

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No. 21-cr-00034-WJM

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. MICHAEL SHAWN STEWART,
2. BRYANT EDWIN SEWALL,

Defendants.

NOTICE OF PRELIMINARY ORDERS OF FORFEITURE

NOTICE IS HEREBY GIVEN that on November 22, 2024, in the above-captioned case, the United States District Court for the District of Colorado entered Preliminary Orders of Forfeiture as to defendants Michael Shawn Stewart and Bryant Edwin Sewall forfeiting the defendants interest in the following property to the United States pursuant to 18 U.S.C. § 982(a)(2):

1. All funds held in account number 1007557881 at Global Fidelity Bank Ltd., held in the name of Blue Isle Markets Inc;
2. All funds held in account number 1007557882 at Global Fidelity Bank Ltd., held in the name of Blue Isle Markets Inc;
3. Approximately \$11,183,135.00, plus accrued interest, from Equiti Capital UK Limited
4. Approximately \$853,941.00, plus accrued interest, from Advanced Markets (UK) Ltd account x1818;
5. Approximately \$50,000.00, plus accrued interest, from Advanced Markets (UK) Ltd account x1822;
6. Approximately \$15.00, plus accrued interest, from Island Technologies, LLC Banco Popular Account 030-109329
7. Approximately \$61,565.00, plus accrued interest, from Island Technologies, LLC Banco Popular Account 030-109027;
8. Approximately \$500.00, plus accrued interest, from Island Technologies, LLC Banco Popular Account 030-140862;
9. Approximately \$500.00, plus accrued interest, from Island Technologies, LLC Banco Popular Account 030-140846;

10. Approximately \$1,359,337.00, plus accrued interest, from Keystone Business Trust BBVA Compass Bank Account 6758633827;
11. Approximately \$10,240.00, plus accrued interest, from Keystone Business Trust BBVA Compass Bank Account 6756623921;
12. 2018 Chevrolet Silverado with VIN 3GCUKREC5JG299730;
13. Approximately \$30,051.00, plus accrued interest, from Banco Popular Account 274-061784;
14. Approximately \$451.00, plus accrued interest, Wells Fargo Account 5235-9286;
15. Approximately \$1,717.00, plus accrued interest, from USAA Federal Savings Bank Account 0236238132;
16. Approximately \$3,905.00, plus accrued interest, from MidFirst Bank Account 2011028270;
17. Approximately \$500.00, plus accrued interest, from Victoria Stewart Wells Fargo Account 17409200;
18. Funds from the sale of 2008 Yellow Fin Yacht, plus accrued interest;
19. Funds from the sale of 319 Dorado Beach East, Dorado, Puerto Rico, plus accrued interest;
20. Real Property located at 8082 E Arroyo Hondo Rd, Scottsdale, AZ 85266;
21. Proceeds from the sale of the real property located at Mira Mar Villas, #15 Garden Drive, Paradise Island, Bahamas, plus accrued interest;
22. Approximately \$160,122.00 from the sale of 7349 E Casitas Del Rio Dr, Scottsdale, AZ, plus accrued interest;
23. Funds totaling approximately \$118,755.00 from the sale of 8221 Sheridan St, Scottsdale, AZ, plus accrued interest;
24. Approximately \$24,730.00, plus accrued interest from Wells Fargo Bank NA Clearing, held in the name of A.L.A. Trust;
25. Approximately \$100,000.00, plus accrued interest, from Kaplan Hecker & Fink LLP;
26. Approximately \$112,188.00, plus accrued interest, from Banco Popular Account #274068741;
27. Approximately \$1,502.00, plus accrued interest, from USAA Federal Savings account 184645212;
28. Approximately \$452.00, plus accrued interest, from Navy Federal Credit Union account ending in 7165;
29. Approximately \$181.00, plus accrued interest, from Service Credit Union account 28514106-9;
30. Approximately \$815.00, plus accrued interest, from Wells Fargo account 5656128823;
31. Approximately \$9,266.62, plus accrued interest, from sale of 2012 Jeep Wrangler;
32. Approximately \$3,994,917.00, plus accrued interest, from sale of 1201 Lloyds Rd, Little Elm, TX;
33. Approximately \$277,064.00, plus accrued interest, from sale of 1197 Lloyds Rd, Little Elm, TX;
34. Approximately \$414,963.43, plus accrued interest, from the sale of the real

