

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA
Plaintiff,

v.

ONE HUNDRED FORTY-NINE THOUSAND FOUR HUNDRED TWENTY-SIX AND 00/100 DOLLARS (\$149,426.00) IN U.S. CURRENCY; 2022 CHEVROLET CORVETTE (VIN# 1G1YB2D46N5113704); 2022 PORSCHE 911 (VIN#WP0CD2A95NS260111); 2021 MERCEDES-BENZ GLS MAYBACH (VIN#4JGFF8HB4MA326991); WHITE 2021 MERCEDES-BENZ AMG GT (VIN# W1K7X8JB8MA036940); GRAY 2021 MERCEDES-BENZ AMG GT (VIN# W1K7X8JB7MA039537); 2021 JEEP GRAND CHEROKEE (VIN# 1C4RJFN95MC749511); 2021 DURANGO (VIN# 1C4SDJH94MC692743); 2018 LAMBORGHINI AVENTADOR (VIN# ZHWUG4ZD6JLA07121); 2015 CAN-AM SPYDER (VIN# 2BXNABC42FV000293); GLOCK 19X FIREARM (SERIAL#BTDY617); GLOCK 45 9MM-CALIBER FIREARM (SERIAL# BPHW105); FN FIVE SEVEN FIREARM (SERIAL# 386380329) SMITH & WESSON M&P .40-CALIBER FIREARM (SERIAL# NCLB00); GLOCK .357 CALIBER FIREARM (SERIAL# BKMN536); GLOCK 30S .45-CALIBER FIREARM (SERIAL# BVNU633); ASSORTED JEWELRY DESCRIBED IN ADDENDUM A,

Defendants, in rem;

JEFFERY LAMAR WILLIAMS II; MARTINEZ ARNOLD; ALLY FINANCIAL, INC.; MERCEDES-BENZ FINANCIAL SERVICES USA LLC; RAFAELLO & COMPANY INC. d/b/a A+A DIAMONDS LTD.; TRUIST BANK INC f/k/a SUNTRUST BANK; YSL ENTERPRISES, INC.,

Alleged Owners / Interest Holders.

CIVIL ACTION FILE
NO.: 2022cv367165

Atlanta Police Dept. No.
221291090

**CONSENT ORDER RELEASING CERTAIN PROPERTY SUBJECT TO CLAIMANT
RAFAELLO & COMPANY INC.'S NOTICE OF CLAIM
PURSUANT TO O.C.G.A. § 9-16-12(c)(1)**

WHEREFORE, Claimant, Raffaello & Company Inc., d/b/a A+A Diamonds Ltd. (“Raffaello”), Plaintiff, the State of Georgia (the “State”), and Claimant Jeffery Lamar Williams II, individually and as CEO of YSL Enterprises, Inc. (“Williams”), consent and agree to an Order releasing certain property, the Court orders as follows:

WHEREAS, on July 25, 2022, the State filed a Complaint for Forfeiture pursuant to O.C.G.A. § 9-6-12 against certain personal property, including jewelry as listed in Addendum A to the State’s Complaint; and

WHEREAS, Claimant Raffaello filed a Verified Answer to the State’s Complaint for Forfeiture on August 15, 2022; and

WHEREAS, Claimant Williams filed a Verified Answer to the State’s Complaint for Forfeiture on August 25, 2022; and

WHEREAS, Raffaello asserts a claim of ownership to certain items listed in Addendum A to the State’s Complaint, specifically:

- i. Item 8: Rolex Datejust watch; ‘King Slime’ engraved on rear;
- ii. Item 15: Diamond cross pendant (approx. 17 grams);
- iii. Item 26: Necklace with circular and square green jewels (approx. 83 grams);
- iv. Item 27: Diamond double row tennis necklace; and
- v. Item 68 or 69: Two (2) diamond stud earrings (approx. 7 grams) and (approximately 4 grams); and
- vi. Item 70: Diamond ring with 13 diamonds on band (approximate total weight of ring: 18 grams).

WHEREAS, Williams, in his Answer to the State’s Complaint for Forfeiture, asserted a claim of ownership to items of jewelry numbered 3-70 on Addendum A to the State’s Complaint (See Williams Answer, ¶ 36); and

WHEREAS, Raffaello, Williams and the State agree to an Order releasing the property below to Raffaello’s counsel of record, Manubir S. Arora (“Arora”) to hold in trust:

- i. Item 8: Rolex Datejust watch; ‘King Slime’ engraved on rear;
- ii. Item 15: Diamond cross pendant (approx. 17 grams);
- iii. Item 26: “Necklace with circular and square green jewels (approx. 83 grams);
- iv. Item 27: Diamond double row tennis necklace;
- v. Item 68 or 69 to be determined after inspection by Raffaello: “Two (2) diamond stud earrings (approx. 7 grams) and (approximately 4 grams); and
- vi. Item 70: Diamond ring with 13 diamonds on band (approximate total weight of ring: 18 grams).

WHEREAS, the State hereby consents to the release and return of the property identified above in accordance with the terms contained herein;

WHEREAS, Raffaello, Williams, and the State are not aware of any other person or entity that has a claim or interest in the above-described property.

THIS COURT HEREBY ORDERS the release of the property identified above to Arora to act as a receiver of said property and to facilitate the agreement reached by Raffaello and Williams. This Consent Order will serve as a final judgment only as to the Defendant personal property specifically identified above.

SO ORDERED this 21st day of February 2025.



Honorable Paige Reese Whitaker
Superior Court of Fulton County

Service via e-filing system

Consent signatures on next page

CONSENTED TO:

/s/ Manubir S. Arora, Esq.

MANUBIR S. ARORA

Attorney for Claimant Raffaello & Company Inc., d/b/a A+A Diamonds, Ltd.

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/s/ Vivian Hudson Uchitel, Esq.

VIVIAN HUDSON UCHITEL

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/s/ Grant Rood, Esq.

GRANT ROOD

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Attorneys for the State, Civil Forfeiture Unit

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/s/ Brian Steel, Esq.

BRIAN STEEL

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