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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,

2:18-MC-00013-WBS-AC

12 Plaintiff,

13 v.

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. By Stipulation and Order filed October 21, 2020, the parties stipulated to extend to
24 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 15. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
28 to April 19, 2021, 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 16. 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 April 19, 2021.

6 Dated: 1/19/2021

McGREGOR W. SCOTT
United States Attorney

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

9
10 Dated: 1/14/2021

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

11
12
13 Dated: 1/19/2021

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

14
15
16 Dated: 1/14/2021

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

(Signatures authorized by email)

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20 **IT IS SO ORDERED.**

21 Dated: January 20, 2021



22 **WILLIAM B. SHUBB**
23 **UNITED STATES DISTRICT JUDGE**