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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

**REAL PROPERTY LOCATED AT
180 NORTH UNIVERSITY AVENUE,
SUITES 400 AND 410, IN UTAH
COUNTY, STATE AND DISTRICT OF
UTAH, WITH BUILDINGS,
APPURTENANCES, AND
IMPROVEMENTS, *in rem*,**

and

**REAL PROPERTY LOCATED AT 2595
NORTH 140 EAST, UNIT 204, IN UTAH
COUNTY, STATE AND DISTRICT OF
UTAH, WITH BUILDINGS,
APPURTENANCES, AND
IMPROVEMENTS, *in rem*,**

Defendants.

Case No. 3:25-cv-02162-MO

**COMPLAINT IN REM
FOR FORFEITURE**

Plaintiff, United States of America, for its Complaint *in rem* for forfeiture, alleges:

COUNT 1

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 18 § 981; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, consist of real property further described as:

- **Defendant Real Property 1:** 180 North University Avenue, Suite #400 and Suite #410, Provo, Utah 84601. This property comprises the entire fourth floor of the Zions Bank Financial Center and is further described in Utah County records as follows:

Parcel 1: (53-448-0400), (Suite 400)

Parcel 2: (53-448-0410), (Suite 410)

Unit 400 and 410, contained within the 200 North Condominium, a condominium project, as the same is identified in the record of survey map recorded on February 11, 2010, in the Utah County, as Entry No. 12195:2010, in Book 53, at Page 448(as said record of survey map may have heretofore been amended or supplemented) and in the declaration recorded February 11, 2010 in Utah County, as Entry No. 12196:2010 (As said Declaration may have heretofore been amended or supplemented).

Together with the appurtenant undivided interest in said project's common areas, as established in the declaration, and allowing for periodic alteration both in the magnitude of said undivided interest and in the composition of the common areas and facilities to which said interest relates.

- **Defendant Real Property 2:** 2595 North 140 East, Unit 204, Provo, Utah 84604.

This is a single-level condominium of approximately 1,912 square feet, located in a secure building. It includes three bedrooms and two and a half bathrooms. The property is further described in Utah County records as:

Parcel: 54-183-0010

Unit No. 204, Building 1, within the *Villas at the Country Club Condominiums Phase I*, a Utah Condominium Project, as the same is identified in the Record of Survey Map recorded in the office of the County Recorder, as Entry No. 6750:2004, and Map Filing No. 10322-116, and as further defined and described in the Declaration of Covenants, Conditions, and Restrictions and Bylaws of said Condominium Project, recorded in the office of the Utah County Recorder on January 21, 2004, as Entry No. 6751:2004), (as said Map and Declaration may be amended and/or Supplemented).

Together with: (a) The undivided ownership interest in said Condominium Project's Common Areas and Facilities which is appurtenant to said Unit (the referenced Declaration of Condominium providing for periodic alteration both in the magnitude of said undivided ownership interest and in the composition of the Common Areas and Facilities to which said interest relates); (b) The exclusive right to use and enjoy each of the Limited Common Areas which is appurtenant to said Unit; and (c) The non-exclusive right to use and enjoy the Common Areas and Facilities included in said Condominium Project (as said Project may hereafter be expanded) in accordance with the aforesaid Declaration of Survey Map (as said Declaration and Map may hereafter be amended or supplemented) and the Utah Condominium Ownership Act

(hereinafter, DEFENDANT REAL PROPERTIES).

III.

DEFENDANT REAL PROPERTIES are now and during the pendency of this action will be within the jurisdiction of this Court. DEFENDANT REAL PROPERTIES are located in the State of UTAH, Utah County.

IV.

DEFENDANT REAL PROPERTIES, as described above, represent property purchased with, or are traceable to, proceeds of wire fraud, in violation of 18 U.S.C. § 1343, and are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the Declaration of Special Agent Katherine Fearn, Internal Revenue Service-Criminal Investigation

(IRS-CI), marked as Exhibit A, attached and fully incorporated herein by this reference.

COUNT 2

V.

DEFENDANT REAL PROPERTIES, as described above, represent property involved in money laundering, in violation of 18 U.S.C. § 1957, and are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and (a)(1)(A), as more particularly set forth in the Declaration of Special Agent Katherine Fearn, Internal Revenue Service-Criminal Investigation (IRS-CI), marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of DEFENDANT REAL PROPERTIES, *in rem*; that due notice be given to all interested persons to appear and show cause why forfeiture of these Defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: November 21, 2025.

Respectfully submitted,

SCOTT E. BRADFORD
United States Attorney

/s/ Christopher Cardani
CHRISTOPHER L. CARDANI
Assistant United States Attorney

VERIFICATION

I, KATHERINE M. FEARN declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Internal Revenue Service-Criminal Investigation (IRS-CI), and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Katherine Fearn
KATHERINE M. FEARN
Special Agent
Internal Revenue Service
Criminal Investigation (IRS-CI)