

1 McGREGOR W. SCOTT  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States

6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$117,151.48 SEIZED  
FROM BANK OF AMERICA ACCOUNT  
15 NUMBER 5010 1714 7633,

16 APPROXIMATELY \$43,882.17 SEIZED  
FROM BANK OF AMERICA ACCOUNT  
17 NUMBER 5010 0170 0675,

18 APPROXIMATELY \$5,713.82 SEIZED  
FROM BANK OF AMERICA ACCOUNT  
19 NUMBER 1641 0242 5652,

20 APPROXIMATELY \$4,436.39 SEIZED  
FROM BANK OF AMERICA ACCOUNT  
21 NUMBER 5010 1940 4044,

22 APPROXIMATELY \$60,328.73 SEIZED  
FROM UNIWYO FEDERAL CREDIT  
23 UNION ACCOUNT NUMBER 61324,

24 APPROXIMATELY \$29,438.90 SEIZED  
FROM MECHANICS BANK ACCOUNT  
25 NUMBER 42073421,

26 APPROXIMATELY \$23,077.78 SEIZED  
FROM FIRST CITIZENS BANK  
27 ACCOUNT NUMBER 001064426523,  
28

2:18-MC-00013-WBS-AC

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

1 APPROXIMATELY \$22,852.67 SEIZED  
2 FROM 1ST BANK, A DIVISION OF  
3 GLACIER BANK, ACCOUNT NUMBER  
4 910600008915,

5 APPROXIMATELY \$21,492.09 SEIZED  
6 FROM WYOCHEM FEDERAL CREDIT  
7 UNION ACCOUNT NUMBER 37648 (S9),

8 APPROXIMATELY \$12,397.47 SEIZED  
9 FROM HIGH DESERT BANK ACCOUNT  
10 NUMBER 4042002813,

11 APPROXIMATELY \$8,209.08 SEIZED  
12 FROM HIGH DESERT BANK ACCOUNT  
13 NUMBER 4042002826,

14 APPROXIMATELY \$6,350.56 SEIZED  
15 FROM PATELCO CREDIT UNION  
16 ACCOUNT NUMBER 473661,

17 APPROXIMATELY \$7,717.13 SEIZED  
18 FROM UMPQUA BANK ACCOUNT  
19 NUMBER 4863921948,

20 APPROXIMATELY \$3,213.75 SEIZED  
21 FROM SAFE CREDIT UNION ACCOUNT  
22 NUMBER 822910 (9),

23 APPROXIMATELY \$10,857.37 SEIZED  
24 FROM TRI COUNTIES BANK  
25 ACCOUNT NUMBER 491039991,

26 APPROXIMATELY \$6,798.26 SEIZED  
27 FROM EL DORADO SAVINGS BANK  
28 ACCOUNT NUMBER 0053012902,

2015 MERCEDES-BENZ, ML350, VIN:  
4JGDA5HB9FA479275,

2016 FORD, F150 SUPER CAB PICKUP,  
VIN: 1FTFX1EGXGKG04896, and

2017 FORD, F250 SUPER DUTY PICKUP,  
VIN: 1FT7X2BT6HEB22700,

Defendants.

It is hereby stipulated by and between the United States of America and potential claimants James Mecham, Kurt D. Stocks, and Heidi Edwards (“claimants”), by and through their respective counsel, as follows:

1           1.       On or about November 7, 2017, the Internal Revenue Service-Criminal Investigation  
2 (“IRS-CI”) seized the above-referenced defendant assets pursuant to Federal seizure warrants.  
3 (hereinafter collectively “defendant assets”).

4           2.       Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to  
5 send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or obtain an  
6 indictment alleging that the defendant assets are subject to forfeiture within ninety days of seizure, unless  
7 the court extends the deadline for good cause shown or by agreement of the parties. That deadline was  
8 February 5, 2018.

9           3.       By Stipulation and Order filed February 6, 2018, the parties stipulated to extend to May 4,  
10 2018, the time in which the United States is required to file a civil complaint for forfeiture against the  
11 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

12           4.       By Stipulation and Order filed April 26, 2018, the parties stipulated to extend to August 3,  
13 2018, the time in which the United States is required to file a civil complaint for forfeiture against the  
14 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

15           5.       By Stipulation and Order filed July 27, 2018, the parties stipulated to extend to  
16 November 1, 2018, the time in which the United States is required to file a civil complaint for forfeiture  
17 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
18 to forfeiture.

19           6.       By Stipulation and Order filed October 25, 2018, the parties stipulated to extend to  
20 February 1, 2019, the time in which the United States is required to file a civil complaint for forfeiture  
21 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
22 to forfeiture.

23           7.       By Stipulation and Order filed January 28, 2019, the parties stipulated to extend to  
24 May 1, 2019, the time in which the United States is required to file a civil complaint for forfeiture against  
25 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
26 forfeiture.

27           8.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
28 to July 30, 2019, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
2 to forfeiture.

3 9. Accordingly, the parties agree that the deadline by which the United States shall be  
4 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment  
5 alleging that the defendant assets are subject to forfeiture shall be extended to July 30, 2019.

6 Dated: 4/29/2019

McGREGOR W. SCOTT  
United States Attorney

7  
8 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
9 Assistant U.S. Attorney

10  
11 Dated: 4/26/19

/s/ Thomas A. Johnson  
THOMAS A. JOHNSON  
12 Attorney for Potential Claimant  
13 James Mecham

14 Dated: 4/26/19

/s/ Mark J. Reichel  
MARK J. REICHEL  
15 Attorney for Potential Claimant  
16 Kurt D. Stocks

17 Dated: 4/29/19

/s/ Matthew Bockmon  
MATTHEW BOCKMON  
18 Attorney for Potential Claimant  
19 Heidi Edwards

20 (Signatures authorized by email)

21 **IT IS SO ORDERED.**

22 Dated: April 29, 2019



23 WILLIAM B. SHUBB  
24 UNITED STATES DISTRICT JUDGE