

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.

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

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

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.       By Stipulation and Order filed April 30, 2019, the parties stipulated to extend to  
28 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. By Stipulation and Order filed July 29, 2019, the parties stipulated to extend to  
4 October 28, 2019, the time in which the United States is required to file a civil complaint for forfeiture  
5 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
6 to forfeiture.

7 10. By Stipulation and Order filed October 21, 2019, the parties stipulated to extend to  
8 January 27, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
10 to forfeiture.

11 11. By Stipulation and Order filed January 28, 2020, the parties stipulated to extend to  
12 April 24, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
14 to forfeiture.

15 12. By Stipulation and Order filed April 15, 2020, the parties stipulated to extend to  
16 July 23, 2020, 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 13 By Stipulation and Order filed July 17, 2020, the parties stipulated to extend to  
20 October 21, 2020, 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 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
24 to January 19, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
25 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
26 to forfeiture.

27 ///

28 ///

1           15.     Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment  
3 alleging that the defendant assets are subject to forfeiture shall be extended to January 19, 2021.

4 Dated: 10/20/2020

McGREGOR W. SCOTT  
United States Attorney

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

7  
8 Dated: 10/20/2020

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

9  
10  
11 Dated: 10/20/2020

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


12  
13  
14 Dated: 10/20/2020

/s/ Benjamin Galloway  
BENJAMIN GALLOWAY  
Attorney for Potential Claimant  
Heidi Edwards

(Signatures authorized by email)

15  
16  
17  
18 **IT IS SO ORDERED.**

19 Dated: October 20, 2020

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE