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

10
 11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 2011 BMW 328I, VIN: WBAPH7C53BE460537,
 NEVADA LICENSE NUMBER 002F10, et al.,
 15
 16 Defendants.

2:19-MC-00053-TLN-CKD

STIPULATION AND PROPOSED
 ORDER FOR INTERLOCUTORY SALE
 OF SEIZED PROPERTY

17 It is hereby STIPULATED between the United States of America, by its attorney, McGregor
 18 W. Scott, United States Attorney for the Eastern District of California, Kevin C. Khasigian and Andre
 19 Espinosa, Assistant United States Attorneys, and Jeffrey Carpoﬀ and Paulette Carpoﬀ (“Carpoﬀs”),
 20 by and through their attorney, to enter into an Interlocutory Sale agreement regarding the seized
 21 vehicles listed below (“defendant vehicles”), consent to the following:

- 22 1. The defendant vehicles that are the subject of this stipulation are:
- 23 1) 2011 BMW 328i, VIN: WBAPH7C53BE460537,
 - 24 Nevada License Number 002F10,
 - 25 2) 1972 Chevrolet Cheyenne, VIN: CKE242Z132361,
 - California License Number 11103Z1,
 - 26 3) 2013 BMW 328i, VIN: WBA3C1C59DF437139,
 - Nevada License Number 187LUR,
 - 27 4) 1982 Chevrolet Camaro Z28, VIN: 1G1AP87H4CL116100,
 - California License Number 1ELA341,
 - 28 5) 1972 GMC Truck, VIN: TCE242Z515922, California License Number
 1T51268,

- 6) 2018 Bennington Pontoon Boat With Trailer, VIN: ETWF4636L718, California License Number 4RT9953,
- 7) 2013 Dodge Ram, VIN: 3C6UR5HL2DG558010, California License Number 44279K1,
- 8) 1970 Plymouth Satellite Belvedere, VIN: RS23U0E128051, California License Number 4GAV377,
- 9) 1930 Cord L29 Brougham, VIN: FDA1785, California License Number 4TXV139,
- 10) 1959 Chriscraft 1017 Boat With Trailer, VIN: CL180793, California License Number 5474AM,
- 11) 1993 Hummer, VIN: 137XE8239PE134334, California License Number 56006T1,
- 12) 2018 Dodge Ram, VIN: 3C6UR5CL3JG169184, California License Number 60838K2,
- 13) 2018 Dodge Ram, VIN: 3C6UR5CL0JG169188, California License Number 60839K2,
- 14) 2018 Dodge Ram, VIN: 3C6UR5CL3JG169189, California License Number 60840K2,
- 15) 2018 Dodge Ram, VIN: 3C6UR5CL3JG169181, California License Number 60841K2,
- 16) 2018 Dodge Ram, VIN: 3C6UR5CL3JG169182, California License Number 60842K2,
- 17) 2018 Dodge Ram, VIN: 3C6UR5CL3JG169185, California License Number 60843K2,
- 18) 2014 Dodge Ram, VIN: 3C6UR5FL1EG233322, California License Number 64962S1,
- 19) 2015 Dodge Ram, VIN: 3C6UR5CL2FG502255, California License Number 64971S1,
- 20) 2017 Cadillac CTS-V, VIN: 1G6A15S67H0183167, Nevada License Number 658F22,
- 21) 2018 Dodge Challenger SRT Demon, VIN: 2C3CDZH95JH100279, Nevada License Number 659F22,
- 22) 1970 Plymouth Superbird, VIN: RM23V0A167083, California License Number 6DVY570,
- 23) 2012 Jaguar XKR, VIN: SAJWA4DC7CMB44732, California License Number 6YOX011,
- 24) 2015 Honda CRF 250R, VIN: JH2ME1035FK201853, California License Number 74KH63,
- 25) 1967 Autobianchi Panoramica Wagon, VIN: 120B142281, California License Number 7BEM152,
- 26) 1971 Dodge Super Bee, VIN: WM23V1A173563, California License Number 7DLR984,
- 27) 2014 Jaguar XK, VIN: SAJWA4HA5EMB52629, California License Number 7FDR207,
- 28) 2014 Fiat 500, VIN: 3C3CFFCR1ET288120, California License Number 7GWT291,
- 29) 2014 Tesla Model S, VIN: 5YJSA1H15EFP51645, California License Number 7HGR947,
- 30) 2014 Tesla Model S, VIN: 5YJSA1H26EFP68172, California License Number 7JSS179,
- 31) 2015 Dodge Challenger SRT, VIN: 2C3CDZC98FH713883, California License Number 7KBZ711,
- 32) 2015 Dodge Challenger SRT, VIN: 2C3CDZDJ8FH809540, California License Number 7KXJ876,
- 33) 2015 Dodge Challenger SRT Hellcat, VIN: 2C3CDZC94FH887952, California License Number 7NHW077,

