

**ANTHONY L. VELASQUEZ, ESQ.**  
575 Rt. 70, 2<sup>nd</sup> Floor P.O. Box 1030  
Brick, New Jersey 08723  
(t) 732-903-1966; (f) 732-416-7861  
avelasquez@tryko.com  
Attorney for Public Tax Investments, LLC

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**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

v.

BOBBY BOYE, aka  
Bobby Ajiboye, aka Bobby Aji-Boye,  
Defendant.

:  
:  
: Case No. 15-196 (FLW)  
:  
: **PROOF OF SERVICE**  
:  
: Return date: June 5, 2017  
:  
:

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I, Anthony L. Velasquez, Esq., hereby certify and declare as follows:

1. I am an attorney-at-law admitted to practice before the Courts of the State of New Jersey, the U.S. District Court for the District of New Jersey, and the United States Court of Appeals for the Third Circuit. I am counsel for the Petitioner Public Tax Investments, LLC, and I have personal knowledge of the following facts to which I certify under penalty of perjury.

2. On May 2, 2017, I filed the Clerk, United States District Court, by U.S. Priority Mail, Clarkson S. Fisher Bldg. and U.S. Courthouse, 402 E. State Street, Trenton, NJ, 08608, the following: (a) Notice of Petition; (b) Certification of Anthony L. Velasquez, Esq.; (c) Memorandum of Law; (d) Proposed form of Order; and (e) this Proof of Service.

3. On this same date, I caused to be deposited via U.S. Priority Mail a copy of the above papers to the following:

Hon. Freda L. Wolfson, U.S.D.J. (courtesy copy as per judge preference)  
United States District Court – District of NJ  
Clarkson S. Fisher Bldg. and U.S. Courthouse  
402 E. State Street  
Trenton, NJ, 08608

and

U.S. Department of Justice  
United States Attorney – District of NJ  
Attention: Jafer Aftab, Esq., Assistant U.S. Attorney  
970 Broad Street, 7<sup>th</sup> Floor  
Newark, NJ 07102

I hereby certify and declare under penalty of perjury that the above-statements made by me are true. I am aware that if any such statements are willfully false, I am subject to punishment

/s/ Anthony L. Velasquez, Esq.  
Anthony L. Velasquez, Esq.

May 2, 2017

**ANTHONY L. VELASQUEZ, ESQUIRE**

575 Route 70, 2<sup>nd</sup> Floor  
P.O. Box 1030  
Brick, NJ 08723  
732-903-1966 PHONE  
732-416-7861 FAX  
AVelasquez@tryko.com

R E C E I V E D

MAY 04 2017

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH  
CLERK

**VIA U.S. PRIORITY MAIL**

Clerk, United States District Court – District of NJ  
Clarkson S. Fisher Bldg. and U.S. Courthouse  
402 E. State Street  
Trenton, NJ, 08608

May 2, 2017

**Re: United States v. Boye, Criminal No. 15-196**

Dear Clerk:

As per my telephone conversation with your office today, I am in-house corporate counsel for a third party tax lien company that holds tax sale certificates against real estate throughout NJ. The criminal defendant in this matter (Boye) owned property in NJ that was subject to forfeiture. The U.S. Attorney has now provided notice of this forfeiture (letter dated 4/26/2017 attached), and has said that any third party claiming an interest in the property must in accordance with 21 U.S.C. §853(n) file a “petition for a hearing to adjudicate the validity” of such property interest. My company was the winning bidder at a public auction held by the municipal tax collector 2 years ago and therefore holds the tax lien against this property and has paid the taxes on this property. My client therefore has a recorded tax lien against the defendant and all others who hold any property interests. Since the tax lien laws place my client in first position over any owners, mortgage holders, federal lien holders, or any others, my client asserts this limited right against the forfeiture, as set forth in my petition papers.

I attempted through ECF to file a Notice of Appearance on behalf of Public Tax Investments, LLC, but when I went to file the petition papers as an “Application/Petition” there is no option to add Public Tax Investments, LLC, as a party. Therefore, as per my conversation with your office, I am submitting the papers by mail – an original plus a second copy (with a third copy marked as “courtesy copy” for Judge Wolfson since the website notes Judge Wolfson’s preference for courtesy copies).

I hereby enclose the following: (a) Notice of Petition; (b) Certification of Corporate Counsel Anthony L. Velasquez, Esq., in Support of Petition; (c) Legal Brief; (d) Proposed form of Order; and (e) Proof of Service. It is my understanding that there is no fee for this petition for property interest subject to forfeiture. If this is incorrect, you had said you would contact my office. Thank you.

Respectfully submitted,

  
Anthony L. Velasquez, Esq.

/encls.

cc. Jafer Aftab, Assist. U.S. Attorney (US DOJ)/encls.



U.S. Department of Justice

United States Attorney  
District of New Jersey

970 Broad Street, 7<sup>th</sup> floor  
Newark, New Jersey 07102

973-645-2700

April 26, 2017

**Via Certified Mail**

Public Tax Investments, LLC  
P.O. Box 1030  
Brick, New Jersey 08723

Re: Notice of Third Party Claimant Procedure for Forfeited Property  
*United States v. Bobby Boye*, Criminal No. 15-196 (FLW)

To Whom It May Concern:

The United States District Court for the District of New Jersey has ordered that certain property be forfeited to the United States in connection with the above-captioned criminal case. The enclosed Corrected Consent Judgment of Forfeiture (Money Judgment) and Preliminary Order of Forfeiture as to Specific Property (Final as to the Defendant) describes the property subject to forfeiture and the procedure for filing a claim to any of the property in which you may have a legal right, title, or interest.

If you wish to assert a legal interest in the forfeited property, you must file a petition for a hearing to adjudicate the validity of your alleged interest **within 35 days of the date of this letter— that is, May 31, 2017.** The procedure for filing a petition is set forth more fully in 21 U.S.C. § 853(n), which provides the exclusive means by which a third party may lay claim to forfeited assets, and is described in the Notice of Forfeiture that is also enclosed with this letter.

Your failure to file a petition within the time period set forth above will entitle the United States to seek entry of a Final Order of Forfeiture as to the property, and any claim you might have to such property would thereafter be precluded.

Sincerely,

WILLIAM E. FITZPATRICK  
ACTING UNITED STATES ATTORNEY

  
By: JAFFER AFTAB  
Assistant United States Attorney





Enclosures:

- Notice of Forfeiture
- Corrected Consent Judgment of Forfeiture (Money Judgment) and Preliminary Order of Forfeiture as to Specific Property (Final as to the Defendant)

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Anthony L Velasquez Esq  
Po Box 1030  
BRICK NJ 08723-0090

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SHIP TO:  
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District Court Clerk  
402 E State St  
Clarkson S. Fisher Bldg And U.S. Courthouse  
TRENTON NJ 08608-1507



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