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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. DENNY BHAKTA, Defendant.	Case No.: 21-CR-3352-JLS **STIPULATION REGARDING FDIC INSURED STATUS OF FINANCIAL INSTITUTIONS**

Plaintiff, the United States of America, by and through its counsel, Tara K. McGrath, United States Attorney, and P. Kevin Mokhtari and Eric R. Olah, Assistant United States Attorneys, Defendant Denny Bhakta, by and through his counsel Laura F. Marran and John D. Kirby, hereby stipulate that the following facts are true and may be read to the jury at trial:

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All of the financial institutions in this case—including Wells Fargo Bank, N.A.; First Republic Bank; Bank of America, NA; Celtic Bank; WebBank; Customers Bank; Vista Bank; Endeavor Bank; Bank of Southern California, N.A. (now California Bank of Commerce); Cache Valley Bank; First Citrus Bank; and Bank of Whittier, NA—are banks that are federally insured by the Federal Deposit Insurance Corporation ("FDIC"). All of these financial institutions were federally insured by the FDIC on the dates of the offenses charged in the indictment and on all dates relevant to this case.

SO STIPULATED AND AGREED.

DATED: October 21, 2024

P. KEVIN MOKHTARI
ERIC R. OLAH
Assistant U.S. Attorneys

DATED: October 21, 2024

LAURA F. MARRAN
JOHN D. KIRBY
Counsel for Denny Bhakta

DATED: October 21, 2024

DENNY BHAKTA
Defendant