

STATE OF INDIANA) IN THE HAMILTON SUPERIOR COURT 1
)SS
COUNTY OF HAMILTON) CAUSE NO. 29D01-2601-PL

STATE OF INDIANA,)
)
 Plaintiff,)
)
 -vs-)
)
AMY J. LEMIEUX and RICHARD JOSEPH)
RIDENOUR as TRUSTEES OF THE CLUB WAG)
TRUST dated APRIL 10, 2025,)
MISTER MAN CAVE LLC, CLUB WAG)
INVESTMENTS LLC, MONON MOTORS LLC,)
FREEZE DRIED SNACK CO., AMY LEMIEUX)
f/k/a AMY ETTINGER,)
)
Defendants,)
)
and HAROLD AMBORSE,)
ROY ALLEN REYNOLDS, JR., JULIA HOUSTON,)
LARRY BARTZ, and ALLYSA MOORE,)
WRENCHWORKS WESTFIELD LLC and)
THE DREES COMPANY INC.)
as their interests may appear,)

COMPLAINT FOR FORFEITURE

JURISDICTION

Jurisdiction over the subject matter of this Complaint is conferred upon this Court by
Indiana Code §34-24-2 et seq.

PARTIES

The Plaintiff herein, State of Indiana, is the proper Plaintiff pursuant to the Indiana
Civil Remedies for Racketeering Activity statute cited above.

CLUB WAG TRUST dated April 10, 2025 (hereafter “Trust” or “the Trust”) is a
trust created by Brett and Amy Lemieux on April 10, 2025 in Indiana. Brett L. Lemieux
(“Lemieux”) was a resident of Westfield, Hamilton County, Indiana until his death on or

about July 16, 2025. Prior to his death, Lemieux possessed personal property and intangibles, held in Hamilton County, Indiana; he performed acts in furtherance of the criminal enterprise herein described, in Hamilton County, Indiana. Upon information and belief, Lemieux transferred all his known assets to the trust on April 10, 2025. Upon Lemieux's death, Richard Joseph Ridenour became co-trustee with Amy Lemieux.

MISTER MAN CAVE LLC is an Indiana limited liability company. According to records held by the Indiana Secretary of State's Office, Mister Man Cave LLC has a principal office address of 16855 Southpark Dr., Suite 500, Westfield, Indiana 46074.

CLUB WAG INVESTMENTS LLC is an Indiana limited liability company. According to records held by the Indiana Secretary of State's Office, Club Wag Investments LLC has a principal office address of 15702 Buxton Dr., Westfield, Indiana 46074.

MONON MOTORS LLC is an Indiana limited liability company. According to records held by the Indiana Secretary of State's Office, Monon Motors LLC has a principal office address of 16855 Southpark Dr., Westfield, Indiana 46074.

AMY LEMIEUX f/n/a AMY ETTINGER is a resident of Westfield, Indiana.

The following persons and entities are named herein solely as their interests may appear in property which the Plaintiff seeks to forfeit:

HAROLD AMBROSE is a resident of Westfield, Indiana. According to records held by the Indiana Bureau of Motor Vehicles, Harold Ambrose is the registered owner of a 2015 Carry-On Trailer seized from Monon Motors LLC. Business records seized from Monon Motors LLC indicate that Mr. Ambrose sold the trailer to Brett Lemieux or Monon Motors, LLC, but Monon Motors, LLC failed to register and/or transfer the title of the trailer.

ROY ALLEN REYNOLDS, JR. is a resident of Avon, Indiana. According to records held by the Indiana Bureau of Motor Vehicles, Roy Allen Reynolds, Jr. is the registered owner of a 2020 Can-AM off road vehicle seized from Monon Motors LLC. Business records seized from Monon Motors LLC indicate that Mr. Reynolds, Jr. sold the off-road vehicle to Brett Lemieux or Monon Motors, LLC, but Monon Motors, LLC failed to register and/or transfer the title of the off road vehicle.

JULIA A. HOUSTON and LARRY BARTZ are residents of Indianapolis, Indiana. According to records held by the Indiana Bureau of Motor Vehicles, Julia A. Houston and Larry Bartz are the registered owners of a 2008 Nissan 350Z seized from Monon Motors LLC. Business records seized from Monon Motors LLC indicate that Ms. Houston and Mr. Bartz sold the vehicle to Brett Lemieux or Monon Motors, LLC, but Monon Motors, LLC failed to register and/or transfer the title of the vehicle.

ALYSSA MOORE is a resident of Brownsburg, Indiana. According to records held by the Indiana Bureau of Motor Vehicles, Alyssa Moore is the registered owner of a 2013 Cadillac SRX seized from Monon Motors LLC. Business records seized from Monon Motors LLC indicate that Ms. Moore sold the vehicle to Brett Lemieux or Monon Motors, LLC, but Monon Motors, LLC failed to register and/or transfer the title of the vehicle.

WRENCHWORKS WESTFIELD LLC is an Indiana domestic limited liability company. According to records held by the Indiana Secretary of State's Office, Wrenchworks Westfield LLC has a principal office address of 6587 Reserve Drive, Indianapolis, Indiana 46074. Wrenchworks Westfield LLC is named herein so that it may assert its mechanic's liens on certain vehicles which Plaintiff seeks to forfeit.

THE DREES COMPANY INC. is a foreign for-profit corporation. According to records held by the Indiana Secretary of State's Office, The Drees Company Inc. has a principal office at 211 Grandview Dr., Fort Mitchell, Kentucky, 41017. The Drees Company Inc. is listed herein as it is the owner of real estate commonly known as 217 E. Hoover Street in Westfield, Indiana which Plaintiff seeks to forfeit.

FACTUAL ALLEGATIONS

1. On February 7, 2025, the Westfield Police Department received an email alleging fraud arising from a business operating in Westfield, Indiana.
2. The complainant reported she purchased four sports memorabilia items online between September 2024 and December 2024. Specifically, she purchased baseballs purportedly autographed by Major League Baseball player Aaron Judge. These items were purchased from a Westfield-based business known as Mister Man Cave, located at 16855 Southpark Drive, Suite 500, Westfield, Indiana. Two baseballs were purchased through Mister Man Cave's Amazon.com storefront, while the remaining two were purchased directly from Mister Man Cave. The baseballs were represented as authentic and certified by reputable third-party authentication companies, including Fanatics and James Spence Authentication ("JSA"). These authentication companies assign unique identification numbers to each item to establish authenticity and provide proof of certification.
3. After purchasing the last baseball on December 24, 2024, the complainant discovered discrepancies regarding the authenticity of the items. Specifically:

- a. Three of the four baseballs bore authentication numbers that did not correspond to records maintained by Fanatics or JSA.
 - b. Two baseballs purchased on October 20, 2024, contained JSA authentication numbers that JSA confirmed were assigned to “Aaron Judge signed MLB Debut Tickets,” not baseballs.
 - c. The baseball purchased on December 24, 2024, bore a Fanatics authentication number that Fanatics confirmed was associated with a Clayton Kershaw autographed baseball.
 - d. The first baseball, purchased on September 5, 2024, contained a JSA authentication number that matched JSA records; however, JSA was unable to confirm through photographic evidence that the baseball corresponded to the issued Letter of Authenticity.
4. Upon discovering these discrepancies, the complainant attempted to return the baseballs. She successfully obtained full refunds for the two baseballs purchased through Amazon.com. She then attempted to return the remaining two baseballs purchased directly from Mister Man Cave. Mister Man Cave provided a return shipping label, and the complainant returned the items to the business address at 16855 Southpark Drive, Suite 500. Despite receipt of the returned items, Mister Man Cave failed to reimburse the complainant and ceased communication. The complainant further advised investigators that she was not alone in this experience and provided documentation of other customer reviews alleging that Mister Man Cave sold fraudulent or forged sports memorabilia.

5. The Westfield Police Department assigned the matter to a detective for further investigation. The detective determined that Amy Ettinger was the registered agent or member of several Indiana limited liability companies, including Mister Man Cave LLC, Mister ManCave LLC, Club Wag Investments LLC, and Game Time Autographs LLC. Investigators further determined that Amy Ettinger is now known as Amy Jean Lemieux and was married to Brett Lemieux.
6. The complainant provided investigators with transaction records, correspondence, and photographs documenting her dealings with Mister Man Cave. These materials included photographs of the baseballs and purported JSA authentication cards believed to be fraudulent.
7. Investigators verified the authentication numbers through JSA's official database. The authentication number for "Ball 1" matched the description on file; however, JSA requested physical submission of the baseball and authentication card for verification, as photographic review alone was insufficient to determine whether the card itself was counterfeit. This item remains unverified.
8. "Ball 2" bore JSA authentication number WP113921 and was represented as an Aaron Judge autographed baseball. JSA confirmed that this number was assigned to an "Aaron Judge signed MLB Debut Ticket."
9. "Ball 3" bore JSA authentication number WP113922 and was likewise represented as an Aaron Judge autographed baseball. JSA confirmed that this number was also assigned to an "Aaron Judge signed MLB Debut Ticket."

10. “Ball 4” bore Fanatics authentication number A295058 and was represented as an Aaron Judge autographed baseball. Fanatics confirmed that this number was assigned to a Clayton Kershaw autographed baseball.
11. Investigators conducted a social media and online marketplace review and located Mister Man Cave’s active eBay account. The account listed multiple sports memorabilia items for sale, including an “Isiah Pacheco signed autographed full-sized helmet” bearing JSA number WB284134. JSA confirmed that this number was assigned to an Isiah Pacheco signed football jersey, not a helmet.
12. Investigators further observed numerous negative customer reviews over the prior year alleging receipt of incorrect, damaged, or fraudulent items, including fake Certificates of Authenticity (“COAs”). In response, the account holder posted hostile replies, publicly disclosing customers’ personal information, including names, addresses, and phone numbers. Many reviewers stated that returned items were never refunded.
13. Investigators identified additional negative reports concerning Mister Man Cave. On January 19, 2025, a customer purchased thirty hockey pucks purportedly autographed by Wayne Gretzky. The customer reported that all autographs were identical and appeared to be produced using an autopen device. Investigators further observed that inventory for these items was replenished immediately after sales, indicating systematic relisting of identical fraudulent items.
14. Investigators obtained search warrants for Mister Man Cave’s Amazon.com and eBay storefronts. Amazon records showed that Mister Man Cave LLC sold sports memorabilia on Amazon since February 18, 2014. Payment card records were linked

to Amy Ettinger (Lemieux) and/or Brett Lemieux. From January 1, 2024, through December 30, 2024, Mister Man Cave generated \$1,842,447.20 in sales on Amazon.com.

15. eBay records revealed that the account “misterManCavelle” was created on January 11, 2014. Since inception, the account sold approximately 21,710 items totaling \$3,319,245 in sales. Between January 2024 and February 18, 2025 alone, the account sold 12,274 items totaling \$1,583,714. eBay records further documented thousands of buyer complaints regarding fraudulent, incorrect, or missing items. Records showed transfers totaling \$2,028,568.94 from eBay to a JP Morgan Chase account ending in -9563 owned by Mister ManCave LLC.
16. Investigators subpoenaed banking records from JP Morgan Chase from 2014 to the present. The records showed that account ending in -9563 functioned as the primary business account receiving Amazon and eBay proceeds. Funds were routinely transferred to pay for personal credit and debit cards belonging to Brett and Amy Lemieux, as well as purchases from memorabilia suppliers such as ScoreHere.com and Victory Collectibles. Funds were also used for ordinary personal expenses.
17. Lemieux and his co-conspirators further utilized this account to purchase supplies for the criminal enterprise. Sixty-two wire transfers totaling approximately \$386,879.00 were sent to a bank account in the Philippines, with notations such as “jerseys invoice payments” and “jerseys shirts.” These transfers occurred between April 12, 2021, and April 29, 2025. Investigators believe these transfers were used to purchase non-authentic jerseys from foreign manufacturers. Lemieux and his co-conspirators would then advertise and sell these products as authentic. Investigators located

emails between Lemieux and an unknown entity discussing pricing and quantity for the purchase of such jerseys.

