

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,** )

**Plaintiff,** )

**v.** )

**Case No. 15-CV-324-GKF-TLW**

**REAL PROPERTY COMMONLY** )

**KNOWN AS 7208 EAST 65TH** )

**PLACE, TULSA, OKLAHOMA; et** )

**al.,** )

**Defendants.** )

**OPPOSITION TO CLAIMANT MAUREEN LONG’S MOTION  
FOR THE RETURN OF SEIZED PROPERTY**

The United States of America, by its counsel, opposes Claimant Maureen Long’s Motion for the Return of Seized Property. In support of its opposition, the Government says the following.

**BACKGROUND**

On March 17, 2016, 2016, the Government filed a motion to dismiss the claim of Maureen Long on the ground that she is a fugitive from justice whose claim should be dismissed under the fugitive disentitlement doctrine, 28 U.S.C. § 2466. (Dkt. # 44).

On April 4, 2016, Claimant filed an Opposition to the Motion for Dismissal of Claim for Fugitive Disentitlement & Motion for Release and Return of Illegally Seized and Detained Property. (Dkt. # 51). The Government regarded this pleading as both an opposition to its pending motion to dismiss under Section 2466 and a separate motion for

the return of illegally seized property, presumably based on Rule 41(g) of the Federal Rules of Criminal Procedure.

The Government responded to the Opposition to the Motion for Dismissal on April 7, 2016 (Dkt. # 53), and Claimant filed a surreply on April 20, 2016 (Dkt. # 61). That motion remains pending before the court.

The Government now files its opposition to Claimant's Motion for Release and Return of Illegally Seized and Detained Property.

### **FACTS**

The property in question consists of various items of personal property that were seized pursuant to warrants issued in Case Nos. 13-MJ-00122-TLW and 13-MJ-00129-FHM by Magistrate Judges T. Lane Wilson and Frank H. McCarthy. See Exhibits A and B. As set forth in the Verified Complaint, the property includes \$44,450.06 and \$30,638.94 seized on April 23 and 26, 2015 from account xxx3081 at Regents Bank in the name of Camelot Cancer Care, Inc.; and \$50,082.02 seized on April 25, 2015 from account \*\*\*8647 at the First National Bank of Broken Arrow in the name of The Camelot Trust. The property also includes "furnishings, antiques and personal property of Maureen Long and/or Camelot Cancer Care" seized from Long's former residence at 10716 South 66<sup>th</sup> East Avenue, Tulsa. Verified Complaint at 6.

### **DISCUSSION**

#### **A. The Court Must First Address the Fugitive Disentitlement Motion.**

Pending before the court is the Government's motion to dismiss Claimant's claim under the fugitive disentitlement doctrine, 28 U.S.C. § 2466. Because it relates to the

claimant's ability to litigate *any issue* in a civil forfeiture action, a motion filed by the United States to strike the claim under Section 2466, like a challenge to the claimant's standing, must be addressed before the court considers any motion filed by the claimant. *See United States v. \$671,160.00 in U.S. Currency*, 730 F.3d 1051, 1059 (9<sup>th</sup> Cir. 2013) (because invocation of the fugitive disentitlement doctrine means claimant cannot litigate any issue, district court correctly declined to consider claimant's motion to suppress before granting Government motion to strike); *United States v. \$6,976,934.65 Plus Interest*, 478 F. Supp. 2d 30, 45 (D.D.C. 2007) (because applying the fugitive disentitlement doctrine will bar a claimant from contesting a forfeiture on any ground, the court must rule on the Government's section 2466 motion before addressing any motion filed by the claimant); *United States v. \$6,976,934.65 Plus Interest*, 486 F. Supp. 2d 37, 39 (D.D.C. 2007) (same case, denying motion for reconsideration on this issue, and holding that the Government's motion under section 2466 must take precedence over any threshold motion that would favor the fugitive, including a motion to dismiss for improper venue), rev'd on other grounds, 554 F.3d 123 (D.C. Cir. 2009); *United States v. All Funds...Held in the Name of Kobi Alexander*, 2007 WL 2687660 (E.D.N.Y. 2007) (applying the fugitive disentitlement doctrine will mean that claimant will not be able to contest the forfeiture on Eighth Amendment grounds; by maintaining his fugitive status, claimant has waived his right to press his excessive fines claim).

Accordingly, the court should address the Government's motion to dismiss under the fugitive disentitlement doctrine before addressing the instant motion for the return of seized property. If the court grants the motion to dismiss, the instant motion, insofar as it

has been filed as part of Claimant's request for relief in the pending civil forfeiture action, will be rendered moot.

**B. Criminal Defendants are Barred from Moving for the Return of Seized Property Prior to Trial**

Even if the court does not grant the pending motion to dismiss, Claimant would have no right to seek the return of her seized personal property prior to trial.

It is well-established that a Rule 41(g) motion for return of seized property cannot be used to challenge the probable cause for the seizure of property subject to forfeiture once forfeiture proceedings have been commenced, because at that point the claimant has an adequate remedy at law. *See United States v. Sims*, 376 F.3d 705, 708 (7th Cir. 2004) (“The proper office of a Rule 41(g) motion is, before any forfeiture proceedings have been initiated, or before any criminal charges have been filed, to seek the return of property seized without probable cause, or property held an unreasonable length of time without the institution of proceedings that would justify the seizure and retention of the property.”); *United States v. One 1987 Jeep Wrangler*, 972 F.2d 472, 479 (2d Cir. 1992) (the district court loses subject matter jurisdiction to adjudicate claims regarding the seizure once the Government commences forfeiture proceedings); *\$8,050.00 in U.S. Currency v. United States*, 307 F. Supp. 2d 922, 926-27 (N.D. Ohio 2004) (comprehensive provisions enacted by CAFRA in section 983(a) give claimant an adequate remedy at law for contesting a civil forfeiture; thus, once the Government commences administrative forfeiture, the Rule 41(g) motion must be dismissed; claimant's argument that he filed his motion first is without merit); *Baranski v. Fifteen*

*Unknown Agents of ATF*, 195 F. Supp. 2d 862, 868 (W.D. Ky. 2002) (court has no jurisdiction to consider a Rule 41([g]) motion raising Fourth Amendment issues where pending civil forfeiture action gives claimants adequate remedy at law). *Cf. United States v. Faulkner*, 2011 WL 1882380, \*3 (W.D. Okla. May 17, 2011) (rejecting Rule 41(g) motion filed in criminal case on the ground that defendant's remedy is to contest the forfeiture in the forfeiture proceeding that the Government commenced after seizing the property for civil forfeiture).

As discussed below, there is an exception to this rule that applies when the Claimant asserts that she needs the seized funds to hire counsel of her choice in a criminal case and satisfies the two requirements set forth by the Tenth Circuit in *United States v. Jones*. Absent qualifying for that exception, however, Claimant's only vehicle for seeking the return of the seized property is to file a claim in the pending civil forfeiture proceeding and to appear in person to oppose the forfeiture on the merits. That Claimant is refusing to enter the United States to participate in the forfeiture proceeding does not, by itself, create an "fugitive exception" to the bar on moving for the return of seized property once a forfeiture proceeding has been commenced, nor does it mean that Claimant lacks an adequate remedy at law.

In short, Claimant, like any other person seeking the return of seized property, has a remedy: she can appear in this district and oppose the forfeiture action.

