Chanel black medium classic flap bag
- 9 13. 1 Chanel black medium Diana bag
- 10 14. 1 Chanel black Coco handle bag
- 11 15. 1 yellow/lime Hermes Kelly bag
- 12 16. 1 black Hermes Kelly bag
- 13 17. 1 pink Hermes Kelly bag
- 14 18. 1 baby blue Hermes Kelly bag
- 15 19. 1 teal Chanel classic medium bag
- 16 20. 1 blue Chanel classic medium bag
- 17 21. 1 light blue Chanel classic medium bag
- 18 22. 1 lime Chanel classic medium bag
- 19 23. 1 red Chanel classic medium bag
- 20 24. 1 lavender Chanel classic medium bag
- 21 25. 1 gray Chanel classic medium bag
- 22 26. 1 pink Chanel classic medium bag
- 23 27. 1 light pink Chanel classic medium bag
- 24 28. 1 white Chanel classic medium bag
- 25 29. 1 yellow/lime Chanel classic medium bag
- 26 30. 1 black Chanel classic medium bag
- 27 31. 1 silver Chanel classic small bag
- 28 32. 1 pink Chanel classic small bag

- 1 33. 1 gold Chanel classic small bag
- 2 34. 1 iridescent pink Chanel classic small bag
- 3 35. 1 black Chanel classic small bag
- 4 36. 1 pearl Chanel classic large bag
- 5 37. 1 tan Chanel classic large bag
- 6 38. 1 black Chanel classic large bag
- 7 39. 1 pink Chanel classic bag
- 8 40. 1 beige Chanel classic large bag
- 9 41. 1 light green Chanel classic large bag
- 10 42. 1 teal Chanel classic large bag
- 11 43. 1 white small Hermes Birkin bag
- 12 44. 1 red small Hermes Birkin bag
- 13 45. 1 teal small Hermes Birkin bag
- 14 46. 1 pink small Hermes Birkin bag
- 15 47. 1 light blue large Hermes Birkin bag
- 16 48. 1 black large Hermes Birkin bag
- 17 49. 1 teal crocodile Hermes Birkin bag
- 18 50. 1 green Hermes Birkin bag
- 19 51. 1 pink Hermes Birkin bag
- 20 52. 1 beige Hermes Birkin bag
- 21 53. 1 pink Hermes Birkin bag
- 22 54. 1 black Hermes Birkin bag
- 23 55. 1 Louis Vuitton backpack-type purse
- 24 56. 1 Bulgari Serpenti Forever charm wallet
- 25 57. 5 Hermes bag charms
- 26 58. 1 pink pearl Chanel purse
- 27 59. 1 silver Chanel purse
- 28 60. 1 red-orange Chanel pursue

- 1 61. 1 black Chanel purse
- 2 62. 1 rainbow Chanel purse
- 3 63. 1 white Chanel small purse
- 4 64. 1 purple Chanel purse
- 5 65. 1 black Chanel purse with black chain strap
- 6 66. 1 black leather and pearl Chanel purse with black leather and chain straps
- 7 67. 1 white pearl Chanel purse with black interior
- 8 68. 1 gray-black sequin Chanel purse
- 9 69. 2 black pearl Chanel purses
- 10 70. 1 Chanel tweed flap bag
- 11 71. 1 Louis Vuitton tote bag with wallet
- 12 72. 1 green crocodile Hermes Birkin bag with pink horse charm
- 13 73. 1 black leather Hermes Birkin bag
- 14 74. 1 silver Chanel clutch purse
- 15 75. 1 purple leather Chanel purse
- 16 76. 1 beige Chanel purse
- 17 77. 1 silver Chanel purse
- 18 78. 1 rainbow Chanel purse
- 19 79. 1 green crocodile mini Hermes Birkin bag
- 20 80. 1 brown leather mini Hermes Birkin bag
- 21 81. 1 black leather with smile mini Hermes Birkin bag
- 22 82. 2 Dior crocodile small purses – 1 pink, 1 white
- 23 83. 1 black and white Hermes snake purse
- 24 84. 4 assorted Louis Vuitton purses/handbags
- 25 85. 1 Prada black sequin purse
- 26 86. 1 Burberry purse
- 27 87. 1 Louis Vuitton beige fanny pack
- 28 88. 1 Louis Vuitton iridescent plastic purse