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- 34) 1964 Austin Cooper, VIN: AA257L5515A, California License Number 7SDS787,
- 35) 1993 Hummer H1, VIN: 137XE8332PE134593, California License Number 7VKM941,
- 36) 1969 Plymouth Roadrunner, VIN: RM23H9E153996, California License Number 7VKN032,
- 37) 1966 Chevrolet Chevelle SS, VIN: 138176A119342, California License Number 7WFU475,
- 38) 1964 Fiat Nuova, VIN: 764686, California License Number 7WFU476,
- 39) 1970 Plymouth Barracuda, VIN: BS23J0B303477, California License Number 7WFU477,
- 40) 1939 Cadillac Imperial Touring Sedan, VIN: 3290914, California License Number 7WFU478,
- 41) 1967 Chrysler 300 Convertible, VIN: CM27K73147483, California License Number 7WFU726,
- 42) 1967 Oldsmobile Cutlass, VIN: 338077M149183, California License Number 7WFU727,
- 43) 1993 AM General Military Vehicle, VIN: TEX114199, California License Number 7WTU606,
- 44) 1971 Chevrolet Camaro Z28, VIN: 124871N517540, California License Number 7WTU607,
- 45) 1965 Plymouth Fury LAPD Tribute, VIN: P152236018, California License Number 7WTU782,
- 46) 1991 AM General M998, VIN: TEX114208, California License Number 7WTU783,
- 47) 1965 Fiat 600, VIN: 1949816, California License Number 7XAU162,
- 48) 1970 Plymouth Barracuda, VIN: BS23J0B298749, California License Number 7XAU163,
- 49) 1970 Plymouth Superbird, VIN: RM23V0A170197, California License Number 7XSV702,
- 50) 1961 Volkswagen Beetle, VIN: 3696311, California License Number 7XSV703,
- 51) 1969 Dodge Charger 500, VIN: XX29J9B164192, California License Number 7XSV704,
- 52) 1969 Chevrolet Camaro, VIN: 124379N635549, California License Number 7XSV706,
- 53) 1967 Dodge Dart, VIN: LL21B72329178, California License Number 7XSV707,
- 54) 1966 Chevrolet Chevelle, VIN: 136176A118169, California License Number 7XSV708,
- 55) 1932 Ford Roadster, VIN: OR83925, California License Number 7XSV709,
- 56) 1970 Dodge Challenger, VIN: JS29V0B141330, California License Number 7XSV772,
- 57) 1968 Chevrolet Camaro, VIN: 124378N440580, California License Number 7XSV773,
- 58) 2013 Dodge Ram, VIN: 1C6RR6KT1DS532270, California License Number 80507H1,
- 59) 2017 Bentley Continental GT, VIN: SCBFH7ZA6HC063107, California License Number 8ACL402,
- 60) 1982 Chevrolet Camaro Z28, VIN: 1G1AP87H4CL116100, California License Number 1ELA341,
- 61) 2017 Chevrolet Volt, VIN: 1G1RD6S56HU191587, California License Number 7ZRE805,
- 62) 2013 Dodge Ram, VIN: 1C6RR6KT1DS532270, California License Number 80507H1,

- 1 63) 2018 Chevrolet Volt, VIN: 1G1RD6S58JU116623,
California License Number 8CBD635,
- 2 64) 2018 Chevrolet Volt, VIN: 1G1RD6S55JU113937,
California License Number 8CBD637,
- 3 65) 2007 Dodge Ram, VIN: 1D7HA16N47J619123,
California License Number 8N08892,
- 4 66) 2018 Dodge Ram, VIN: 3C6UR5CL9JG169187,
California License Number 99980J2,
- 5 67) 1948 Chevrolet Panel Van, VIN: FBA310883,
California License Number E21778,
- 6 68) 2002 Dodge Viper, VIN: 1B3ER65E32V102144,
California License Number T642880,
- 7 69) 1935 Chrysler Airflow, VIN: 6605776, California License Number T643087,
- 8 70) 2007 Ford Mustang Shelby GT 500 Supersnake, VIN: 1ZVHT88S375200007,
Unknown License Number,
- 9 71) 1981 Pontiac Trans Am, VIN: 1G2AW87T1BL131624,
California License Number X276321,
- 10 72) 1978 Pontiac Trans Am, VIN: 2U87L8N183594, California License Number
X276485,
- 11 73) 1964 Pontiac GTO, VIN: 824M4472, California License Number 7KWT492,
- 12 74) 1968 Plymouth GTX, VIN: RS23J8G191594,
California License Number 7JZB680,
- 13 75) 1967 Ford Mustang Fastback, VIN: 7R02S164966,
California License Number 7KWT493,
- 14 76) 1970 Dodge Challenger Convertible, VIN: JH27G0B296419,
California License Number 7JZC032,
- 15 77) 1970 Plymouth Superbird, VIN: RM23U0A170840,
California License Number 7KWT735,
- 16 78) 1967 Ford Mustang Shelby GT 500E Supersnake, VIN: CSE67431F11SS030,
Unknown License Number,
- 17 79) 1939 Buick Roadmaster, VIN: NM69226, California License Number
7KWT697,
- 18 80) 1962 Oldsmobile Jetfire, VIN: 621K09834,
California License Number 7NYB001,
- 19 81) 1967 Autobianchi Panoramica Wagon, VIN: 120B121339,
California License Number 7LXR133,
- 20 82) 1970 Plymouth Roadrunner, VIN: RM21V0G160968,
California License Number 6VMA705,
- 21 83) 1971 Chevrolet Camaro, VIN: 124871N533590,
California License Number 7NYB002,
- 22 84) 2016 Provoost Outlaw Motorhome, VIN: 2PCV33492GC713105,
California License Number 7KWT492,
- 23 85) 2011 Dodge Ram 3500, VIN: 3D73Y3HL9BG569763,
California License Number 8X15783,
- 24 86) 1951 Chevrolet Thriftmaster 3100, VIN: 3JPL3991, Unknown License
Number,
- 25 87) 1969 Chevrolet El Camino, VIN: 36809Z311105,
Oregon License Number 335JEK,
- 26 88) 1969 Chevrolet Camaro, VIN: 124379N652463, Unknown License
Number,
- 27 89) 1969 Chevrolet Camaro, VIN: 124379N675016, Unknown License Number,
- 28 90) 1967 Chevrolet Camaro, VIN: 124377L119172, Unknown License Number,
- 91) 1967 Chevrolet Camaro, VIN: 124677L137885, Unknown License Number,
- 92) 1968 Chevrolet Nova, VIN: 113278W232040, Unknown License Number,
- 93) 1960 Volkswagen Beetle, VIN: 3003841, Unknown License Number,

