

8	11/14/2011	GREGORY D. JEFFREYS, and SHANNON STILTNER	Email communication from SHANNON STILTNER to J.G., relating to the false and fraudulent venture identified as "Pro-Forma 11-01."
9	11/15/2011	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$100,000 from J.G. in Texas to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 11-01."
10	11/15/2011	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$100,000 from I.G. in Texas, via New York, to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 11-01."
11	11/28/2011	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$35,000 from C.Z. in California to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 11-02."
12	11/29/2011	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$25,000 from D.J.B. in Wisconsin to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 11-02."

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4	13	12/14/2011	GREGORY D. JEFFREYS, and SHANNON STILTNER
5			Wire transfer in the amount of \$100,000 from J.G. in Texas to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 11-02."
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9	14	1/10/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER
10			Wire transfer in the amount of \$75,000 from J.G. in Texas to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 11-02."
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14	15	1/24/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER
15			Wire transfer in the amount of \$205,000 from J.G. in Texas to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-02."
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19	16	1/25/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER
20			Wire transfer in the amount of \$100,000 from I.G. in Louisiana to Wells Fargo account xxxx-0146 the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-02."
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17	2/17/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$600,000 from J.G. in Louisiana to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Oyster Point Office Building, San Francisco, CA."
18	5/14/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$50,000 from S.F. in California to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-04."
19	6/6/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Email communication from SHANNON STILTNER to R.Y., relating to the false and fraudulent venture identified as "Pro-Forma 12-04."
20	6/7/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$100,000 from J.P.G. in Kansas to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-04."
21	6/14/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Email communication from GREGORY D. JEFFREYS to W.S., relating to the false and fraudulent venture identified as "Pro-Forma 12-04."

22	7/11/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$50,000 from E.A. in Florida to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-05."
23	7/11/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$40,000 from E.A. in Florida to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-05."
24	7/11/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$30,000 from L.S. in New York to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-05."
25	7/12/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$25,000 from S.L. in Oregon to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-05."

26	7/13/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$25,000 from D.W. in California to Wells Fargo account xxxx-0146 in the Eastern District of Washington, relating to the false and fraudulent venture identified as "Pro-Forma 12-05."
27	8/3/2012	GREGORY D. JEFFREYS	Email communication from GREGORY D. JEFFREYS to V.P., relating to the false and fraudulent venture identified as "Pro-Forma 12-25."
28	12/17/2012	GREGORY D. JEFFREYS	Email communication from GREGORY D. JEFFREYS to W.S., relating to the false and fraudulent venture identified as "Pro-Forma 12-14."
29	12/18/2012	GREGORY D. JEFFREYS	Email communication from GREGORY D. JEFFREYS to W.S., relating to the false and fraudulent venture identified as "Pro-Forma 12-14."

In violation of 18 U.S.C. §§ 1343 and 2.

COUNTS 30-73
MONEY LAUNDERING
(18 U.S.C. § 1957)

On or about the dates set forth below, in the Eastern District of Washington, and elsewhere, defendants GREGORY D. JEFFREYS, SHANNON STILTNER, and KIMBERLY JEFFREYS, specified as to each count below, did knowingly engage and attempt to engage in the following monetary transactions by, through, and to a financial institution, affecting interstate or foreign commerce, involving criminally derived property of a value greater than \$10,000, and such property

INDICTMENT - 38

having been derived from a specified unlawful activity, that is wire fraud, in violation of 18 United States Code, Section 1343. The allegations made in this paragraph are repeated and re-alleged in each of the following Counts 30 through 73 of this Indictment, as though fully set forth therein:

30	11/15/2011	GREGORY D. JEFFREYS	Transfer in the amount of \$50,000, from Wells Fargo account xxxx-0146, to Wells Fargo account xxxx-5332 owned by J.J.
31	11/15/2011	GREGORY D. JEFFREYS	Purchase of cashier's check in the amount of \$45,000, from Wells Fargo account xxxx-0146, payable to Mandalay Bay Hotel & Casino in Las Vegas, NV.
32	11/15/2011	GREGORY D. JEFFREYS	Transfer in the amount of \$80,000, from Wells Fargo account xxxx-0146, to Wells Fargo account xxxx-5035 owned by GREGORY D. JEFFREYS and KIMBERLY JEFFREYS.
33	11/16/2011	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$10,900 to Sterling Savings Bank, from Wells Fargo account xxxx-5035 via check #5077, relating to a personal mortgage payment for 5312 N. Vista, Spokane, WA.

34	11/16/2011	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$10,900 to Sterling Savings Bank, from Wells Fargo account xxxx-5035 via check #5078, relating to a personal mortgage for 5312 N. Vista, Spokane, WA.
35	11/16/2011	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$11,250 to Tech Rock LLC, from Wells Fargo account xxxx-5035 via check #5074, relating to a personal Riverbank loan.
36	11/21/2011	GREGORY D. JEFFREYS, and SHANNON STILTNER	Purchase of cashier's check in the amount of \$10,000, from Wells Fargo account xxxx-0146, payable to M.U.
37	11/29/2011	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$10,843.22 to Sterling Savings Bank, from Wells Fargo account xxxx-5035 via check #5096, relating to a personal mortgage for 5312 N. Vista, Spokane, WA.
38	12/2/2011	GREGORY D. JEFFREYS	Wire transfer in the amount of \$70,000, from Wells Fargo account xxxx-0146, to a Bank of New York account relating to a personal loan.
39	12/6/2011	GREGORY D. JEFFREYS	Transfer in the amount of \$21,500, from Wells Fargo account xxxx-0146, to Wells Fargo account xxxx-5035.

40	12/6/2011	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$21,600 to Sundevil LLC, from Wells Fargo account xxxx-5035 via check #5099, relating to a personal Riverbank loan.
41	12/14/2011	GREGORY D. JEFFREYS	Transfer in the amount of \$82,000, from Wells Fargo account xxxx-0146, to Wells Fargo account xxxx-5035.
42	12/12/2011	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$61,250 to Tech Rock LLC, from Wells Fargo account xxxx-5035 via check #5100, relating to a personal Riverbank loan.
43	12/15/2011	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$10,800 to Sterling Savings Bank, from Wells Fargo account xxxx-5035 via check #5102, relating to a personal mortgage for 5312 N. Vista, Spokane, WA.
44	1/10/2012	GREGORY D. JEFFREYS	Purchase of cashier's check in the amount of \$50,000, from Wells Fargo account xxxx-0146, payable to Mandalay Bay Hotel & Casino in Las Vegas, NV.
45	1/24/2012	GREGORY D. JEFFREYS	Transfer in the amount of \$205,000, from Wells Fargo account xxxx-0146, to Wells Fargo account xxxx-5035.
46	1/25/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Wire transfer in the amount of \$195,000, from Wells Fargo account xxxx-5035, to Sterling Saving account xxxx-4787.

47	1/26/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$195,000 to Riverbank, from Sterling Saving account xxxx-4787 via check #7916, relating to a personal loan.
48	1/26/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$10,500 to Tech Rock LLC, from Wells Fargo account xxxx-5035 via check #5129, relating to a personal Riverbank loan.
49	1/25/2012	GREGORY D. JEFFREYS	Purchase of cashier's check in the amount of \$20,000, from Wells Fargo account xxxx-0146, payable to C.T.
50	1/25/2012	GREGORY D. JEFFREYS	Purchase of cashier's check in the amount of \$60,000, from Wells Fargo account xxxx-0146, payable to M.A.
51	2/17/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Purchase of cashier's check in the amount of \$75,000, from Wells Fargo account xxxx-0146, payable to Mandalay Bay Hotel & Casino in Las Vegas, NV.
52	2/17/2012	GREGORY D. JEFFREYS	Transfer in the amount of \$220,000, from Wells Fargo account xxxx-0146, to Wells Fargo account xxxx-5035.
53	2/17/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Wire transfer in the amount of \$128,000 from Wells Fargo account xxxx-5035, to a Service First Bank of Nevada account, relating to the purchase of 26218 South Buttonwood Drive, Sun Lakes, AZ.

54	2/21/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$18,000 to Sundevil LLC, from Wells Fargo account xxxx-5035 via check #5146.
55	2/23/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Transfer in the amount of \$24,900, from Wells Fargo account xxxx-05035, to Wells Fargo account xxxx-6399.
56	2/28/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$32,500 to KIMBERLY JEFFREYS, from Wells Fargo account xxxx-5035 via check #5147.
57	2/21/2012	GREGORY D. JEFFREYS	Wire transfer in the amount of \$250,000, from Wells Fargo account xxxx-0146, to an American West Bank account, relating to a personal loan payment.
58	3/1/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Wire transfer in the amount of \$50,000, from Wells Fargo account xxxx-0146, to a U.S. Bank account, relating to the purchase of 2116 Orchard Mist, Las Vegas, NV.
59	3/29/2012	GREGORY D. JEFFREYS	Purchase of cashier's check in the amount of \$30,000, from Wells Fargo account xxxx-0146, payable to Mandalay Bay Hotel & Casino, Las Vegas, NV.
60	4/18/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Attempted payment of approximately \$19,740.60 to J.G., from Wells Fargo account xxxx-0146 via check #5056.

61	5/8/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Purchase of cashier's check in the amount of \$50,000, from Wells Fargo account xxxx-0146, payable to Mandalay Bay Hotel & Casino, Las Vegas, NV.
62	5/11/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Purchase of cashier's check in the amount of \$45,500, from Wells Fargo account xxxx-0146, payable to Mandalay Bay Hotel & Casino in Las Vegas, NV.
63	5/15/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Purchase of cashier's check in the amount of \$58,408, from Wells Fargo account xxxx-0146, payable to G.S.
64	6/7/2012	GREGORY D. JEFFREYS	Transfer in the amount of \$40,000, from Wells Fargo account xxxx-0146, to Wells Fargo account xxxx-5035.
65	6/6/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$11,200 to KIMBERLY JEFFREYS, from Wells Fargo account xxxx-5035 via check #5229.
66	6/8/2012	GREGORY D. JEFFREYS	Wire transfer in the amount of \$12,714.22, from Wells Fargo account xxxx-5035, to a First American Trust Bank account relating to the purchase of 502 W. 1 st Ave, #5, Spokane, WA, and 514 W. 1 st Ave, #3, Spokane, WA.

67	6/7/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Wire transfer in the amount of \$49,000, from Wells Fargo account xxxx-0146, to Bank of America account xxxx-5725 owned by Ocotillo K LLC.
68	6/8/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Wire transfer in the amount of \$46,979.59, from Bank of America account xxxx-5725, to a First American Trust Bank account, relating to a payment for Urban Sound Properties LLC and Sound Crest LLC.
69	7/11/2012	GREGORY D. JEFFREYS	Transfer in the amount of \$70,000, from Wells Fargo account xxxx-0146, to Wells Fargo account xxxx-5035.
70	7/11/2012	GREGORY D. JEFFREYS, and KIMBERLY JEFFREYS	Payment of approximately \$57,000 to KIMBERLY JEFFREYS, from Wells Fargo account xxxx-5035 via check #5243.
71	7/13/2012	GREGORY D. JEFFREYS, KIMBERLY JEFFREYS, and SHANNON STILTNER	Payment of approximately \$18,383.12 to American Express, from Wells Fargo account xxxx-5035, relating to the purchase of 2006 Cadillac Escalade VIN #1GYEC63N66R151835.
72	7/13/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Purchase of cashier's check in the amount of \$50,000, from Wells Fargo account xxxx-0146, payable to Mandalay Bay Hotel & Casino, Las Vegas, NV.

73	7/19/2012	GREGORY D. JEFFREYS, and SHANNON STILTNER	Purchase of cashier's check in the amount of \$25,000, from Wells Fargo account xxxx-0146, payable to Fidelity National Title Agency of Nevada relating to the purchase of 2368 Villandry Court, Henderson, NV.

All in violation of Title 18, United States Code, Section 1957 and 2.

NOTICE OF FORFEITURE ALLEGATIONS

Conspiracy to Commit Bank Fraud and Wire Fraud

The allegations contained in Counts 1-5 of the Indictment are hereby realleged and incorporated herein by this reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); and 18 U.S.C. § 982(a)(2).

Upon conviction of any of the offenses in violation of 18 U.S.C. § 1349 (Conspiracy to Commit Bank Fraud and Wire Fraud), as set forth in Count 1, and 18 U.S.C. § 1344(1) and (2) (Bank Fraud), as set forth in Counts 2-5, the Defendants GREGORY D. JEFFREYS and KIMBERLY JEFFREYS shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(a)(2), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following:

MONEY JUDGMENT

A sum of money equal to \$1,400,730.15 in United States currency, representing the amount of proceeds obtained as a result of the conspiracy to commit bank fraud and wire fraud offenses for which the Defendants, GREGORY D. JEFFREYS and KIMBERLY JEFFREYS, are jointly and severally liable.

1 If any of the property described above, as a result of any act or omission of
2 any of the Defendants:

- 3 (a) cannot be located upon the exercise of due diligence;
4 (b) has been transferred or sold to, or deposited with, a third party;
5 (c) has been placed beyond the jurisdiction of the court;
6 (d) has been substantially diminished in value; or
7 (e) has been commingled with other property which cannot be divided
8 without difficulty;

9 the United States of America shall be entitled to forfeiture of substitute property
10 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

11 All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

12 Theft of Government Funds

13 The allegations contained in Count 6 of the Indictment are hereby realleged
14 and incorporated herein by this reference for the purpose of alleging forfeitures
15 pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

16 Upon conviction of the offense in violation of 18 U.S.C. § 641 (Theft of
17 Government Funds), as set forth in Count 6, the Defendants GREGORY D.
18 JEFFREYS and KIMBERLY JEFFREYS shall forfeit to the United States of
19 America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any
20 property, real or personal, which constitutes or is derived from proceeds traceable
21 to the offense. The property to be forfeited includes, but is not limited to, the
22 following:

23 MONEY JUDGMENT

24 A sum of money equal to \$1,400,730.15 in United States currency,
25 representing the amount of proceeds obtained as a result of the theft of
26 government funds offense for which the Defendants, GREGORY D.
JEFFREYS and KIMBERLY JEFFREYS, are jointly and severally liable.

27 If any of the property described above, as a result of any act or omission of
28 any of the Defendants:

- 1 (a) cannot be located upon the exercise of due diligence;
- 2 (b) has been transferred or sold to, or deposited with, a third party;
- 3 (c) has been placed beyond the jurisdiction of the court;
- 4 (d) has been substantially diminished in value; or
- 5 (e) has been commingled with other property which cannot be divided
- 6 without difficulty;

7 the United States of America shall be entitled to forfeiture of substitute property
8 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

9 All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

10 Conspiracy to Commit Wire Fraud and Wire Fraud

11 The allegations contained in Counts 7-29 of the Indictment are hereby
12 realleged and incorporated herein by this reference for the purpose of alleging
13 forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); and, 18
14 U.S.C. § 982(a)(2).

15 Upon conviction of any of the offenses in violation of 18 U.S.C. § 1349
16 (Conspiracy to Commit Wire Fraud), as set forth in Count 7, and 18 U.S.C. § 1343
17 (Wire Fraud), as set forth in Counts 8-29, the Defendants GREGORY D.
18 JEFFREYS and SHANNON STILTNER shall forfeit to the United States of
19 America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) and 18
20 U.S.C. § 982(a)(2), any property, real or personal, which constitutes or is derived
21 from proceeds traceable to the offenses. The property to be forfeited includes, but
22 is not limited to, the following:

23 MONEY JUDGMENT

24 A sum of money equal to \$2,062,489.00 in United States currency,
25 representing the amount of proceeds obtained as a result of the
26 conspiracy to commit wire fraud and wire fraud offenses for which
the Defendants, GREGORY D. JEFFREYS and SHANNON
STILTNER, are jointly and severally liable.

27 Upon conviction of any of the offenses set forth in Counts 7, 9, 10, 17, and
28 22-26, the Defendants GREGORY D. JEFFREYS and SHANNON STILTNER

1 shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C)
2 and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is
3 derived from proceeds traceable to the offenses. The property to be forfeited
4 includes, but is not limited to, the following:

5 CONVEYANCES

6 2006 Cadillac Escalade, Nevada License Plate: LVA4J5, VIN:
7 1GYEC63N66R151835

8 U.S. FUNDS

9 -\$55,072.29 U.S. funds seized by FBI pursuant to a seizure warrant,
10 on or about July 24, 2012, from Wells Fargo Bank Checking and
11 Savings Account #: XXXXXX70146, held in the name of Shannon L.
12 Stiltner and Gregory D. Jeffreys.

13 -\$50,000.00 of the \$75,000.00 U.S. funds seized by FBI, pursuant to a
14 seizure warrant, on or about August 16, 2012, from RiverBank
15 Consumer Money Market Account XXXXXX1971, held in the name
16 of Jonathon J. Jeffreys.

17 REAL PROPERTY

18 26218 South Buttonwood Drive, Sun Lakes, Arizona, legally
19 described as follows:

20 Lot 101, Sun Lakes Unit Twenty-Four, according to Book 293 of
21 Maps, Page 7, records of Maricopa County, Arizona.

22 Except all oil, gas, minerals and rights thereto.

23 TOGETHER WITH all appurtenances, fixtures, attachments, and
24 improvements thereto and thereupon,

25 SUBJECT TO covenants, conditions, restrictions, reservations,
26 easements and agreements of record, if any.

27 If any of the property described above, as a result of any act or omission of
28 any of the Defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided

1 without difficulty;
2 the United States of America shall be entitled to forfeiture of substitute property
3 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

4 All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

5 Money Laundering

6 The allegations contained in Counts 30, 53, 69, and 71 of the Indictment are
7 hereby realleged and incorporated herein by this reference for the purpose of
8 alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).

9 Upon conviction any of the offenses in violation of 18 U.S.C. § 1957
10 (Money Laundering), as set forth in Counts 30, 53, 69, and 71, the Defendants
11 GREGORY D. JEFFREYS, KIMBERLY JEFFREYS, and SHANNON
12 STILTNER shall forfeit to the United States of America, pursuant to 18 U.S.C. §
13 982(a)(1), any property, real or personal, involved in such offenses, and any
14 property traceable to such property. The property to be forfeited includes, but is
15 not limited to, the following:

16 CONVEYANCES

17 2006 Cadillac Escalade, Nevada License Plate: LVA4J5, VIN:
18 1GYEC63N66R151835.

19 U.S. FUNDS

20 \$50,000.00 of the \$75,000.00 U.S. funds seized by FBI, pursuant to a
21 seizure warrant, on or about August 16, 2012, from RiverBank
22 Consumer Money Market Account XXXXXX1971, held in the name
23 of Jonathon J. Jeffreys.

24 REAL PROPERTY

25 26218 South Buttonwood Drive, Sun Lakes, Arizona, legally
26 described as follows:

27 Lot 101, Sun Lakes Unit Twenty-Four, according to Book 293 of
28 Maps, Page 7, records of Maricopa County, Arizona.

Except all oil, gas, minerals and rights thereto.

TOGETHER WITH all appurtenances, fixtures, attachments, and

1 improvements thereto and thereupon,

2 SUBJECT TO covenants, conditions, restrictions, reservations,
3 easements and agreements of record, if any.

4 If any of the property described above, as a result of any act or omission of
5 any of the Defendants:

6 (a) cannot be located upon the exercise of due diligence;

7 (b) has been transferred or sold to, or deposited with, a third party;

8 (c) has been placed beyond the jurisdiction of the court;

9 (d) has been substantially diminished in value; or

10 (e) has been commingled with other property which cannot be divided
11 without difficulty;

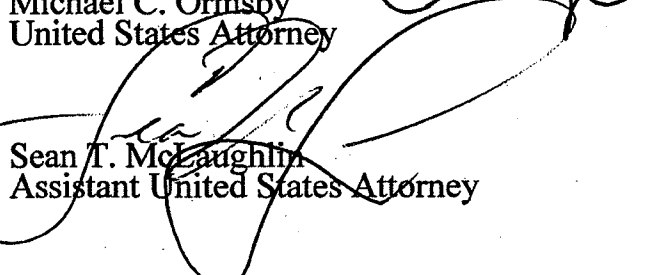
12 the United States of America shall be entitled to forfeiture of substitute property
13 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28
14 U.S.C. § 2461(c).

15
16 DATED this 23rd day of January, 2013.

17 A TRUE BILL

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20 

21 Michael C. Ormsby
22 United States Attorney

23 
24 Sean T. McLaughlin
25 Assistant United States Attorney