- property located at Unit Number 704 Ocean Place Condominiums, Paradise Island, The Bahamas;
35. Real property located in Ukraine at Odessa Oblast, Ovidiopol Region, Lymanka, Zhemchuzhna Street, r/a "Druzhnyi", Building 1-A, Apartment 224;
 36. Real property located in Ukraine at Kyiv, Velyka Vasylkivska Street, Building 40, Apartment 11;
 37. Approximately \$75,000.00, plus accrued interest, from sale of 2014 SeaVee Motor Vessel Currenseas;
 38. Approximately \$262,773.00, plus accrued interest, from Banco Popular Account 274-049843;
 39. Approximately \$5,663.00, plus accrued interest, from Bank Popular account 030-115590 West Beach;
 40. Approximately \$1,429,942.00, plus accrued interest, from UBS Financial Services Inc Account DK account #47422;
 41. Real Property located at 5406 South Cottonwood Court, Greenwood Village, CO 80121;
 42. Funds from the sale of 330 Dorado Beach East, Dorado, Puerto Rico, plus accrued interest;
 43. 2019 Honda Odyssey Passenger Van with VIN 5FNRL6H86KB037764;
 44. Approximately \$25,935.00, plus accrued interest, from KeyBank Account 760143007226;
 45. Approximately \$311,096.00, plus accrued interest, in funds from UBS Financial Services Inc Account DK 47885 94;
 46. Approximately \$5,335.00, plus accrued interest, from KeyBank Account 760452066425;
 47. 2016 Audi A8 Sedan VIN WAU43AFD0GN021899;
 48. All funds held in CollegeAmerica 529 account DK 48076 94, plus accrued interest;
 49. All funds held in CollegeAmerica 529 account DK 48077 94, plus accrued interest;
 50. All funds held in CollegeAmerica 529 account DK 48078 94, plus accrued interest;
 51. All funds held in CollegeAmerica 529 account DK 48079 94, plus accrued interest;
 52. All funds held in CollegeAmerica 529 account DK 48080 94, plus accrued interest;
 53. Real Property located at 12088 Tetzal Ave, Port Charlotte, Florida 33981; and
 54. Approximately \$147,750.00 in Charitable returns.

YOU ARE HEREBY NOTIFIED that the United States intends to dispose of this property as provided by law.

Pursuant to 21 U.S.C. § 853(n), any person claiming a legal right, title, or interest in any of the property described above must petition the United States District Court for the District of

Colorado, 901 19th Street, Denver, Colorado 80294, for a hearing to adjudicate the validity of the alleged legal interest in this property. The petition must be filed within thirty (30) days of the receipt of this notice or thirty (30) days of the last publication of this notice, whichever is earlier. If a hearing is requested, it shall be held before the Court alone, without a jury.

The petition must be signed by the petitioner under penalty of perjury, and shall set forth the nature and extent of the petitioner's right, title, or interest in each of the forfeited properties and the time and circumstances of the petitioner's acquisition of the right, title or interest in each property and any additional facts supporting the petitioner's claim and the relief sought. 21 U.S.C. § 853(n)(3).

A copy of the petition should be served on Assistant United States Attorney Tonya S. Andrews, United States Attorney's Office, 1801 California Street, Suite 1600, Denver, Colorado 80202.

Pursuant to 21 U.S.C. § 853(n)(2), NEITHER A DEFENDANT IN THE ABOVE-STYLED CASE NOR HIS/HER AGENT IS ENTITLED TO FILE A PETITION.

ANY HEARING on your petition shall, to the extent practicable and consistent with the interests of justice, be held within thirty (30) days of the filing of your petition. The Court may consolidate your hearing on the petition with any other hearings requested on any other petitions filed by any other person other than the defendant named above.

