

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 and Kurt D. Stocks (“claimants”), by and through their respective counsel, and potential claimant Heidi Edwards, in *propria persona*, 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 (hereafter 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 is
8 February 5, 2018.

9 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May
10 4, 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. Accordingly, the parties agree that the deadline by which the United States shall be

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
2 alleging that the defendant assets are subject to forfeiture shall be extended to May 4, 2018.

3 Dated: 12/20/17

McGREGOR W. SCOTT
United States Attorney

4
5 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

6
7
8 Dated: 1/4/18

/s/ Thomas A Johnson
THOMAS A. JOHNSON
Attorney for Potential Claimant
James Mecham
(Authorized by email)

9
10
11
12 Dated: 1/5/18


/s/ Mark J. Reichel
MARK J. REICHEL
Attorney for Potential Claimant
Kurt D. Stocks
(Authorized by email)

13
14
15
16 Dated: 1/31/18

/s/ Heidi Edwards
HEIDI EDWARDS
Potential Claimant appearing
in *propria persona*
(Signature retained by attorney)

17
18
19
20 **IT IS SO ORDERED.**

21 Dated: February 6, 2018



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE