

The Honorable 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. CR20-174JCC

**GOVERNMENT'S AMENDED EXHIBIT
LIST**

The United States of America, by and through Nicholas W. Brown, United States Attorney for the Western District of Washington, Brian Werner, Assistant United States Attorney for the Western District of Washington, Joseph Beemsterboer, Acting Chief, Fraud Section, Department of Justice, and Laura Connelly, Trial Attorney, submits the following amended list of exhibits. The government reserves the right to add additional exhibits and may file an amended list of exhibits.

Exhibit No.	Exhibit
1	PPP Loan Documents for The A Team Holdings LLC to Ready Capital / Customers Bank
2	PPP Loan Documents for Seattle's Finest Cannabis LLC to TCF Bank
3	PPP Loan Documents for Dituri Construction LLC to Ready Capital / Customers Bank
4	PPP Loan Documents for Dituri Construction LLC to Celtic Bank
5	PPP Loan Documents for SS1 LLC to Harvest Small Business Finance
6	PPP Loan Documents for Eric R Shibley MD PLLC to BECU
7	PPP Loan Documents for ES1 LLC to BECU
8	PPP Loan Documents for Eric R Shibley MD PLLC to FundBox
9	PPP Loan Documents for Dituri Construction LLC to FundBox
10	PPP Loan Documents for SS1 LLC to FundBox
11	PPP Loan Documents for Eric R Shibley MD PLLC to Ready Capital / Customers Bank
12	PPP Loan Documents for ES1 LLC to Ready Capital / Customers Bank
13	PPP Loan Documents for SS1 LLC to Ready Capital / Customers Bank
14	PPP Loan Documents for SFC LLC to Ready Capital / Customers Bank
15	PPP Loan Documents for Eric R Shibley MD PLLC to Harvest Small Business Finance
16	PPP Loan Documents for ES1 LLC to Harvest Small Business Finance
17	PPP Loan Documents for Dituri Construction LLC to Idaho Central Credit Union
18	PPP Loan Documents for ES1 LLC to Idaho Central Credit Union
19	PPP Loan Documents for Eric R Shibley MD PLLC to Idaho Central Credit Union
20	PPP Loan Documents for SS1 LLC to Idaho Central Credit Union
21	PPP Loan Documents for SFC LLC to Idaho Central Credit Union
22	PPP Loan Documents for ES1 LLC to TCF Bank
23	PPP Loan Documents for Eric R Shibley MD PLLC to TCF Bank
24	PPP Loan Documents for SFC LLC to Umpqua Bank
25	PPP Loan Documents for ES1 LLC to Wells Fargo Bank
26	PPP Loan Documents for Eric R Shibley MD PLLC to Wells Fargo Bank
27	EIDL Documents for Dituri Construction LLC
28	EIDL Documents for SS1 LLC
29	EIDL Documents for SFC LLC
30	EIDL Documents for SFC LLC
31	EIDL Documents for Seattle's Finest Cannabis
32	EIDL Documents for ES1 LLC

1	33	EIDL Documents for ES1 LLC
2	34	EIDL Documents for Shibley Medical
3	35	EIDL Documents for Eric Shibley (sole proprietorship)
4	36	EIDL Documents for Eric Shibley (sole proprietorship)
5	37	EIDL Documents for SS1 LLC
6	38	EIDL Documents for Dituri Construction LLC
7	39	EIDL Documents for The A Team Holdings LLC
8	40	Blank PPP Loan Application Form
9	41	5/27/20 Undercover Call with Celtic Bank
10	42	Transcription of 5/27/20 Celtic Bank Undercover Call
11	43	5/28/20 Undercover Call with Harvest (IRS UC)
12	44	Transcription of 5/28/20 Harvest Undercover Call
13	45	5/27/20 Shibley Voicemail to Harvest Bank
14	46	5/5/20 Email between Shibley to Harvest
15	47	5/27/20 Email between Shibley and Harvest
16	48	6/1/20 Email between Shibley and Harvest
17	49	4/30/20 Email between Shibley and Celtic
18	50	6/18/20 Email between Shibley and Celtic
19	51	5/27/20 Email between Shibley and Ready Capital
20	52	6/1/20 Email between Shibley and Ready Capital
21	53	4/25/20 Email between Shibley and BECU
22	54	5/4/20 Email between Shibley and ICCU
23	55	Reserved
24	56	Reserved
25	57	Reserved
26	58	Reserved
27	59	12/30/19 Washington Medical Commission Ex Parte Order regarding Eric Shibley
28	60	IRS Fact of Filing Letters
	61	IRS Lack of Certification Records
	62	Comcast IP Address Records for 73.109.30.232 and 2603:3023:31a:1000:99dd:8357:854d:a527 and 2603:3023:31a:1000:c9d5:5054:bc9:5cf0
	63	Google Subscriber Information for ers98126@gmail.com
	64	Google Subscriber Information for shibley98126@gmail.com
	65	Google Subscriber Information for shibley98271@gmail.com
	66	Yahoo Subscriber Information for shibleenyc@yahoo.com
	67	Microsoft Subscriber Information for shibleymedical@outlook.com
	68	T-Mobile Subscriber Information for phone number ending in 7868
	69	Comcast Subscriber Information and Call List for phone number ending in 4291

