

United States District Court
Western District of Texas
San Antonio Division

United States of America,
Plaintiff,

v.

Devin Ward Elder,
Defendant.

Case No. SA-26-CR-00038-FB

**Motion to Confirm the Sale of 4335 Culebra in San Antonio, Texas
and to Escrow Proceeds**

The Receiver has entered into a contract to sell 4335 Culebra, San Antonio, Texas 78228 (the “Property”) to Brier Village Investment, LLC (the “Buyer”) for \$650,000.

On February 18, 2026, the Court granted the Government’s motion to appoint Dan Kubinski as Receiver and permitted the interlocutory sale of numerous real properties identified in Government’s Motion to Appoint Receiver (Doc. No. 19). The Receivership Order identifies the Property as (b). The Property as legally described:

Lot 22, Block 1, NCB 13598, Elite Culebra Subdivision, a subdivision in city of San Antonio, Bexar County, Texas, as shown on the plat recorded in Volume 2002, Page 1046, Plat Records of Bexar County, Texas. APN/Parcel ID: 13598-001-0220. Tax/Map ID: 1354024.

The Buyer has offered \$650,000.00 for the Property. The Receiver and Buyer reached this price through a negotiated, arms-length process. The Receiver is satisfied that the price represents the fair market value for the Property.

The Property’s 2024 tax value was approximately \$621,000. The Property’s original listing price was approximately \$1,200,000 then gradually reduced to approximately \$700,000. The Receiver believes the offered price represents the fair market value for the Property. The net amount expected to be received on account of this sale for the benefit of victims is approximately \$580,000.00 after brokerage fees, ad valorem taxes, property taxes and other standard closing

costs. The Receiver shall hold these funds in an escrow account consistent with the Receivership Order, and subject to further order of the Court.

WHEREFORE, the United States of America requests an order of this Court confirming the sale of 4335 Culebra, San Antonio, Texas 78228.

Respectfully submitted,

JUSTIN R. SIMMONS
United States Attorney

By: /s/ Steven E. Seward

STEVEN E. SEWARD

Assistant United States Attorney

Florida Bar No. 29546

601 N.W. Loop 410, Suite 600

San Antonio, Texas 78216

Telephone: (210) 384-7259

Facsimile: (210) 384-7247

E-mail: Steven.Seward@usdoj.gov

ATTORNEY FOR UNITED STATES

Certificate of Service

I hereby certify that on June 11, 2026, I electronically filed this document with the Clerk of Court using the CM/ECF system which will send notice to CM/ECF participant(s):

John Gilmore
Goldstein & Orr
315 E. Commerce Street, Suite 301
San Antonio, Texas 78205
Attorney for Defendant

/s/ Steven E. Seward

STEVEN E. SEWARD

Assistant United States Attorney