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IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACOB KINGSTON,
 ISAAH KINGSTON,
 LEV ASLAN DERMEN,
 a/k/a Levon Termendzhyan,
 RACHEL KINGSTON, and
 SALLY KINGSTON,

Defendants.

Case No. 2:18CR00365-JNP-BCW

FIRST BILL OF PARTICULARS

Judge Jill N. Parrish
 Magistrate Judge Brooke C. Wells

The United States of America hereby files the following First Bill of Particulars for
 Forfeiture of Property.

The United States hereby gives notice that in accordance with its Notice of Intent to Seek Forfeiture in the Indictment, the United States provides the following updated list of assets for which it seeks forfeiture under 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1), 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c):

- a. The physical plant once known as Washakie Renewable Energy, LLC, located at 7550 W 24000 N Plymouth, Utah, and all the equipment installed therein, and affixed thereto.
- b. Real property located at:
 1. 2072 East Creek Road, Sandy, Utah 84190 United States
 2. 16572 Somerset Ln., Huntington Beach, CA 92649
 3. 4400 S. 700 E., Salt Lake City, UT 84107
 4. 4829 S. 3960 W., Taylorsville, UT 84129
 5. 4271 S. 1300 E., Salt Lake City, UT 84124
 6. 1415 W. Crystal Ave., West Valley City, UT 84119 (APN 15-22-476-016)
 7. 13 Acres FM 511 @ FM, Brownsville, TX 78521
 8. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel #07-090-0002)
 9. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel #07-037-0001)
 10. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel #08-041-0004)
 11. 24050 N. 600 W Plymouth Box Elder County, Utah 84330 United States (Parcel #08-041-0019)
 12. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 8433 United States (Parcel #08-041-0020)
 13. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel #08-041-0025)
 14. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel #08-041-0026)
 15. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel 08-041-0027)
 16. 24050 N. 600 W. Plymouth Box Elder County, Utah 84330 United States (APN 08-041-0028)
 17. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel 08-42-0018)
 18. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel #08-045-0005)

19. 24050 N. 600 W. Plymouth, UT 84330 Box Elder County, Utah 84330 United States (Parcel #08-052-0008)
20. 2973 W. Mackay Meadows Pl., Salt Lake City, UT 84119
21. 2338 S. 1360 W. Salt Lake City, UT 84119
22. Real property in the Corozal free-zone area of Belize
23. 1305 W. Main, Mesa, AZ 85201 (APN: 134-31-005-F4)
24. 3179 S. Village Pine Cove, West Valley City, UT 84128
25. 8228 S. 2700 W., West Jordan, UT 84088
26. 7504 S. 2200 W., West Jordan, UT 84084
27. 1516 W. Culpepper Cir., Taylorsville, UT 84123
28. Deep Creek Ranch Ibapah, UT 84034 (APN: 07-097-0-0004)
29. 1401 W. Crystal Ave., West Valley City, UT 84119 (APN: 15-22-476-016)
30. 3365 S. Diamond Ridge Cir., West Valley City, UT 84128 (14-27-351-036)
31. 6710 S. 2700 W., West Jordan, UT 84084
32. 1995 W. Alexander St., Salt Lake City, UT 84119
33. 3062 E. Ensign Park Dr., Magna, UT 84044
34. 13907 S. 2200 W., Bluffdale, UT 84065
35. 3475 S. Centennial Rd., Magna, UT 84044
36. 780 N 1100 W., West Bountiful, UT 84087
37. 1533 W. Dowry Ct., Taylorsville, UT 84123 (APN: 21-15-409-040)
38. 5090 S. 1130 W., Taylorsville, UT 84123 (APN: 21-11-303-008)
39. 6938 W. Hunter Valley Dr., West Valley City, UT 84128 (APN: 14-27-330-010)
40. Vacant Land, Woods Cross, UT 84087 (APN: 06-079-0083)
41. APN: 15-25-230-024 Salt Lake City, UT
42. 2928 S. 7200 W., Magna, UT 84044
43. 1896 W. Seargent Dr., Salt Lake City, UT 84116 (APN: 08-27-108-008-0000)
44. 445 E. Wilson Ave., Salt Lake City, UT 84115
45. 850 W. 600 N., West Bountiful, UT 84087
46. 1672 W. Southgate Ave., West Valley City, UT 84119 (APN: 15-22-454-021)
47. 7292 S. Redwood Rd., West Jordan, UT 84084
48. 22555 N Frontage Rd, Portage, UT 84331 (APN: 08-052-0012)
49. Box Elder County, Utah APN: 08-052-0014
50. Box Elder County, Utah APN: 08-052-0006
51. Box Elder County, Utah APN: 08-052-0005
52. Box Elder County, Utah APN: 08-052-0004
53. Box Elder County, Utah APN: 08-044-0004

c. The following vehicles:

1. 2010 Bugatti Veyron, Vehicle Identification Number (“VIN”) VF9SC2C23AM795205;
2. 2015 Lamborghini Aventador, VIN: ZHWUR1ZD2FLA03759;

3. 2011 Cadillac Escalade, VIN: 1GYS4CEF8BR217610;
4. 2013 Lincoln MKX, VIN: 2LMDJ8JK8DBL49070;
5. 2013 Audi Q7, VIN: WA1LMAFEXDD009274.

d. Proceeds from the sale of the following vehicles:

1. 2008 Lamborghini Murcielago, VIN: ZHWBU37S78LA02905
2. 2007 Ferrari 599, VIN: ZFFFC60A070156760
3. Six Kenworth T660 trucks with the following VINs: 1XKAD49X9EJ418286; 1XKAD49X9EJ418287; 1XKAD49X9EJ418406; 1XKAD49X9EJ418407; 1XKAD49X9EJ417967; 1XKAD49X9EJ423229.

e. Property purchased in or traceable to the following transactions:

Date	Title Company	Bank Account	Amount
08/23/2013	InWest Title Services	Fidelity 1212	\$377,131.52
12/09/2013	InWest Title Services	BofA 9516	\$164,000.00
03/06/2014	Sterling Drive	Fidelity 1212	\$523,678.42
03/07/2014	Service Link LLC	USB 0221	\$332,000.00
03/14/2014	Key Bank	USB 0221	\$284,000.00
11/17/2014	American Secure Title	WRE 4874	\$407,772.92
3/20/2015	American Secure Title	WRE 5016	\$417,393.97
10/16/2015	American Secure Title	USB 0221	\$326,427.56
04/15/2015	American Secure Title	WRE 5016	\$1,183,696.38

f. Any and all assets purchased or investments made using proceeds, whether through Washakie Renewable Energy, United Fuel Supply, SBK Holdings USA, Inc., or SBK Holding AS (Turkey), or Speedy Lion Renewable Fuel Investments, LLC, and any gains from those investments, including the following:

1. Mobstar, LTD (Ireland)
2. Vision Financial Markets, LLC
3. Set-App Technologies, Turkey including the following real properties:

City	Town	Neighborhood	Ada No.	Parcel		Owner
				No.	M ²	
Istanbul	Besiktas	Ortakoy	38	19	287,00	Setap
Istanbul	Besiktas	Kuru Cesme	172	18	80,00	Setap
Istanbul	Besiktas	Kuru Cesme	1283	5	198,00	Setap
Istanbul	Besiktas	Kuru Cesme	1283	6	225,75	Setap
Istanbul	Besiktas	Kuru Cesme	1283	7	276,25	Setap

4. Biopharma, Turkey
 5. Isanne, SARL
 6. Komak Isi Yalitim Sistamlari Sanayi (Turkey)
 7. Doga Dogan
 8. Mega Varlik Yonetim A.S.
 9. Accounts at Merrill Lynch
- g. All of the share interests and other equity of Beck's Sanitation, Inc., a Utah corporation, that Washakie Renewable Energy, LLC (signatory Jacob Kingston) purchased from Dan Magana in about July 2015.
- h. The outstanding balance of the loan owed by Zubair Kazi to SBK Holdings USA, Inc.; and
1. Any and all interest payments made or owed by Zubair Kazi.
 2. Any and all principal payments made or owed by Zubair Kazi.
- i. A MONEY JUDGMENT equal to the value of any property, real or personal, constituting or derived from proceeds traceable to the conspiracy and not available for forfeiture as a result of any act or omission of the defendant(s) for one or more of the reasons listed in 21 U.S.C. § 853(p).
- j. A MONEY JUDGMENT equal to the value of all property involved in the money laundering and not available for forfeiture for one or more of the reasons listed in 21 U.S.C. § 853(p) as a result of any act or omission of the defendant(s).

DATED this 18th day of July, 2019.

JOHN W. HUBER
United States Attorney

/s/ Cy H. Castle
CY H. CASTLE
Assistant United States Attorney