1	70	Washington Secretary of State (“WA SOS”) records for Dituri Construction LLC
2	71	WA SOS records for Eric R Shibley MD PLLC
3	72	WA SOS records for SS1 LLC
4	73	WA SOS records for ES1 LLC
5	74	WA SOS records for SFC LLC
6	75	WA SOS records for The A Team Holdings LLC
7	76	Washington Department of Revenue (“WA DOR”) letter of no records for Dituri Construction LLC, The A Team Holdings LLC, and SS1 LLC
8	77	WA DOR records for Eric R Shibley MD PLLC
9	78	WA DOR records for ES1 LLC
10	79	WA DOR records for SFC LLC
11	80	Washington Employment Security Department (“WA ESD”) letter of no records for Dituri Construction LLC
12	81	WA ESD records for Eric R Shibley MD PLLC
13	82	WA ESD letter of no records for SS1 LLC
14	83	WA ESD letter of no records for ES1
15	84	WA ESD letter of no records for SFC LLC
16	85	WA ESD letter of no records for The A Team Holdings LLC
17	86	WA ESD letter of no records for EIN ending in 8805
18	87	WA ESD records for Eric Shibley
19	88	WA ESD Records for S. Butler-Hem
20	89	WA ESD Records for C. Lopez
21	90	WA ESD Records for S. Morgan
22	91	WA ESD Records for J. Muna
23	92	WA ESD records for E. Pula
24	93	WA ESD records for R. Reel
25	94	WA ESD records for D. Sandoval
26	95	WA ESD records for R. Smith
27	96	WA ESD records for M. Tela
28	97	WA ESD records for L. Velotta
	98	WA ESD Urgent Data Request for ES1
	99	Skagit County Rules of Probation regarding Eric Shibley
	100	Picture of Shibley Medical
	101	Judgment in Anacortes Municipal Court Case # AC17582
	102	Washington State Department of Health – Shibley Credential Verification
	103	S. Morgan Death Certificate
	104	May 2020 Wells Fargo Statement for A Team Holdings LLC checking account ending in 9116

1	105	May 2020 Wells Fargo Statement for A Team Holdings LLC savings account ending in 3536
2	106	May 2020 BECU Statement for Dituri Construction LLC savings and checking accounts
3	107	May 2020 BECU Statement for SS1 LLC savings and checking accounts
4	108	5/26/20 Photo from Wells Fargo
5	109	Cashier's Check Image for Check No. 122356 for \$20,000 payable to Eric Shibley from Verity Credit Union
6	110	June 2020 NFCU Statement for ES1 LLC savings account ending in 4507
7	111	6/24/20 Letter from NFCU to ES1 LLC
8	112	5/13/20 BECU Large Cash Request for Dituri Construction
9	113	Commencement Bank records for Dituri Construction LLC Account ending in 2489
10	114	Signature Card for Commencement Bank Account in the name of Dituri Construction LLC ending in 2489
11	115	Verity Credit Union records for Dituri Construction LLC Account ending in 5380
12	116	Verity Credit Union records for Dituri Construction LLC Account ending in 5390
13	117	Verity Credit Union records for Dituri Construction LLC Account ending in 5400
14	118	Signature Card for Verity Credit Union Accounts in the name of Dituri Construction LLC ending in 5380, 5390, and 5400
15	119	BECU records for Dituri Construction LLC Account ending in 7219
16	120	BECU records for Dituri Construction LLC Account ending in 7277
17	121	Signature Card for BECU Accounts in the name of Dituri Construction LLC ending in -7219, -7277
18	122	BECU records for Eric R Shibley MD PLLC Account ending in 1495
19	123	BECU records for Eric R Shibley MD PLLC Account ending in 1536
20	124	Signature Card for BECU Accounts in the name of Eric R Shibley MD PLLC ending in 1495 and 1536
21	125	US Bank records for Eric R Shibley MD PLLC Account ending in 1766
22	126	Signature Card for US Bank Account in the name of Eric R Shibley MD PLLC ending in 1766
23	127	US Bank records for Eric R Shibley MD PLLC Account ending in 1782
24	128	Signature Card for US Bank Account in the name of Eric R Shibley MD PLLC ending in 1782
25	129	NFCU records for Eric R Shibley MD PLLC Account ending in 7528
26	130	NFCU records for Eric R Shibley MD PLLC Account ending in 9972

