

1 PHILLIP A. TALBERT  
 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.

2:24-MC-00402-DJC-SCR

*AMENDED* STIPULATION AND ORDER  
 EXTENDING TIME FOR FILING A  
 COMPLAINT FOR FORFEITURE AND/OR  
 TO OBTAIN AN INDICTMENT ALLEGING  
 FORFEITURE

14 APPROXIMATELY \$269,565.50 SEIZED FROM  
 FIRST RELIANCE BANCSHARES, INC.  
 15 ACCOUNT NUMBER 5220000969, HELD IN THE  
 NAME OF LIFESTYLE DEVELOPMENT, LLC,  
 16  
 APPROXIMATELY \$1,373.95 SEIZED FROM  
 17 VALLEY NATIONAL BANK ACCOUNT  
 NUMBER 8843534202, HELD IN THE NAME OF  
 18 LIFESTYLE DEVELOPMENT, LLC,  
 19 APPROXIMATELY \$7,982.56 SEIZED FROM  
 FIRST RELIANCE BANCSHARES, INC.  
 20 ACCOUNT NUMBER 5210000745, HELD IN THE  
 NAME OF THOMAS EIDE,  
 21  
 APPROXIMATELY \$50,000.00 SEIZED FROM  
 22 MAINSTREET BANK ACCOUNT NUMBER  
 2010039009, HELD IN THE NAME OF PRV  
 23 INTERNATIONAL, LLC,  
 24 APPROXIMATELY \$36,650.38 SEIZED FROM  
 BANK OF AMERICA, N.A. ACCOUNT NUMBER  
 25 383019458700, HELD IN THE NAME OF  
 VITAKEM NUTRA, AND  
 26  
 27  
 28

1 APPROXIMATELY \$37,886.31 SEIZED FROM  
2 SOUTHSTATE BANK, NA ACCOUNT NUMBER  
3 8010002012630, HELD IN THE NAME OF  
4 SARAH NICK,

5  
6 Defendants.

7 It is hereby stipulated by and between the United States of America and potential claimants  
8 Thomas Eide on behalf of himself and Lifestyle Development, LLC, by and through their respective  
9 counsel, Erick Reyes-Villa as representative for PRV International, LLC, and Bret Hoyt as representative  
10 for Vitakem Nutraceutical, Inc. (“claimants”), as follows:

11 1. On or about May 7, 2024, the U.S. Postal Inspection Service (“USPIS”) seized the above-  
12 referenced defendant funds<sup>1</sup> pursuant to Federal seizure warrants (hereafter collectively “defendant  
13 funds”).

14 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to  
15 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an  
16 indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of  
17 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That  
18 deadline was October 4, 2024.

19 3. By Stipulation and Order filed October 9, 2024, the parties stipulated to extend to January  
20 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
21 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

22 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April  
23 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
24 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

25 5. Accordingly, the parties agree that the deadline by which the United States shall be  
26 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
27

28 <sup>1</sup> The United States is no longer seeking forfeiture of the Approximately \$37,886.31 seized from Southstate Bank, NA account number 8010002012630, held in the name of Sarah Nick.

1 alleging that the defendant funds are subject to forfeiture shall be extended to April 2, 2025.

2 Dated: 12/30/2024

PHILLIP A. TALBERT  
United States Attorney

3  
4 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

5  
6 Dated: 12/30/2024

/s/ Daniel Olmos  
DANIEL OLMOS  
Attorney for potential claimant Thomas Eide on  
behalf of himself and Lifestyle Development, LLC  
600 University Avenue  
Palo Alto, CA 94301  
(Signature authorized by email)

7  
8  
9  
10 Dated: 1/2/2025

/s/ Erick Reyes-Villa  
ERICK REYES-VILLA  
Potential Claimant on behalf of  
PRV International, LLC  
Appearing *in propria persona*  
1055 Thomas Jefferson Street NW, Suite 620  
Washington, DC 20007  
(Signature authorized by email)

11  
12  
13  
14  
15 Dated: 12/30/2024

/s/ Bret Hoyt  
BRET HOYT  
Potential Claimant on behalf of  
Vitakem Neutraceuticals, Inc.  
Appearing *in propria persona*  
811 W. Jericho Turnpike  
Smithtown, NY 11787  
(Signature authorized by email)

16  
17  
18  
19  
20  
21 **IT IS SO ORDERED.**

22  
23 Dated: January 3, 2025

/s/ Daniel J. Calabretta  
THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE