

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No. 21-cr-00165-RM

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. RUSSELL FOREMAN, and
2. CHANDLER SIMBECK,

Defendants.

UNITED STATES' NOTICE TO COURT REGARDING RESTORATION

COMES NOW the United States of America, by and through United States Attorney Peter McNeilly and Assistant United States Attorney Tonya S. Andrews, and hereby gives notice to the Court that a Restoration Request has been granted to apply the net proceeds of the assets forfeited in this case towards the satisfaction of the restitution orders entered against defendant Russel Foreman on August 17, 2022, and defendant Chandler Simbeck on December 18, 2023.

The Clerk of the Court has received payment towards restitution from the net proceeds from the following forfeited assets, totaling \$38,032.95:

- a. Approximately \$36,106.22 seized from Citizens Bank account #6441,
- b. Approximately \$425.00 seized from Federal Credit Union account #3025,
- c. Approximately \$999.33 seized from Navy Federal Credit Union account #8829 held in the name of Russell R. Foreman,

- d. Approximately \$183.33 seized from FanDuel account #3300 held in the name of Russell Foreman,
- e. Approximately \$282.49 seized from FanDuel account #5854 held in the name of Chandler Simbeck, and
- f. Approximately \$36.58 seized from TD Ameritrade account #9345 in the name of Russell Ray Foreman.

DATED this 22nd day of January 2026.

Respectfully submitted,

PETER MCNEILLY
United States Attorney

By: s/ Tonya S. Andrews
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of January 2026, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notice to all counsel of record.

s/ Amanda Gordon
FSA Federal Paralegal
United States Attorney's Office