1	131	Signature Card for NFCU Accounts in the name of Eric R Shibley MD PLLC ending in 7528 and 9972
2	132	NFCU records for Eric R Shibley MD PLLC Account ending in 7721
3	133	BECU records for Eric R Shibley MD PLLC Account ending in 8158
4	134	Signature Card for BECU Account in the name of Eric R Shibley MD PLLC ending in 8158
5	135	Wells Fargo records for Eric R Shibley MD PLLC Account ending in 7247
6	136	Wells Fargo records for Eric R Shibley MD PLLC Account ending in 7262
7	137	Signature Card for Wells Fargo Accounts in the name of Eric R Shibley MD PLLC ending in 7247 and 7262
8	138	USAA records for Eric Shibley Account ending in 4985
9	139	Signature Card for USAA Account in the name of Eric Shibley ending in 4985
10	140	Home Street records for ES1 LLC Account ending in 2055
11	141	Signature Card for Home Street Account in the name of ES1 LLC ending in 2055
12	142	Wells Fargo records for ES1 LLC Account ending in 2378
13	143	Wells Fargo records for ES1 LLC Account ending in 9124
14	144	Signature Card for Wells Fargo Accounts in the name of ES1 LLC ending in 9124 and 2378
15	145	NFCU records for ES1 LLC Account ending in 4690
16	146	NFCU records for ES1 LLC Account ending in 2997
17	147	Signature Card for NFCU Accounts in the name of ES1 LLC ending in 4690 2997
18	148	Home Street records for ES1 LLC Account ending in 3109
19	149	Signature Card for Home Street Account in the name of ES1 LLC ending in 3109
20	150	NFCU records for ES1 LLC Account ending in 4507
21	151	NFCU records for ES1 LLC Account ending in 7053
22	152	BECU records for ES1 LLC Account ending in 7978
23	153	Signature Card for BECU Account in the name of ES1 LLC ending in 7978
24	154	US Bank records for ES1 LLC Account ending in 8383
25	155	BECU records for ES1 LLC Account ending in 9952
26	156	BECU records for ES1 LLC Account ending in 9960
27	157	Signature Card for BECU Accounts in the name of ES1 LLC ending in 9952 and 9960
28	158	Washington Federal records for ES1 LLC Account ending in 3113
	159	Washington Federal records for ES1 LLC Account ending in 3162
	160	Signature Card for Washington Federal Accounts in the name of ES1 LLC ending in 3113 and 3162
	161	BECU records for SFC LLC Account ending in 2911