89. 2 coach handbags, 1 green, 1 beige
90. 5 assorted Louis Vuitton purses/handbags
91. 1 black and red Louis Vuitton backpack purse
92. 1 Chole beige purse
93. 3 Yves Saint Laurent purses – 1 crocodile, 1 white, 1 black
94. 1 baby blue Bulgari Serpenti purse
95. 1 Louis Vuitton bum bag purse
96. 1 Rolex men's watch and box – serial number 6671M645
97. 1 Rolex men's watch and box – serial number 135Y2830
98. 1 Rolex men's watch and box – serial number 5P2U9359
99. 1 Rolex men's watch and box – serial number 1U4132V9
100. 1 Audemar Piguet men's watch and box – serial number XG7569R
101. 6 silver necklaces with pendants
102. 6 gold necklaces with pendants
103. 3 silver bracelets
104. 6 gold bracelets
105. 1 silver panther ring
106. 1 silver flower ring
107. 1 silver Cartier bracelet
108. 1 rose gold Cartier bracelet
109. 1 gold Cartier bracelet
110. 1 Christian Dior necklace
111. 1 rose gold necklace
112. 1 silver necklace
113. 1 diamond necklace
114. 2 gold necklaces
115. 26 pairs of earrings
116. 2 silver lock pendant

117. 2 gold lock pendant
118. 2 single earrings
119. 8 gold rings
120. 12 silver rings
121. 1 pair of butterfly earrings
122. 1 Chanel stud earring
123. 1 gold necklace
124. 1 pearl necklace
125. 1 Patek Philippe watch – serial number 7265109
126. 1 Rolex watch – serial number 923J1547
127. 1 Patek Phillipe watch – serial number A381ACP
128. 1 Rolex watch – serial number S4Y32171
129. 1 Rolex watch – serial number 6P4R9587
130. 1 Rolex watch – serial number H62020L4
131. 1 Audemars Piguet watch – serial number CJ4604G
132. 1 Bulgari watch – serial number SP35GL0201
133. 1 Audemars Piguet watch – serial number K35986
134. 1 Audemars Piguet watch – serial number HT8618J
135. 1 Louis Vuitton black cord bracelet
136. 2 Cartier silver bracelets
137. 1 pair of Bulgari gold and green stud earrings
138. 1 pair of silver stud earrings, no known brand
139. 1 Cartier rose gold and diamond ring
140. 1 pair of diamond stud earrings, with one cross, no known brand
141. 1 Cartier Panthere ring with emerald eyes
142. 1 Shreve & Co. silver chain necklace
143. 1 gold pendant cross necklace
144. 1 silver “paper clip” necklace

145. 1 Pandora charm bracelet
146. 1 strand of 8 Mikimoto pearls
147. 1 gold necklace with pendant
148. 1 Cartier cheetah pendant necklace
149. 1 Tiffany & co. ball and lock necklace
150. 1 Cartier cheetah pendant necklace with tassel
151. 1 Louis Vuitton pendant/pin necklace
152. 1 Cartier bolo necklace
153. 1 Chanel gold necklace
154. 1 Chanel silver necklace
155. 1 Bulgari diamond necklace
156. 1 gold necklace
157. 7 necklaces with clover-shaped design
158. 2 bracelets with clover-shaped design
159. 1 Louis Vuitton bracelet
160. 1 Chanel WG, diamonds camelia long transformable necklace
161. 1 Louis Vuitton YG, WG, RG, diamonds brooch.

Factual Background

On February 11, 2022, defendant Shelbee Szeto was charged by an Information with violations of Title 18, United States Code, Section 1343 (Wire Fraud); Title 18, United States Code, Section 1957 (Money Laundering); and Title 26, United States Code, Section 7206(1) (Filing a False Tax Return). The Information sought criminal forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) of the following property, including but not limited to:

1. Approximately \$25,403.06 from the First Republic Bank account 80009721020 held in the name Shelbee Szeto
2. 2020 Tesla sedan with California license plate ZWYU, VIN: 5YJ3E1EC4LF746836
3. 2021 Porsche sport utility vehicle with California license plate 33873HS, VIN: WP1AG2A5XMLB50111

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153. 1 Chanel gold necklace
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155. 1 Bulgari diamond necklace
156. 1 gold necklace
157. 7 necklaces with clover-shaped design
158. 2 bracelets with clover-shaped design
159. 1 Louis Vuitton bracelet
160. 1 Chanel WG, diamonds camelia long transformable necklace
161. 1 Louis Vuitton YG, WG, RG, diamonds brooch.

Dkt. No. 1.

On March 23, 2022, defendant Shelbee Szeto pled guilty pursuant to a plea agreement to Counts One through Five of the Information, namely, Wire Fraud in violation of Title 18, United States Code, Section 1343; Money Laundering in violation of Title 18, United States Code, Section 1957; and Filing a False Tax Return in violation of Title 26, United States Code, Section 7206(1). Dkt. No. 13.

The defendant further admitted that the subject property was proceeds from the wire fraud scheme and was involved in the offenses outlined in Counts One and Two of the Indictment, and thus is forfeitable to the United States pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C); Title 28, United States code, Section 2461(c); and the procedures outlined in Rule 32.2 of the Federal Rules and Criminal Procedure. *Id.* at ¶ 11.

1 The accompany proposed Preliminary Order of Forfeiture is requested to complete the forfeiture
2 process.

3 **Basis for a Preliminary Order of Forfeiture**

4 Rule 32.2 of the Federal Rules of Criminal Procedure addresses criminal forfeiture procedure.
5 Rule 32.2(b)(1)(A) provides that as soon as practicable after entering a guilty verdict or accepting a plea
6 of guilty or nolo contendere on any count in an indictment or information with regard to which criminal
7 forfeiture is sought, the court shall determine what property is subject to forfeiture under the applicable
8 statute. If forfeiture of specific property is sought, the court shall determine whether the government has
9 established the requisite nexus between the property and the offense. If the government seeks a personal
10 money judgment against the defendant, the court shall determine the amount of money that the
11 defendant will be ordered to pay.

12 Rule 32.2(b)(1)(B) provides that the court's determination may be based on evidence already in
13 the record, "including any written plea agreement[.]" If the forfeiture is not agreed to but rather
14 contested, the court may determine the nexus of the specific property to the offense based on evidence or
15 information before the Court or presented by the parties at a hearing after the verdict or finding of guilt.

16 Rule 32.2(b)(2) states that if the court finds that property is subject to forfeiture, it shall enter a
17 preliminary order of forfeiture setting forth the amount of any money judgment or directing the
18 forfeiture of the specific property without regard to any third party's interest in all or part of it. As to the
19 interest of third parties, the rule provides that, "Determining whether a third party has such an interest
20 must be deferred until any third-party files a claim in the subsequent ancillary proceeding under Rule
21 32.2(c)." The ancillary proceeding can be completed once the preliminary order of forfeiture becomes
22 final as to the defendant, upon the court announcing such at sentencing and including it in the judgment,
23 per Rule 32.2(b)(4).

24 Rule 32.2(b)(3) provides that the entry of a preliminary order of forfeiture authorizes the
25 Attorney General (or a designee) to seize the specific property subject to forfeiture; to conduct any
26 discovery the court considers proper in identifying, locating, or disposing of the property; and to
27 commence proceedings that comply with any statute governing third-party rights. The court may include
28

1 in the order of forfeiture any conditions reasonably necessary to preserve the property's value pending
2 any appeal.

3 Rule 32.2(b)(4) further provides that at sentencing, or at any time before sentencing if the
4 defendant consents, the order of forfeiture becomes final as to the defendant and shall be made part of
5 the sentence and must be included in the judgment.

6 The United States has established the sufficient requisite nexus between the subject property and
7 the offense. The defendant pled guilty on March 23, 22, to Counts One, Two, Three, Four and Five of
8 the Information. Dkt. 13. Accordingly, the subject property is “involved in” the violation of charges in
9 Counts One, Two, Three, Four and Five is subject, as alleged in the Information to forfeiture to the
10 United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States
11 Code, Section 2461(c).

12 **Procedure Following Issuance of Preliminary Order of Forfeiture**

13 Upon the issuance of a Preliminary Order of Forfeiture and pursuant to Title 21, United States
14 Code, Section 853(n), and Rule G(4)(a)(iv) of the Supplemental Rules for admiralty or Maritime Claims
15 and Asset Forfeiture Actions, the United States will publish on www.forfeiture.gov, a government
16 website for at least thirty days, notice of this Order, notice of its intent to dispose of the property in such
17 manner as the Attorney General may direct, and notice that any person, other than the defendant, having
18 or claiming a legal interest in the property must file a petition with the Court and serve a copy on Chris
19 Kaltsas, Assistant United States Attorney, 450 Golden Gate Avenue, Box 36055, San Francisco, CA
20 94102, within thirty (30) days of the final publication of notice or of receipt of actual notice, whichever
21 is earlier. This notice shall state that the petition shall be for a hearing to adjudicate the validity of the
22 petitioner's alleged interest in the property, shall be signed by the petitioner under penalty of perjury,
23 shall set forth the nature and extent of the petitioner's right, title or interest in the forfeited property, and
24 any additional facts supporting the petitioner's claim and the relief sought. The United States may also,
25 to the extent practicable, provide direct written notice to any person known to have alleged an interest in
26 the property that is the subject of the Preliminary Order of Forfeiture, as a substitute for published notice
27 as to those persons so notified.
28

Request for Preliminary Order of Forfeiture

The United States therefore moves this Court to enter the accompanying proposed Preliminary Order of Forfeiture which provides for the following:

- a. authorizes the forfeiture of the subject property to the United States;
- b. directs the United States, through its appropriate agency, to seize the forfeited property forthwith;
- c. authorizes the government to conduct discovery in order to identify, locate, or dispose of property subject to forfeiture in accordance with Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure;
- d. directs the United States to publish on a government website for at least thirty days, notice of this Order, notice of the government's intent to dispose of the property in such manner as the Attorney General may direct and provide notice that any person, other than the defendant, having or claiming a legal interest in the subject property must file a petition with the Court and serve a copy on government counsel within thirty (30) days of the final publication of notice or of receipt of actual notice, whichever is earlier; and
- e. the Court retains jurisdiction to enforce the Preliminary Order of Forfeiture, and to amend it as necessary, pursuant to Federal Rule of Criminal Procedure 32.2(e).

DATED: May 23, 2022

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

/s/
CHRIS KALTSAS
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that she caused a copy of the following documents:

- **APPLICATION FOR A PRELIMINARY ORDER OF FORFEITURE;**
- **[PROPOSED] PRELIMINARY ORDER OF FORFEITURE**

to be served this date by CM/ECF Electronic Case Filing Notification upon the person below at the place and address which is the last known address:

Edward Murray Robinson Law Office of Edward M. Robinson Del Amo Financial Center 21515 Hawthorne Blvd., Suite 665 Torrance, CA 90503 eroblaw@gmail.com Attorney for Shelbee Szeto	Rachael A. Robinson Law Office of Edward M. Robinson, A Prof Law Corp. 21515 Hawthorne Blvd., Suite 730 Torrance, CA 90503 rarobinson1019@gmail.com Attorney for Shelbee Szeto
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 23rd day of May 2022, at San Francisco, California.

/s/
KRYSTEL GARCIA
Asset Forfeiture Paralegal