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5 Attorneys for the United States
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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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,
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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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
13 to August 3, 2018, the time in which the United States is required to file a civil complaint for forfeiture
14 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
15 to forfeiture.

16 5. Accordingly, the parties agree that the deadline by which the United States shall be

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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 August 3, 2018.

3 Dated: 4/23/18

McGREGOR W. SCOTT
United States Attorney

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

7
8 Dated: 4/23/18

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

10
11
12 Dated: 4/23/18

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

14
15
16 Dated: 4/23/18

/s/ Matthew Bockman
MATTHEW BOCKMAN
Attorney for Potential Claimant
Heidi Edwards
17 (Authorized by email)

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20 **IT IS SO ORDERED.**

21 Dated: April 25, 2018



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