1	162	BECU records for SFC LLC Account ending in 2945
2	163	Signature Card for BECU Accounts in the name of SFC LLC ending in 2945 and 2911
3	164	TAB Bank records for SFC LLC Account ending in 3104
4	165	Washington Federal records for SFC LLC Account ending in 1349
5	166	Washington Federal records for SFC LLC Account ending in 1422
6	167	Signature Card for Washington Federal Accounts in the name of SFC, LLC ending in 1349 and 1422
7	168	Home Street records for Shibley Medical Account ending in 7322
8	169	Signature Card for Home Street Account in the name of Shibley Medical ending in 7322
9	170	Home Street records for Shibley Medical Account ending in 8490
10	171	BECU records for SS1 LLC Account ending in 9683
11	172	BECU records for SS1 LLC Account ending in 9724
12	173	Signature Card for BECU Accounts in the name of SS1 LLC ending in 9724 and 9683
13	174	Commencement Bank records for SS1 LLC Account ending in 2513
14	175	Signature Card for Commencement Bank Account in the name of SS1 LLC ending in 2513
15	176	Verity Credit Union records for SS1 LLC Account ending in 5310
16	177	Verity Credit Union records for SS1 LLC Account ending in 5320
17	178	Verity Credit Union records for SS1 LLC Account ending in 5330
18	179	Signature Card for Verity Credit Union Accounts in the name of SS1 LLC ending in 5310, 5320, and 5330
19	180	Washington Federal records for The A Team Holdings LLC Account ending in 2958
20	181	Washington Federal records for The A Team Holdings LLC Account ending in 3006
21	182	Signature Card for Washington Federal Accounts in the name of The A Team Holdings LLC ending in 2958 and 3006
22	183	BECU records for The A Team Holdings LLC Account ending in 3331
23	184	BECU records for The A Team Holdings LLC Account ending in 3357
24	185	Signature Card for BECU Accounts in the name of The A Team Holdings LLC ending in 3331 and 3357
25	186	Wells Fargo records for The A Team Holdings LLC Account ending in 3536
26	187	Wells Fargo records for The A Team Holdings LLC Account ending in 9116
27	188	Signature Card for Wells Fargo Accounts in the name of The A Team Holdings, LLC ending in 3536 and 9116
28	189	Home Street records for The A Team Holdings LLC Account ending in 4333

1	190	Signature Card for Home Street Account in the name of The A Team Holdings LLC ending in 4333
2	191	Home Street records for The A Team Holdings LLC Account ending in 8005
3	192	Signature Card for Home Street Account in the name of The A Team Holdings LLC ending in 8005
4	193	Home Street records for Eric R Shibley Account ending in 1356
5	194	Signature Card for Home Street Account in the name of Eric R Shibley ending in 1356
6	195	US Bank records for Eric R Shibley Account ending in 1741
7	196	Signature Card for US Bank Account in the name of Eric R Shibley ending in 1741
8	197	NFCU records for Eric R Shibley Account ending in 3669
9	198	US Bank records for Eric R Shibley Account ending in 4522
10	199	NFCU records for Eric R Shibley Account ending in 5052
11	200	NFCU records for Eric R Shibley Account ending in 6122
12	201	Wells Fargo records for Dituri Construction LLC Account ending in 5564
13	202	Wells Fargo records for Dituri Construction LLC Account ending in 5572
14	203	Signature Card for Wells Fargo Accounts in the name of Dituri Construction LLC ending in 5564 and 5572
15	204	5/13/2020 Photos from BECU
16	205	Summary Charts of PPP and EIDL Applications
17	206	Summary Charts of Funded Loans
18	207	Summary Chart of EIDL Applications
19	208	Summary Charts of Bank Records and Payroll
20	209	Summary Charts of Money Transfers
21	210	Reserved
22	211	FDIC Certificate of Authenticity – Celtic Bank
23	212	FDIC Certificate of Authenticity – Customer’s Bank
24	213	FDIC Certificate of Authenticity – TCF National Bank
25	214	IRS Form 941 Records for Shibley Entities from Pinnacle Signature
26	215	IRS Form W-3 Records for Shibley Entities from Pinnacle Signature
27	216	Schedule C Tax Records for Shibley Entities from Pinnacle Signature
28	217	IRS Form 7200 Records for Shibley Entities from Pinnacle Signature
	218	Records of IRS Denials of Forms 7200 from Pinnacle Signature
	219	7/13/2020 Email between Shibley, Mario Davis, and Phebe Fuqua
	220	7/14/2020 Email between Shibley, Mario Davis, and Phebe Fuqua
	221	8/5/2020 Email between Shibley and Mario Davis
	222	8/5/2020 Email between Shibley, Mario Davis, and Phebe Fuqua
	223	8/9/2020 Email between Shibley and Mario Davis
	224	9/7/20 IRS Tax Bill from Pinnacle Signature

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Signed Stipulation of Facts regarding Shibley Entity production

Dated this 11th day of November, 2021.

Respectfully Submitted,

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United States Attorney

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