18. Between May 13, 2024, and April 24, 2025, Lemieux and/or his co-conspirator transferred approximately \$607,355 from the -9563 account to another JP Morgan Chase account ending in -5909 in the name of Monon Motors LLC. These funds were used to purchase vehicles for resale.
19. Subpoenas served on Victory Collectibles and ScoreHere.com revealed that Lemieux and/or his co-conspirator purchased over 12,000 unsigned memorabilia items lacking authentication holograms, including helmets, mini helmets, footballs, hockey pucks, and bats.
20. Investigators consulted with Fanatics, JSA, and Beckett regarding authentication processes and detection of counterfeit memorabilia. These companies confirmed authentication requires in-person witnessing and proprietary holograms.
21. Fanatics confirmed that Mister Man Cave was previously investigated internally. Fanatics purchased items directly from Mister Man Cave and concluded they were fraudulent, including counterfeit Fanatics holograms. Fanatics further advised that Mister Man Cave used outdated hologram designs.
22. Investigators determined that Mister Man Cave sold memorabilia at prices significantly below market value compared to legitimate sellers.
23. Investigators interviewed a Westfield consumer who purchased a Peyton Manning signed Colts jersey from Mister Man Cave for \$510. Fanatics confirmed that the hologram on the jersey was counterfeit. Investigators located a similar item for sale on the Fanatics website for sale for \$899.99.

24. Indiana Department of Revenue records showed no state tax filings for Brett Lemieux. Amy Lemieux's reported income was modest, ranging from \$587.00 in 2023 to \$24,308.00 in 2015. No meaningful tax records existed for Mister Man Cave LLC or Club Wag Investments LLC.
25. Lemieux utilized the proceeds from his fraud operation to open and fund new businesses unrelated to sports memorabilia such as Monon Motors LLC (a car dealership), Club Wag Investments LLC (a company that owns real estate including real estate used as a short-term rental), and Freeze Dried Snack Company.
26. Lemieux and/or his co-conspirator also transferred funds from the JP Morgan Chase account ending in -9563 to other business ventures. From May 13, 2024, to April 24, 2025, Lemieux and/or his co-conspirator transferred approximately \$607,355 to another JP Morgan Chase account ending in -5909 in the name of Monon Motors. These funds were used to purchase vehicles to sell at Monon Motors.
27. Lemieux and/or his co-conspirator opened an account with JP Morgan Chase ending in -3679 which they utilized for Club Wag Investments and Freeze Dried Snack Company. On September 07, 2022, Lemieux and/or his co-conspirator transferred \$300,000.00 into this account from the JP Morgan Chase accounting ending in -9563. On September 7, 2022, a wire transfer was made to Title Services LLC escrow in the amount of \$272,251.34 from the account ending in -3679. Investigators believe this transaction was used to purchase real estate commonly known as 205 E. Hoover Street in Westfield, Indiana. On November 28, 2022, a second deposit was made into the JP Morgan Chase account ending in -3679 from the JP Morgan Chase account ending in -9563 in the amount of \$156,609.00. On

November 28, 2022, a wire transfer was made to Title Services LLC escrow in the amount of \$156,609.00. Investigators believe this transaction was used to purchase real estate commonly known as 217 E. Hoover Street in Westfield, Indiana.

28. Upon information and belief, Lemieux entered into an agreement with The Drees Company Inc. to build a new residence at 217 E. Hoover Street in Westfield, Indiana. As a part of this process, title for the real estate was transferred to The Drees Company Inc.
29. Between March 2023 and March 2024, Club Wag Investments LLC generated approximately \$125,000.00 through Airbnb rentals and Freeze Dried Snack Company sales. On March 26, 2024, an additional \$100,000.00 transfer funded the purchase of 340 E. Hoover Street in Westfield, Indiana.
30. Upon information and belief, Lemieux transferred all his known assets to a trust named the Clug Wag Trust on April 10, 2025.
31. Lemieux engaged in similar fraudulent conduct for over a decade. In 2012, his companies were sued by the Indiana Attorney General. On September 9, 2015 Lemieux entered into a consent judgment with the State of Indiana wherein he consented to an injunction from further violations of Indiana's Deceptive Consumer Sales Act and payment of restitution to victims. After Lemieux continued to violate State law and the injunction, the court held an evidentiary hearing on April 17, 2018. The court entered an order on May 29, 2018, enjoining Lemieux from "operating any company or website which sells sports memorabilia to consumers." The order did permit Lemieux to sell sports memorabilia through Amazon.com.

32. On July 16, 2025, Brett Lemieux publicly posted a detailed confession on social media admitting to decades of large-scale counterfeit sports memorabilia production and distribution, naming co-conspirators and describing extensive fraudulent practices. He posted the following:



Autographs 101

Brett Lemieux · 2h ·



Mistermancave has sold over 4 million items. Yes million. Surpassed 350 million in sales. Sold and produced holograms fanatics Tristar jsa Radtke tse sports Schwartz sports every gtsm player mill creek may's bonds you name it we made it. We sold over 5 million fanatics holograms alone outside what we produced to the biggest vendors in the industry. Jsa we made and produced over 3 million counterfeit stickers and holograms. Steiner sports. Wow. We made yellow cards holograms and then numbered sets in the millions. Panini. Oh yea almost forgot. We produced holograms and cards for their entire database. When Kobe died we put out 80,000 items into the market place. Sold over 500,000 counterfeit panini items.

Dominique ball of Carmel Indiana was the sole person who put out the 100,000 tom Brady items in the market. He was the source of it all along with Nicklaus litcher. He funneled every item dom produced. Dominique sold under the name dilliano which was his brother and multiple Florida accounts with the name Steve Jordan and all those accounts riddled with Dom's work.

He's the one who showed me the dark side of the industry and the money that can be made.

Dominique was the original artist for the holograms then it turned into auto pen. You can buy a 150 auto pen on Amazon have people overseas vectorize signature and use ink scape to auto pen.

There has been nothing like this since operation bullpen. We sourced it signed it certified it and sold it all over the us for 20 years. Ultimate sports. Athletes one. Signature dog. All American authentic. And mister fucking mancave. We are going to be what



Autographs 101

Brett Lemieux · 2h ·



There has been nothing like this since operation bullpen. We sourced it signed it certified it and sold it all over the us for 20 years. Ultimate sports. Athletes one. Signature dog. All American authentics. And mister fucking mancave. We are going to be what records are made of. No one's ever sold the volume of items and holograms ever. We started with blue mounted memories cards and holograms when I met Dominique , Patrick Riley of Carmel Indiana (he was partners with Dominique) and met with the hologram ladies in China himself for us. It was an addiction. How many items can I sell and give a front of a huge company. I did it for years. Purchased millions of dollars of legit items. Mixed it until Dominique found the hologram connect. Then I had the bank roll to buy even more. Do more signings. Every one item from a signing turned into 10,000. And it was certified. 95% of the Mahomes and Aaron judge on the market are sold by me. Basically every autograph sold in the last 25 years you should have it looked at. It's fake and someone sold it to you other than me. I wish I had the exact dollar number of money taken in from this and I'll go to my grave never knowing. I kept this secret from everyone. If you knew in the industry you knew. No family. No friends. No one. Even employees who worked for me had no idea. It was ran that well. The building was seized and I let it happen. The run is done. There's over 500-700 MILLION dollars in value of holograms and cards in there. Let that sink in. Every company I've touched is now my bitch. That was my goal. Once you came at me or spoke my name I went after you and your company directly. Intentionally. Tristar. We made so many fake holograms and even your newest ones been sold. 97% of tom Brady Tristar is fake. We sold fake tom Brady for 12 years. Steiner came at me then



Autographs 101

Brett Lemieux · 2h ·



fake tom Brady for 12 years. Steiner came at me then folded. Fanatics I bought so much they didn't know what to say or do but when you ran your mouth and what Michael Ruben thinks he's done to the industry I set out to make as many fanatics counterfeit stickers I could. Millions upon millions.

There will be photos of this bust I'm sure of it. If it was fanatics they may try to bury it all but the Westfield police department came today at 9am with semi trucks. I hope no one tries to hide this. I want to expose it all and how big of operation you all knew was going on but grasp how big it was.

I wish I could write a book about this.

I always took it as a challenge. Started slow and bad. And shifted to the giant that was built. I spent sleepless nights planning what items to counterfeit next. I had every hologram we ever made extracted from every companies database and put into excel. So with a touch of a button I can type mahomes and a bin shoots out with every Mahomes sticker hologram or coa card. Every item automated and sorted. I'd spend countless hours scrolling excel finding my next score. It was a thrill having every athlete in every sport from every authentication company at your finger tips to produce the signature flawless authenticate it with flawless bootleg holograms and then sell it for half of what a company does by the 1000s. That's all I spent my time and my life on. What was the next item to do. Next name. Next flawless signature. I was addicted. It was a rush. I wanted out. But the money was too good. I can make 100,000 in a week if I wanted to. The fact that not one dealer that knew what we were doing to the



Autographs 101

Brett Lemieux · 2h ·



athlete in every sport from every authentication company at your finger tips to produce the signature flawless authenticate it with flawless bootleg holograms and then sell it for half of what a company does by the 1000s. That's all I spent my time and my life on. What was the next item to do. Next name. Next flawless signature. I was addicted. It was a rush. I wanted out. But the money was too good. I can make 100,000 in a week if I wanted to. The fact that not one dealer that knew what we were doing to the industry, or when I took their exclusive no one ever picked up a phone to confront me. That baffled me. I told multiple dealers I will ruin you and your exclusive. They knew better. Once the heat turns on. New company same game but make it better than the last that got you caught up. Every company made changes. We did too. They added security. We did too. There was nothing that couldn't be done. I sat on an auto pen machine 8 hours a day perfecting signatures that would pass any coa. It even passed by own players during signings we'd mix in items. What would you do if you could create any signature on any surface flawlessly and have the holograms to boot. I just couldn't stop. You will see a boom in bad autographs with good stickers hitting the market like a fire storm. I sold over 2 million in just holograms to every avenue I could.

Enjoy the industry all.

COUNT 1: RACKETEER INFLUENCE CORRUPT ORGANIZATION ENTERPRISE

Comes now the Plaintiff, by counsel, and complains of the Defendants and for its claim for relief, alleges and says:

33. Plaintiff restates and repleads each and every allegation contained in the previous paragraphs, and each of those paragraphs is incorporated in Count 1.

34. Over a period of time Lemieux and his co-conspirators have participated in, constructed, and continued to operate a “corrupt enterprise” through a pattern of racketeering activity, as defined by statute, in that each of them individually and together in concert, along with other known, unknown and unnamed co-conspirators, has engaged in conduct in the furtherance of an enterprise in which Lemieux and his co-conspirators committed the crimes of fraud, forgery, counterfeiting, money laundering, and corrupt business influence.

35. Lemieux and other unnamed persons have engaged in a pattern of racketeering activity, deriving therefrom, profits, property, and income, obtained with the funds and with the profits from the enterprise, and said income, profits, and property, are subject to forfeiture pursuant to the Indiana Racketeer Influence Corrupt Organization Statute, Indiana Code Sec. § 34-24-2-1 et seq.

36. At all relevant times, Brett Lemieux, the Club Wag Trust dated April 10, 2025, Mister Man Cave LLC, Monon Motors LLC, Club Wag Investments LLC, and other known and unknown co-conspirators constituted an **enterprise** within the meaning of Indiana Code § 34-24-2-3.

37. As set forth above, Lemieux constructed and operated a large-scale fraud and forgery operation wherein he and his co-conspirators sold sports memorabilia which he held out as authentic. By his own confession, Lemieux's utilized the corporate entity Mister Man Cave LLC to operate his criminal enterprise.
38. Lemieux's illegal operation created significant profit. Lemieux used that profit to fund and start other businesses such as Monon Motors LLC, Freeze Dried Snack Co., and ClubWag Investments LLC.
39. The enterprise utilized Mister Man Cave LLC as the primary vehicle to generate illicit proceeds. Funds obtained through fraudulent sales were deposited into JP Morgan Chase business account ending in **-9563**, which functioned as the central account for the criminal enterprise.
40. Proceeds deposited into account -9563 were subsequently transferred to additional accounts, used to purchase assets, pay personal expenses, fund additional business ventures, and acquire real and personal property.
41. The movement of funds through multiple accounts and entities, including Monon Motors LLC and Club Wag Investments LLC, constituted financial transactions designed to conceal and disguise the nature, source, ownership, and control of proceeds of unlawful activity, thereby rendering all traceable property subject to forfeiture.
42. Plaintiff seeks forfeiture of the following property held and/or owned by Mister Man Cave LLC as this property was either used in the course of, intended for use in the

course of, derived from, or realized through Lemieux and/or his co-conspirator's criminal actions:

- a. Funds held at JP Morgan Chase Bank in multiple accounts.
- b. Sports memorabilia and other property seized from 16855 Southpark Drive in Westfield, Indiana.

43. Plaintiff seeks forfeiture of the following property held and/or owned by Monon Motors LLC as this property was either used in the course of, intended for use in the course of, derived from, or realized through Lemieux and/or his co-conspirators' criminal actions:

- | | |
|-----------------------------------|-------------------|
| a. 1997 Land Rover Defender 110 | SALLDHMF7TA983534 |
| b. 2019 CanAM Ryker | 3JB2GEG46KJ004021 |
| c. Icon LT_A617 golf cart | |
| d. 2020 Can AM Maverick | 3JBVXAV41LK000754 |
| e. 2023 Interstate trailer | 4RALS2428PG005296 |
| f. 2022 Titanium cargo trailer | 7PLBC2426NM001920 |
| g. 2022 Polaris RZR XP 1000 | 3NSNAV99XNH415324 |
| h. 2015 Carry On Trailer | 4YMUL0817FG038165 |
| i. 2020 Can AM Commander Max | 3JBKUAX23LJ000123 |
| j. 2020 Can AM Ryker 600 Ace | 3JB2FEF21LJ002164 |
| k. 1985 Land Rover Defender | SALLDHMC8BA228084 |
| l. 2012 Toyota Sienna XLE minivan | 5TDYK3DC2CS215223 |
| m. 1988 Land Rover Defender | SALLDHMF7JA912843 |
| n. 2014 Ford Flex | 2FMHK6C89EBD31307 |

o. 2008 Nissan 350Z	JN1BZ36A38M851216
p. 2019 BMW 430i	WBA4J1C56KBM14707
q. 2015 Tesla	5YJSA1E45FF113976
r. 2019 Tesla	5YJSA1E2XKF347894
s. 2019 Tesla	5YJXCDE23KF162314
t. 2022 Tesla	7SAYGAEE1NF322490
u. 2013 Cadillac SRX	3GYFNDE30DS634049
v. Ram cargo van	3C6URVHG9GE117736
w. Range Rover Defender	SALLDHMV1BA232408
x. Range Rover Defender	SALLDV BV7FA377795
y. Ford E450 RV	1FDXE4FS8HDC28201
z. 2023 Formula trailer	5JW9E1216PB102884
aa. 2012 Ford Escape	1FMCU0DG5CKA47084
bb. 2014 Chevrolet Silverado	3GCUKTEC8EG305409
cc. 2019 Porsche Panamera	WP0AB2A79KL128065

44. Plaintiff seeks forfeiture of the following property held and/or owned by ClubWag Investments LLC as this property was either used in the course of, intended for use in the course of, derived from, or realized through Lemieux and/or his co-conspirators' criminal actions:

- a. Real estate commonly known as 340 E. Hoover Street in Westfield, Indiana.
- b. Real estate commonly known as 205 E. Hoover Street in Westfield, Indiana.

45. Plaintiff seeks forfeiture of the real estate commonly known as 217 E. Hoover Street in Westfield, Indiana as it was either used in the course of, intended for use in the

course of, derived from, or realized through Lemieux and/or his co-conspirators' criminal actions.

WHEREFORE, the Plaintiff prays for the following relief:

A. Enter judgment declaring that the above-described property constitutes proceeds of, property derived from, and property used to facilitate a pattern of racketeering activity;

B. Order the forfeiture of all such property to the State of Indiana pursuant to Indiana Code § 34-24-2;

C. Authorize the seizure, retention, management, and disposition of forfeited property as provided by law; and

D. Grant all other relief the Court deems just and proper.

Respectfully submitted,

RILEYCATE, LLC

/s/ Joshua N. Taylor

Joshua N. Taylor

Attorney for Plaintiff

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