The Hon. John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA, Plaintiff, v. ERIC SHIBLEY, Defendant.	NO. CR20-174-JCC **FORFEITURE BILL OF PARTICULARS**

The United States, by and through its undersigned counsel, submits this Forfeiture Bill of Particulars pursuant to Federal Rule of Criminal Procedure 32.2(a).

1. As alleged in the Indictment, the United States is seeking the forfeiture of property in this case. Dkt. No. 31.

2. The United States hereby provides the following bill of particulars related to the forfeiture allegations contained in the Indictment, and alleges that:

A. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) by way of Title 28, United States Code, Section 2461(c), upon conviction of the *Wire Fraud* offenses charged in Counts 1–7 of the Indictment, and pursuant to Title 18, United States Code, Section 982(a)(2), upon conviction of the *Bank Fraud* offenses charged in Counts 8–10 of the Indictment, Defendant ERIC SHIBLEY shall forfeit to the United States any property constituting,

UNITED STATES ATTORNEY
700 STEWART STREET. SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

or traceable to, proceeds the Defendant obtained, directly or indirectly, as a result of such offenses; and

B. Pursuant to Title 18, United States Code, Section 982(a)(1), that upon conviction of the *Money Laundering* offenses changed in Counts 11–15 of the Indictment, Defendant ERIC SHIBLEY shall forfeit to the United States any property involved in, or traceable to, such offenses.

This property includes, but is not limited to, the following:

A. $49,500.86 in U.S. funds, seized on or about May 29, 2020 from Navy Federal Credit Union account #******7528, held in the name of Eric R. Shibley MD PLLC;

B. $100,000.00 in U.S. funds, seized on or about May 29, 2020 from Wells Fargo account #******2378, held in the name of ES1 LLC;

C. $804,816.63 in U.S. funds, seized on or about May 27, 2020 from Wells Fargo account #******3536, held in the name of The A Team Holdings LLC;

D. $114,440.00 in U.S. funds, seized on or about June 30, 2020 from Verity Credit Union account #***5390, held in the name of Dituri Construction LLC; and

E. $114,743.59 in U.S. funds, seized on or about June 30, 2020 from Verity Credit Union account #***5320, held in the name of SS1 LLC.

UNITED STATES ATTORNEY
700 STEWART STREET. SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

DATED this 26th day of October, 2020.

Respectfully submitted,

BRIAN T. MORAN
United States Attorney

s/Krista K. Bush
KRISTA K. BUSH
Assistant United States Attorney
700 Stewart Street, Suite 5220
Seattle, WA 98101-1271
Telephone: (206) 553-2242
E-mail: krista.bush@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which automatically serves the parties of record.

s/Hannah G. Williams
HANNAH G. WILLIAMS
FSA Paralegal II, Contractor
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101
(206) 553-2242
Hannah.Williams2@usdoj.gov