YOU HAVE THE RIGHT at the hearing to testify and present evidence and witnesses on your own behalf and cross-examine witnesses who appear at the hearing. The United States may present evidence and witnesses in rebuttal and in defense of its claim to the property and cross-examine witnesses who appear at the hearing. In addition to testimony and evidence presented at the hearing, the Court shall consider the relevant portions of the record of the criminal cases which resulted in the Preliminary Order of Forfeiture.

If, after the hearing, the Court determines that the petitioner has established by a preponderance of the evidence that: (a) the petitioner has a legal right, title or interest in the property, and such right, title or interest renders the Preliminary Order of Forfeiture invalid in whole or in part because the right, title, or interest was vested in the petitioner rather than the defendant or was superior to any right, title, or interest of the defendant at the time of the commission of the acts which gave rise to the forfeiture of the property; or (b) the petitioner is a bona fide purchaser for value of the right, title, or interest in the property and was at the time of purchase reasonably without cause to believe that the property was subject to forfeiture; the Court shall amend the Preliminary Order of Forfeiture in accordance with its determination. 21 U.S.C. § 853(n)(6).

IF YOU FAIL TO FILE A PETITION TO ASSERT YOUR RIGHT, TITLE, OR INTEREST IN THE ABOVE-DESCRIBED PROPERTY WITHIN THIRTY (30) DAYS OF THIS NOTICE, YOUR RIGHT, TITLE, AND INTEREST IN THIS PROPERTY SHALL BE LOST AND THE PROPERTY FORFEITED TO THE UNITED STATES OF AMERICA.

DATED this 11th day of December 2024.

Respectfully submitted,

MATTHEW T. KIRSCH
Acting United States Attorney

s/ Tonya S. Andrews
Tonya S. Andrews
Assistant United States Attorney
United States Attorney's Office
1801 California Street, Suite 1600
Denver, Colorado 80202
Telephone: 303-454-0100
Fax: 303-454-0405
Email: tonya.andrews@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of December 2024 I electronically filed the foregoing with the Clerk of Court using the ECF system which will give notice to all attorneys of record, and mailed the same via regular and certified mail to the following:

Victoria Stewart
8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7260

Victoria Stewart
32531 N Scottsdale Road #105-155
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7253

Michael Stephen Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 7246

FREDRIC M. WINOCUR
303 16th Street, Ste. 200
Denver, Colorado 80202
Counsel for Michael Young
Cert # 7021 0350 0002 0599 7239

Maria Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 7222

Tracy L. Ashmore
Robinson Waters & O'Dorisio, P.C.
1099 18th Street Granite Tower Suite 2600
Denver, CO 80202-1937
Counsel for Maria C. Young;
West Beach, LLC;
Salve Regina Trust;
Hase Haus, LLC; and
Casa Conejo, LLC;
Cert # 7021 0350 0002 0599 7215

Hannah Ohonkova Sewall
1201 Lloyds Road
Little Elm, TX 75068
Cert # 7021 0350 0002 0599 7208

Keystone Business Trust
c/o Michael S. Stewart

8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7192

Keystone Business Trust
c/o Victoria Stewart
8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7185

1989 Foundation
c/o Douglas Fathers
The Balmoral Corporate Ctr Unit E, 3rd Floor
Sanford Drive, Nassau, Bahamas
Cert # 7021 0350 0002 0599 7178

1989 Foundation
c/o Michael S. Stewart
8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7161

Britton C. Nohe-Braun
Dentons US LLP
1400 Wewatta Street, Suite 700
Denver, CO 80202
Counsel for Equiti Capital UK Ltd
Cert # 7021 0350 0002 0599 7154

Blue Isle Markets, LLC
c/o Michael S. Stewart
8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7147

Blue Isle Markets, LLC
c/o Bryant Sewall
300 Lakefront Drive #6401
Little Elm, Texas 75068
Cert # 7021 0350 0002 0599 7130

Island Technologies, LLC
c/o Michael S. Stewart
8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7123

Island Technologies, LLC
c/o Michael Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 7116

Island Technologies, LLC
c/o Bryant Sewall
300 Lakefront Drive #6401
Little Elm, Texas 75068
Cert # 7021 0350 0002 0599 7109

Sandy Toes, LLC
c/o Michael S. Stewart
8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7093

Constancia LLC
c/o Bryant Sewall
300 Lakefront Drive #6401
Little Elm, Texas 75068
Cert # 7021 0350 0002 0599 7086

Wind River Jiroch, LLC
c/o James Roach
8930 E Raintree Dr Ste 100
Scottsdale, AZ 85260
Cert # 7021 0350 0002 0599 7079

Wind River Jiroch, LLC
ATTN: Scott W. Meier, P.C.
200 E 8th Ave Ste 203
PO Box 845
Cheyenne, WY 82001
Cert # 7021 0350 0002 0599 7062

ALA Trust
c/o Shawn Stewart
43926 N Hudson Trl
New River, AZ 85087-6202
Cert # 7021 0350 0002 0599 7055

Jeffrey Mark Villanueva
Jeffrey M. Villanueva PC
700 Colorado Boulevard
Counsel for Shawn Stewart
Cert # 7021 0350 0002 0599 7048

ALA Trust
c/o James Roach
8930 E Raintree Dr Ste 100
Scottsdale, AZ 85260
Cert # 7021 0350 0002 0599 7031

Women's National Football Conference
c/o Bryant Sewall
300 Lakefront Drive #6401
Little Elm, Texas 75068
Cert # 7021 0350 0002 0599 7024

DCC Islands Foundation
c/o Bryant Sewall
300 Lakefront Drive #6401
Little Elm, Texas 75068
Cert # 7021 0350 0002 0599 7017

Weinzel, LLC
c/o Michael S. Stewart
32531 N Scottsdale Road #105-155
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 7000

Weinzel LLC
c/o Victoria Stewart
32531 N Scottsdale Road #105-155
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 6997

West Beach, LLC
c/o Michael Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 6980

West Beach, LLC
c/o Maria Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 6973

Island Bum, LLC
c/o Michael Stewart
8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 6966

Island Bum, LLC
c/o Bryant Sewall
300 Lakefront Drive #6401
Little Elm, Texas 75068
Cert # 7021 0350 0002 0599 6959

Hase Haus, LLC
c/o Michael Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 6942

Casa Conejo, LLC
c/o Michael Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 6935

Casa Conejo, LLC
c/o Maria Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 6478

Salve Regina Trust
c/o Michael Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 6485

Salve Regina Trust
c/o Maria Young
5406 S. Cottonwood Court
Greenwood Village, CO 80121
Cert # 7021 0350 0002 0599 6492

Vivian Rivera Drohan
Drohan Lee LLP
5 Penn Plaza 19th Floor
New York, NY 10001
*Counsel for Keystone Business Trust;
Weinzel, LLC; and
1989 Foundation;
Advanced Markets;*
Cert # 7021 0350 0002 0599 6508

DCC Island Foundation
Hannah Ohonkova Sewall
1201 Lloyds Road
Little Elm, TX 75068
Cert # 7021 0350 0002 0599 6515

1989 Foundation
Victoria Stewart
8082 East Arroyo Hondo Road
Scottsdale, AZ 85266
Cert # 7021 0350 0002 0599 6522

Fortitude Business Trust
c/o Bryant Sewall
300 Lakefront Drive #6401
Little Elm, Texas 75068
Cert # 7021 0350 0002 0599 6539

And Via FedEx to:

DCC Islands Foundation
c/o Douglas Fathers
The Balmoral Corporate Ctr
Unit E, 3rd Floor Sanford Drive Nassau, Bahamas

DCC Island Foundation
ATTN: Michael C Miller
#10 Lookout Hill
Winton Heights, Nassau, Bahamas

Island Technologies LLC
ATTN: Roberto A Corretjer
Caribe Office Building, Suite 802
53 Palmeras Street, SAN JUAN, PR, 00901

s/Sheri Gidan
FSA Federal Paralegal
United States Attorney's Office