### **C. Claimant has not Satisfied the Requirements of *United States v. Jones***

In *United States v. Jones*, 160 F.3d 641 (10th Cir. 1998), the Tenth Circuit created an exception to the bar on pre-trial motions for the return of seized property that applies

when the property owner asserts that she needs the property to exercise her right to retain counsel of her choice in a pending criminal proceeding, as guaranteed by the Sixth Amendment. The exception applies equally whether the property in question was seized in the criminal case itself or in a parallel civil proceeding. *See United States v. Farmer*, 274 F.3d 800, 804-05 (4th Cir. 2001) (following *Jones*; same two-part test applies where property defendant says he needs to hire counsel in criminal case has been seized or restrained in related civil forfeiture case); *United States v. Bonventre*, 720 F.3d 126, 132 (2nd Cir. 2013) (the Second Circuit's version of *Jones-Farmer* applies when the property is restrained in a related civil case, but noting that the Government's probable cause showing is necessarily different). The exception is commonly known as the *Jones-Farmer* rule.

Under *Jones* and *Farmer*, a criminal defendant is entitled to a hearing at which she may contest the probable cause for the pre-trial restraint or seizure of her property only if she satisfies two requirements: that she has no other funds with which to hire counsel or to pay for living expenses, and that there is bona fide reason to believe the restraining order or seizure warrant should not have been entered. *Jones*, 160 F.3d at 647; *Farmer*, 274 F.3d at 804-05. If the moving party cannot satisfy both requirements, she is not entitled to a hearing and the property will remain under the Government's custody or control until the conclusion of the pending forfeiture proceeding. *Jones*, 160 F.3d at 647.

In this case, Maureen Long has asserted that she needs the seized property to hire counsel for her defense in the criminal case pending in Kansas. Motion for the Release

and Return at 4. But she has offered no evidence sufficient to satisfy either requirement of the *Jones-Farmer* rule.

**1. The burden is on the movant to show that she lacks other funds with which to retain counsel**

Claimant bears the burden of persuading the court that she has no other assets with which to retain counsel. *Jones*, 160 F.3d at 647. To do so, she cannot simply rely on her own self-serving statement that she needs the money. *See United States v. Kielar*, 791 F.3d 733 (7<sup>th</sup> Cir. 2015) (defendant’s one-and-a-half page affidavit without documentary support was insufficient to show that he lacked other funds with which to retain counsel); *United States v. Daugerdas*, 2012 WL 5835203, \*2 (S.D.N.Y. Nov. 7, 2012) (denying motion to release funds where it was “bereft of any sworn declaration that [Defendant] lacks the financial resources to hire counsel”; conclusory assertion is insufficient). To the contrary, she must disclose her net worth, provide a comprehensive list of her assets, and explain how she has been paying her significant living expenses. *United States v. Bonventre*, 720 F.3d 126, 133 (2<sup>nd</sup> Cir. 2013). *See United States v. Emor*, 794 F. Supp. 2d 143, 150 (D.D.C. 2011) (a bare-bones statement that defendant has only \$50,000 in cash on hand, multiple dependents and no income is insufficient; nor can defendant wait until the probable cause hearing is commenced to satisfy the requirement; it is a threshold showing that must be made before the hearing); *United States v. Edwards*, 856 F. Supp. 2d 42, 45-46 (D.D.C. 2012) (following *Emor*; defendant must disclose his assets, liabilities, and sources of income; say how much he has already paid counsel and how much more he needs; and demonstrate that the property belongs to him so that it will be

available to pay counsel if released); *United States v. Fisch*, 2013 WL 5774876, \*6 (S.D. Tex. Oct. 24, 2013) (denying request for hearing where defendant's *in camera* showing of his lack of other assets was insufficient; defendant must disclose his net worth, living expenses, and sources of income).

Indeed, of particular pertinence to this case, the person requesting the probable cause hearing must show that she does not have access to funds from third parties, such as the corporation that she controls or from friends or family members who have been supporting her while she is hiding abroad. *See United States v. Jamieson*, 189 F. Supp. 2d 754, 757 (N.D. Ohio 2002) (to satisfy the Sixth Amendment requirement, defendant must show he has no access to funds from friends or family); *United States v. Emor*, 794 F. Supp. 2d at 149 (among other things, defendant failed to show that he did not have access to funds from the corporation that he controlled to pay for counsel); *United States v. Marshall*, 2015 WL 4139368, \*5 (N.D. W. Va. July 9, 2015) (to qualify for a probable cause hearing under *Jones-Farmer*, the defendant must disclose all of his assets and demonstrate that he lacks other funds – including funds from friends and family – with which to retain counsel).

Claimant has done none of these things. In support of her challenge to the seizure of her personal property she simply submits, from an undisclosed location, that she has been “stripped of all that I own,” and that the seized property is vital to her defense. Motion for Release and Return at 6-7. The abundant case law on this issue counsels that such unsupported, conclusory statements are insufficient to satisfy the first requirement under *Jones*.

**2. Claimant has made no showing that the issuance of the seizure warrant was improper**

Even if Claimant were able to satisfy the first requirement under *Jones*, she has made no effort to satisfy the second requirement.

As the Tenth Circuit held in *Jones*, the second requirement – a showing of a bona fide reason to believe that the seized assets are not subject to forfeiture – is necessary to “protect the Government and its resources from frivolous challenges.” *Jones*, 160 F.3d at 647. Yet Claimant has provided no grounds whatsoever to support her claim that the seized property was derived from a legitimate source, and not from the offense giving rise to the pending forfeiture action. She says only that many of the seized items were family heirlooms unrelated to her business. Motion for Release and Return at 3.

Claimant’s reference is apparently to the furniture and antiques at were seized from her residence. Even as to those items, however, such an unsupported, self-serving statement would not be sufficient. *See United States v. Vogel*, 2010 WL 547344, \*3 (E.D. Tex. Feb. 10, 2010) (defendant cannot rely on self-serving statement regarding the legitimate source of the property to satisfy the second *Jones-Farmer* requirement). Claimant makes no representation whatsoever as to the money seized from the bank accounts.

To be sure, Claimant is correct when she says that the burden of proof does not rest on her to prove the legitimate source for the seized items. *Jones*, 160 F.3d at 647. But she does bear a burden of production. *Id.* Only if she provides the court with at least a “prima facie showing of a bona fide reason to believe” that her property was seized in

error would she be entitled to “an adversarial hearing at which the Government must establish probable cause to believe that the [seized] assets are traceable to the underlying offense.” *Id.* See *United States v. Dupree*, 795 F. Supp. 2d 115, 142-43 (E.D.N.Y. 2011) (denying post-seizure probable cause hearing because defendant failed to satisfy the second *Jones-Farmer* requirement by making a prima facie showing that the seizure lacked probable cause), motion for reconsideration granted in part, 2011 WL 3235637, \*3 (E.D.N.Y. July 27, 2011) (finding second prong of *Jones-Farmer* satisfied as to one set of bank accounts and ordering *Monsanto* hearing); *United States v. Peppel*, 2008 WL 687125, \*2, \*6 (S.D. Ohio 2008) (defendant satisfies the first prong of *Jones* but he is not entitled to probable cause hearing because he cannot satisfy the second prong; there was no reason to believe the grand jury erred in finding that the restrained property was traceable to criminal proceeds); *United States v. St. George*, 241 F. Supp. 2d 875, 878-80 (E.D. Tenn. 2003) (following *Jones*; defendant must make threshold showing that she lacks alternative source of funds to retain counsel and that there is reason to believe there is no probable cause for the forfeiture of the restrained property; denying hearing to defendant who failed to make second showing).

Claimant, however, has not satisfied even this minimal requirement. She contests the allegation that her conduct in operating the Camelot Cancer Care facility constituted fraud, but she offers nothing to support her claim that the seized property is not traceable to that conduct. See Motion for Release and Return at 4-6 (listing reasons why her operation of the cancer care service was not fraudulent). As the Supreme Court held in *Kaley v. United States*, \_\_\_ U.S. \_\_\_, 134 S. Ct. 1090 (2014), a person challenging the

pre-trial restraint or seizure of her property has no right to relitigate the grand jury's finding of probable cause to believe that the defendant committed the underlying crime; her sole basis for challenging the Government's custody or control of the property is that the property is not forfeitable because it is not traceable to the alleged offense. *Kaley*, 134 S. Ct. at 1105.

Here, a grand jury in the District of Kansas has found probable cause to believe that Claimant committed fraud in the operation of her business. The only question that she would be entitled to raise in a challenge to the pre-trial seizure of her property would be that the assets in question are not connected to the allegedly fraudulent conduct. Because Claimant has not made even a prima facie showing in that regard, she fails to satisfy the second *Jones-Farmer* requirement as well.

**D. Claimant must appear at the probable cause hearing if one is granted.**

As the Tenth Circuit held in *Jones*, a person who satisfies *both* of the *Jones-Farmer* requirements is entitled to an adversarial hearing at which she may contest the court's previous finding of probable cause to believe that the seized property is traceable to the offense giving rise to the forfeiture. *Jones*, 160 F.3d at 647. Here, Claimant has made *neither* showing, and thus is not entitled to any hearing.

Even if Claimant were to satisfy both *Jones-Farmer* requirements, however, the inquiry would not end. Satisfying the *Jones-Farmer* requirements gives the moving party a right to a probable cause hearing – commonly known as a *Monsanto* hearing. At the hearing, the Government would rely on the warrants issued by the Magistrate Judges to establish that there was probable cause for the seizures. Unless the claimant appears and

offers evidence contradicting the probable cause findings that were made, the warrants themselves would presumably establish the probable cause needed to allow the Government to maintain custody of the seized property. Thus, there would be little purpose in granting the hearing unless Claimant herself agreed to appear and submit evidence. Claimant, however, remains a fugitive.

### CONCLUSION

For all of these reasons, Claimant's Motion for Release and Return of the seized property should be denied.

RESPECTFULLY SUBMITTED,

DANNY C. WILLIAMS, SR.  
UNITED STATES ATTORNEY

/s/ Catherine J. Depew  
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Catherine.Depew@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on April 25, 2016, the foregoing document was electronically transmitted to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to counsel of record.

I hereby certify that on April 25, 2016, the foregoing document was served by United States Mail, proper postage prepaid, on the following, who are not registered participants of the ECF System:

Maureen Long, Pro Se  
10716 S. 66<sup>th</sup> E. Ave.  
Tulsa, OK 74133

/s/ Linda Peaden  
Linda Peaden  
Paralegal Specialist

AO 109 (Rev. 12/09) Warrant to Seize Property Subject to Forfeiture

# UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

In the Matter of the Seizure of )  
(Briefly describe the property to be seized) )  
MONIES, FUNDS AND FINANCIAL INSTRUMENTS )  
DEPOSITED OR CREDITED TO REGENT BANK, )  
ACCOUNT NO. [REDACTED] 3081 IN THE NAME OF )  
CAMELOT CANCER CARE, INC. )

Case No. 13-MJ-122-TLW

## WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests that certain property located in the Northern District of Oklahoma be seized as being subject to forfeiture to the United States of America. The property is described as follows:  
Proceeds of Regent Bank, Account No. [REDACTED] 3081 in the name of Camelot Cancer Care, Inc., including interest, dividends and credits thereto.

I find that the affidavit(s) and any recorded testimony establish probable cause to seize the property.

**YOU ARE COMMANDED** to execute this warrant and seize the property on or before 05/05/2013  
(not to exceed 14 days)

in the daytime – 6:00 a.m. to 10:00 p.m.       at any time in the day or night, as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must also give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

An officer present during the execution of the warrant must prepare, as required by law, an inventory of any property seized and the officer executing the warrant must promptly return this warrant and a copy of the inventory to United States Magistrate Judge T. Lane Wilson  
(name)

I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)  for \_\_\_\_\_ days (not to exceed 30).

until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: 4/22/13 @ 1:06 pm      T. Lane Wilson  
Judge's signature

City and state: Tulsa, Oklahoma      T. Lane Wilson, United States Magistrate Judge  
Printed name and title

Exhibit "A"

AO 109 (Rev. 12/09) Warrant to Seize Property Subject to Forfeiture (Page 2)

**Return**

Case No.: 13-MJ-122-TLW	Date and time warrant executed: 04/23/13 - 11 ahrs	Copy of warrant and inventory left with: Ross Hoyle
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Inventory made in the presence of:  
Ross Hoyle

Inventory of the property taken:

1- Regent Bank- Cashier's Check  
CK# 091876 \$44,450.00

2- REGENT BANK CASHIER'S CHECK # 091893 IN THE AMOUNT OF  
\$30,638.94 (CHECK RECOVERED ON 4/26/2013 BY FBI SA ROGERS)

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: 4/23/13

Todd Blair  
*Executing officer's signature*

Todd Blair, Special Agent  
*Printed name and title*

AO 109 (Rev. 12/09) Warrant to Seize Property Subject to Forfeiture

# UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

In the Matter of the Seizure of )  
(Briefly describe the property to be seized) )  
MONIES, FUNDS AND FINANCIAL INSTRUMENTS )  
DEPOSITED OR CREDITED TO FIRST NATIONAL )  
BANK OF BROKEN ARROW, ACCOUNT NO. )  
8647 IN THE NAME OF THE CAMELOT TRUST )

Case No. 13-MJ-129-FHM

## WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests that certain property located in the Northern District of Oklahoma be seized as being subject to forfeiture to the United States of America. The property is described as follows:

MONIES, FUNDS AND FINANCIAL INSTRUMENTS DEPOSITED OR CREDITED TO FIRST NATIONAL BANK OF BROKEN ARROW, ACCOUNT NO. 8647 IN THE NAME OF THE CAMELOT TRUST

I find that the affidavit(s) and any recorded testimony establish probable cause to seize the property.

**YOU ARE COMMANDED** to execute this warrant and seize the property on or before 05/07/2013  
(not to exceed 14 days)

in the daytime – 6:00 a.m. to 10:00 p.m.  at any time in the day or night, as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must also give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

An officer present during the execution of the warrant must prepare, as required by law, an inventory of any property seized and the officer executing the warrant must promptly return this warrant and a copy of the inventory to United States Magistrate Judge Frank H. McCarthy

(name)

I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)  for \_\_\_\_\_ days (not to exceed 30).

until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: 4-24-13 4:07 PM

  
Judge's signature

City and state: Tulsa, Oklahoma

Frank H. McCarthy, United States Magistrate Judge

Printed name and title

Exhibit "B"

AO 109 (Rev. 12/09) Warrant to Seize Property Subject to Forfeiture (Page 2)

**Return**

Case No.: 13-MJ- 129-FHM	Date and time warrant executed: 4/25/13 9:45 am	Copy of warrant and inventory left with: Teresa Fleming
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Inventory made in the presence of:

Inventory of the property taken:

First National Bank of Broken Arrow check # 326878  
in amount of \$50,087.02. Payable to "U.S. Marshal Service"

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: 4/25/13

  
\_\_\_\_\_  
Executing officer's signature

Rebecca Rogers Special Agent  
\_\_\_\_\_  
Printed name and title



FIRST NATIONAL BANK  
BROKEN ARROW

121 South Main  
Broken Arrow, OK 74012-4140  
(918) 251-5371

326878

REMITTER

The Camelot Trust

DATE 04-25-2013

86-288/1031

PAY TO THE ORDER OF \*\*\* U. S Marshal Service\*\*\*

\$ \*\*50,082.02\*\*

FIRST NATIONAL BANK

\$ 50,082dols 02cts

DOLLARS  Security Features Details on Back

### CASHIER'S CHECK

The purchase of an Indemnity Bond will be required before any Official Check purchased at this Bank will be replaced or refunded in the event it is lost, misplaced or stolen.

*Nancy Utter*  
COUNTERSIGNATURE REQUIRED IF OVER \$10,000.00  
*[Signature]*

⑈ 3 268 78 ⑈ ⑆ 103102889 ⑆ ⑈ 50 000 13 ⑈