

STIPULATION REGARDING SALE OF REAL PROPERTY

It is hereby stipulated by and between the United States of America,
and Casey David Crowther (the Defendant), by and through their respective
attorneys, as follows:

1. That the parties do hereby agree to the sale of the property
described more fully below, in order to preserve the Government's interest, if
any, in the subject property and preserve whatever rights and remedies the
Defendant may have in the property, upon the terms indicated below.

2. The property that is the subject of this agreement is:

Address: 3653 San Carlos Drive, Saint James City, Florida

Legal: Lot 19, Block F, of that certain subdivision known as
Bayview Acres, according to the map or plat thereof
on file and recorded in the office of the Clerk of the
Circuit Court of Lee County, Florida, in Plat Book
11, at Pages 100 and 101.

Parcel ID: 02-46-22-11-0000F.0190.

(the Real Property).

3. The Defendant was charged in a superseding indictment with
various offenses, including, but not limited to, bank fraud and illegal monetary
transactions in *United States v. Casey David Crowther*, Case No. 2:20-cr-114-FtM-
66MRM (the criminal case). The superseding indictment also contained

forfeiture allegations putting the defendant on notice that the United States would seek the forfeiture of, among other things, the Real Property.

4. On October 30, 2020, to preserve its interest in the Real Property, the United States filed a Notice of Lis Pendens in the criminal case, which was recorded in the Public Records of Lee County, Florida, Instrument Number 2020000266977 (the Lis Pendens).

5. The Defendant, as titled owner, has obtained an offer to purchase the Real Property on terms and conditions that are acceptable to both parties. The parties agree that it is in all parties' best interest to allow the pending sale of the Real Property to proceed as scheduled, and further agree that the net proceeds from the sale be deposited into the Treasury Suspense Account and preserved as substitute *res* pending the outcome of the criminal case.

6. At closing, the parties agree that all mortgages and liens shall be paid in accordance with their lien priority. The parties further agree that, after payment of all usual and customary closing costs associated with the sale, the net proceeds obtained from the sale shall be wired to the Treasury Suspense Account and maintained pending resolution and entry of a Final Order of Forfeiture of the net proceeds obtained from the sale of the Real Property in lieu of forfeiting the Real Property itself. In the event is determined that the United

States is not entitled to forfeit the net proceeds in lieu of the Real Property, the United States will return them as directed by the Defendant.

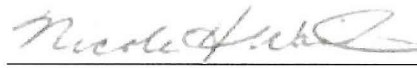
7. Upon receipt of confirmation that the net proceeds from the sale of the Real Property have been transferred to the Treasury Suspense Account, the United States will promptly file a Release of Lis Pendens in the criminal case, and will provide the closing agent with a certified copy of the Release of Lis Pendens as well as a Disclaimer of Interest for the real property located at 3617 San Carlos Drive, Saint James City, Florida, which was not identified as subject to forfeiture in the criminal case. The closing agent will be responsible for recording the Release of Lis Pendens and Disclaimer of Interest.

8. The United States further agrees that, upon receipt of the net proceeds from the sale of the Real Property, it will file a Bill of Particulars in the criminal case, notifying the Court that it seeks the forfeiture of the net proceeds obtained from the sale of the Real Property in lieu of the Real Property.

9. The parties agree to execute further documents, to the extent necessary, to sell the Real Property under the terms of this agreement and to further implement the terms of this agreement.

Counsel for Casey David Crowther

November 18, 2020
Date



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11/19/2020
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