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- 94) 1968 Fiat 600, VIN: 2337702, Unknown License Number,
- 95) 1967 Fiat Autobianchi, VIN: 020239, Unknown License Number,
- 96) 1969 Nash Metropolitan, VIN: E66354, Unknown License Number,
- 97) 1962 Chevrolet Nova, VIN: 204370154424, California License Number 4GAM229,
- 98) 2018 Chevrolet Volt, VIN: 1G1RD6S52JU115029, California License Number 8CBD639,
- 99) 2018 Chevrolet Volt, VIN: 1G1RD6S53JU112186, California License Number 8CBD636,
- 100) 2018 Chevrolet Volt, VIN: 1G1RD6S59JU116355, California License Number 8CBD638,
- 101) 2005 Ford F-150, VIN: 1FTPW14515FB75323, California License Number 7Y10108,
- 102) 2015 Dodge Ram 2500, VIN: 3C6UR5FL9FG502250, California License Number 65188S1,
- 103) 2015 Dodge Ram 1500, VIN: 3C6JR6DM5EG332861, California License Number 75172T1,
- 104) 2015 Dodge Ram 2500, VIN: 3D7KS26C76G117357, California License Number 8Y16761,
- 105) 1968 Fiat 500F, VIN: 1689070, Unknown License Number,
- 106) 1973 Fiat 500, VIN: 5129918, Unknown License Number,
- 107) 1960 Austin Healey 3000, VIN: HBT7L5195, Unknown License Number,
- 108) 2003 Mercedes Benz G500, VIN: WDCYR49E03X140019, Unknown License Number,
- 109) 1967 Chevrolet El Camino, VIN: 136807Z137048, Unknown License Number,
- 110) 1941 Plymouth Special Deluxe, VIN: P10255970A, Unknown License Number,
- 111) 1970 Plymouth Roadrunner, VIN: RM21N0E140614, Unknown License Number,
- 112) 1965 Ford Mustang Fastback, VIN: 5F09T606756, Unknown License Number,
- 113) 1971 Dodge Challenger, VIN: JH23G1B304722, Unknown License Number,
- 114) 2010 Chevrolet Camaro, VIN: 2G1FT1EW1A9126145, Unknown License Number,
- 115) 1954 Chevrolet Bel Air, VIN: B540023782, California License Numbers AWK518/3DNW123,
- 116) 1941 Ford Model T, VIN: TEX113799, Unknown License Number,
- 117) 1970 Plymouth Barracuda, VIN: BH23L0E101535, Unknown License Number,
- 118) 1966 Cadillac Coupe De Ville, VIN: J6200404, California License Number SFA651,
- 119) 1970 Plymouth Sport Satellite, VIN: RH27GOG109624, Unknown License Number,
- 120) 1966 Ford Fairlane, VIN: 6H46C103584, Unknown License Number,
- 121) 1968 Plymouth Roadrunner, VIN: RM23H8G269663, Unknown License Number,
- 122) 1968 Plymouth Roadrunner, VIN: RM21J8G176738, Unknown License Number,
- 123) 1968 Dodge Coronet, VIN: WM21J8G244328, Unknown License Number,
- 124) 1968 Plymouth Roadrunner, VIN: RM21H8E122344, Unknown License Number,
- 125) 1971 Chevrolet El Camino, VIN: 136801L154531, Unknown License Number,
- 126) 1967 Ford Mustang Supersnake, VIN: CSE67431F51SS058, Unknown License Number,
- 127) 1970 Plymouth Roadrunner, VIN: RM23H9G229326, Unknown License Number,

- 1 128) 1969 Dodge Daytona Superbird, VIN: XX29L9B410796, Unknown License
Number,
- 2 129) 1972 Oldsmobile Cutlass, VIN: 3G87H2M139607, Unknown License
Number,
- 3 130) 1965 Buick Skylark, VIN: 444275Z123947, Unknown License Number,
- 4 131) 1970 Chevrolet Chevelle, VIN: 136370R206402, Unknown License Number,
- 5 132) 1965 Ford Mustang Fastback, VIN: 5R09A135014, Unknown License
Number,
- 6 133) 1979 Pontiac Firebird Trans Am, VIN: 2X87Z9L158353, Unknown License
Number,
- 7 134) 1969 Chevrolet Camaro, VIN: 1G1FP31E1KL204902, Unknown License
Number,
- 8 135) 1962 Ford F-100, VIN: F10JK295453, Unknown License Number,
- 9 136) 1940 Cadillac Limousine, VIN: 3320188, Unknown License Number,
- 10 137) 1978 Jeep CJ-7, VIN: J8F93EH014818, Unknown License Number,
- 11 138) 1972 Dodge Truck, VIN: W14AE2S578707, Unknown License Number,
- 12 139) 1928 Ford Model A, VIN: MBPGSIN7725, Unknown License Number,
- 13 140) 1926 Ford Model T, VIN: OR17679942, Unknown License Number,
- 14 141) 1929 Ford, VIN: 1131945, Unknown License Number,
- 15 142) 1936 Ford Truck, VIN: 183242651, Unknown License Number,
- 16 143) 1950 Chevrolet Truck, VIN: CKL148Z152798, Unknown License Number,
- 17 144) 1969 Plymouth Roadrunner, VIN: RM23H9G283783, Unknown License
Number,
- 18 145) 1967 Ford Mustang Supersnake, VIN: TEX114250, Unknown License
Number,
- 19 146) 1970 Chevrolet Camaro, VIN: 124870L506468, Unknown License Number,
- 20 147) 1971 Plymouth Scamp, VIN: VH23G1R294584, Unknown License Number,
- 21 148) 2008 Maserati Granturismo, VIN: ZAMGJ45A380036731, Unknown
License Number,
- 22 149) 1967 Chevrolet Truck, VIN: CE147Z133816, California License Numbers
RSICK67/8D62591,
- 23 150) 1941 Plymouth Special Deluxe, VIN: 11142858, Unknown License Number,
- 24 151) 1955 Chevrolet Truck, VIN: H255L012288, Unknown License Number,
- 25 152) 1968 Chevrolet Chevelle, VIN: 136378K132288, Unknown License Number,
and
- 26 153) 1932 Ford Custom Roadster, VIN: 0R83925, Unknown License Number.

27 2. In December 2018, agents with the Federal Bureau of Investigation (“FBI”) executed
28 federal search and seizure warrants at the Carpoff’s residences and business in California and Las
29 Vegas, Nevada. In total, law enforcement seized more than 160 vehicles, boats, and motorcycles
30 from the Carpoffs, including the approximately 153 defendant vehicles identified above.

31 3. The United States Marshals Service (“USMS”), or their designee, shall sell the
32 defendant vehicles in the most commercially feasible manner, as soon as reasonably possible, for the
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1 maximum price. The sale shall be conducted by auction by the USMS or its contractor, Apple
2 Auctioneering Co., in a commercially reasonable manner. The USMS shall conduct a marketing and
3 advertising campaign to promote the sale of the defendant vehicles, followed by a public preview and
4 live auction. The live auction shall allow bidders to bid in person, online, or through a proxy, and
5 shall be simulcast on the Internet. The auction will further be simulcast live for prospective buyers
6 and their representatives. The USMS, in consultation with the U.S. Attorney's Office, may set a
7 reserve price for any or all of the defendant vehicles and will decide if that reserve price is publicly
8 disclosed. The USMS, in consultation with the U.S. Attorney's Office, will select the time and
9 location of the preview and auction, providing at least two weeks advance notice to potential bidders.
10 If any defendant vehicle does not achieve the reserve price, the USMS, in consultation with the U.S.
11 Attorney's Office, may refer any vehicles to a secondary auction procedure managed by the U.S.
12 Marshals or its contractors. The parties estimate the auction will be conducted approximately sixty
13 days from the date of this Order and will likely occur in Sacramento, California.

14 4. In furtherance of the interlocutory sale, Jeffrey Carpoﬀ and Paulette Carpoﬀ, without
15 waiving their rights under the Fifth Amendment to the United States Constitution, represent to the
16 United States that in so far as they can tell without possession of their records concerning the vehicles
17 no other person or entity holds an ownership interest in the assets which are the subject of this
18 stipulation. Jeffrey Carpoﬀ and Paulette Carpoﬀ agree to execute promptly any title or registration
19 documents that may be required to complete the interlocutory sale of the referenced defendant assets.

20 5. The net sales proceeds of the sale will include the funds realized from the sale after
21 payment of all seizure, storage, auction and sale costs, including, without limitation to, forfeiture
22 seizure and arrest costs, storage costs, transportation expenses, sales commissions, advertising
23 expenses and sales costs. The net proceeds of sale shall be deposited into the United States Marshals
24 Service's seized asset account pending further order of the Court.

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