

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**NINE PARCELS OF REAL PROPERTY
IN HOWARD COUNTY, MISSOURI,**

Defendant.

Civil No. 24-

COMPLAINT FOR FORFEITURE *IN REM*

Plaintiff, United States of America, by its attorneys, Teresa A. Moore, United States Attorney for the Western District of Missouri, and Anthony M. Brown, Assistant United States Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is an action to forfeit property to the United States for violations of Title 18, United States Code Sections 981(a)(1)(A) and (a)(1)(C).

THE DEFENDANT IN REM

2. The Defendant Property consists of multiple parcels of real property in Howard County, Missouri, described¹ as follows (hereinafter “Parcels (a) through (i)”):

¹ The full legal descriptions of each parcel are attached as Exhibit A to this Complaint and are incorporated by reference.

- a. Parcel #09-5.0-16-000-000-004.020 - Section 16 Township 51 Range 14 85.81 AC +- IN THE W 1/2 OF SEC 16 TWN 51RNG 14 ALL LYING S OF CO RD 128, incorporated as Tract 1 in Exhibit A;
- b. Parcel #09-4.0-17-000-000-008.020 - Section 17 Township 51 Range 14 0232-02 SAC OFF E PT NW1/4 OF SE1/4; NE1/4 OF SE1/4 LESS 1.01 AC M/L LESS 20 AC M/L, incorporated as Tract 1 in Exhibit A;
- c. Parcel #09-5.0-21-000-000-001.040 - Section 21 Township 51 Range 14 5 AC +- IN THE NE QTR OF THE NW QTR OF SEC 21 TWN 51 RNG 14, incorporated as Tract 1 in Exhibit A;
- d. Parcel #09-5.0-16-000-000-004.040 - Section 16 Township 51 Range 14 80.90 AC +- IN THE NW & SW QTRS OF SEC 16 TWN 51 RNG 14 ALL LYING S OF CO RD 128, incorporated as Tract 2 in Exhibit A;
- e. Parcel #09-5.0-16-000-000-004.010 – Section 16 Township 51 Range 14 0243-00 BEG AT SE COR SW NE TH N 800' TO CO RD; THWLY ALONG RD TO MONITEAU CREEK; TH SLY AONG CREEK, incorporated as Tract 3 in Exhibit A;
- f. Parcel #09-5.0-16-000-000-002.000 – Section 16 Township 51 Range 14 0244-00 N1/2 SE LYING E OF MONITEAU CK & SE NE LYING S OF CO RD, incorporated as Tract 4 in Exhibit A;
- g. Parcel #09-5.0-15-000-000-005.000 - Section 15 Township 51 Range 14 0255-00 SW NW S OF CO RD & W 100' OF NW SW, incorporated as Tract 4 in Exhibit A;

- h. Parcel #09-5.0-16-000-000-004.000 - Section 16 Township 51 Range 14, 0243-00 N 1/2 SW 1/4; N 1/2 OF NW 1/4; SW 1/4 OF NW 1/4; NW 1/4 OF SE 1/4 LYING W OF MONITEAU CREEK, incorporated as Tract 5 as Exhibit A; and
 - i. Parcel #09-2.0-09-000-000-007.000 – Section 09 Township 51 Range 14 0292-00 S1/2 SW; THAT PT SE SW LYIN G S OF BR; PTSW SE BEG SW COR SE H E 868’ TO MONITEAU CK TH N, incorporated as Tract 5 in Exhibit A.
 3. The record owners of these parcels are Megan Dougherty, Harry Marshall Dougherty, Harry A. Dougherty, and Brenda J. Dougherty.
 4. Prior to the current record owners refinancing the parcels, Cane B. Cattle Company, LLC was a record owner along with the current owner of these parcels and is a potential interested party.
 5. The Defendant Property has not been seized but is located within the jurisdiction of the Court as described below. The United States does not request authority from the Court to seize the Defendant Property at this time. The United States will, as provided by 18 U.S.C. § 985(b)(1) and (c)(1):
 - a. Post notice of this action and a copy of the Complaint on the Defendant Property, and
 - b. Serve notice of this action on the owners of the Defendant Property, and any other person or entity who may claim an interest in the Defendant Property, along with a copy of this Complaint, and
 - c. File a *Lis Pendens* against the Defendant Property.

JURISDICTION AND VENUE

6. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action under 28 U.S.C. § 1355(a). This Court also has jurisdiction over this particular action under 18 U.S.C. § 981(a)(1)(C).

7. This Court has *in rem* jurisdiction over the Defendant Property, pursuant to 28 U.S.C. § 1355(b)(1)(A), because acts or omissions giving rise to the forfeiture occurred in this district.

8. Venue is proper in this district, pursuant to 28 U.S.C. § 1355(b)(1)(A), because acts or omissions giving rise to the forfeiture occurred in this district. Also, venue is proper in this district, pursuant to 28 U.S.C. § 1355(b)(1)(B), incorporating 28 U.S.C. § 1395, because this action accrued in this district and the Defendant Property are found in this district.

BASIS FOR FORFEITURE

9. The Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it constitutes property involved in a transaction or attempted transaction, in violation of 18 U.S.C. § 1957 or are traceable to such property.

10. The Defendant Property is subject to forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C) because it constitutes or was derived from proceeds traceable to offenses constituting a “specified unlawful activity” as defined in 18 U.S.C. § 1956(c)(7), that is bank fraud.

Fraudulent Scheme

11. As alleged below, at least as early as in or about 2008, and continuing to in or about October 2023, Megan Dougherty (“Dougherty”) devised a scheme and artifice to defraud her employer, Exchange Bank of Missouri (“EBOM”), and the customers thereof, by embezzling money from EBOM customer accounts.

12. Dougherty unlawfully transferred money held in EBOM customers' bank accounts or certificate of deposit ("CD") accounts into an account at EBOM held by Dougherty, including accounts #xx3026 and #xx6011.

13. Further, Dougherty concealed her scheme by mislabeling the description of the debits from the victimized accounts, and the corresponding credits deposited into her accounts, to make these fraudulent transactions appear legitimate.

14. Dougherty concealed her scheme by creating fictitious account statements, reporting the amount that should have been in the victimized accounts, and would mail these fabricated statements to the victimized EBOM customers.

15. Dougherty further concealed her scheme by transferring money from EBOM's general ledger account into a victimized customer's account. At the end of the day, Dougherty would transfer money from a customer's account into the general ledger account to reconcile the withdrawal from the general ledger account.

16. Upon discovering Dougherty's scheme in October 2023, Dougherty was terminated by EBOM and EBOM reimbursed a total of \$2,393,288.88 to the EBOM customer accounts from which she embezzled.

Purchase of Defendant Property With Fraud Proceeds

17. From an unknown date to at least October 2023, Dougherty comingled embezzled funds with other sources of income in her personal bank accounts.

18. Dougherty then used these comingled funds to purchase, improve, and pay taxes on the Defendant Property.

19. On October 10, 2018, Dougherty and Harry M. Dougherty financed the purchase of Parcels (a) through (g) with a \$500,888.25 loan (#xxx6019) from EBOM.

- a. On October 13, 2020, Dougherty deposited \$37,000.00 from EBOM CD account #x3046 in the name of F.H., without the account holder's authorization, into Dougherty's EBOM account #xx3026.
 - b. On that same day, \$35,770.00 was debited from Dougherty's EBOM account #xx3026 and applied towards EBOM loan #xxx6019.
 - c. On October 12, 2021, Dougherty deposited \$50,000.00 from EBOM CD account #x3072 in the name of S.M., without the account holder's authorization, into Dougherty's EBOM account #xx3026.
 - d. On that same day, \$35,770.00 was debited from Dougherty's EBOM account #xx3026 and applied towards EBOM loan #xxx6019.
20. A machine shop with concrete floors was built on Parcel (h) in 2021. As set forth below, funds used to pay for the construction of the machine shop are traceable to the fraud:
- a. On November 5, 2021, Dougherty deposited \$10,500.29 from EBOM CD account #x1230 in the name of F.H., without the account holder's authorization, into Dougherty's EBOM account #xx3026.
 - b. On that same date, check #2488 payable to "Boone Quarries" with "rock & concrete for shop" written in the memo line, for \$6,946.87 was debited from Dougherty's EBOM account #xx3026.
 - c. On November 15, 2021, Dougherty deposited \$10,500.62 from EBOM CD account #x3030 in the name of S.M., without the account holder's authorization, into Dougherty's EBOM account #xx3026.

- d. On that same date, check #2582 payable to “Harry Tipton” with “60 x 104 pad & (*illegible*)” written in the memo line for \$11,853.00 was debited from Dougherty’s EBOM account #x3026.
 - e. Harry Tipton reported that the payment was for labor to pour a concrete pad for a machine stop built adjacent to Dougherty’s residence.
21. Further, funds used to pay for property taxes on the Defendant Property are traceable to the fraud:
- a. On December 30, 2022, Dougherty made two deposits totaling \$5,873.62 from EBOM CD account #x3401, in the name of I.W., without the account holder’s authorization, into Dougherty’s EBOM account #xx6011.
 - b. On that same date, check #2398 payable to “HoCo Collector” for \$5,842.27 was debited from Dougherty’s EBOM account #xx6011.
 - c. Howard County, Missouri, Collector’s Office receipts document that this payment was applied toward a portion of the 2022 property taxes for the Defendant Property.

CLAIM FOR RELIEF

FIRST CLAIM FOR RELIEF

22. The Plaintiff repeats and incorporates by reference the paragraphs above.
23. By the foregoing and other acts, the Defendant Property was involved in transactions or attempted transactions, in violation of 18 U.S.C. § 1957, or is property traceable to such property, and therefore is forfeitable to the United States, pursuant to 18 U.S.C. § 981(a)(1)(A).

SECOND CLAIM FOR RELIEF

24. The Plaintiff repeats and incorporates by reference the paragraphs above.

25. By the foregoing and other acts, the Defendant Property constitutes, or was derived from, proceeds traceable to violations of Title 18, United States Code, Section 1344, that is, bank fraud, and therefore is forfeitable to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE the United States prays that the Defendant Property be forfeited to the United States, that the Plaintiff be awarded its costs and disbursements in this action, and for such other and further relief as the Court deems proper and just.

Respectfully submitted,

TERESA A. MOORE
United States Attorney

/s/ Anthony M. Brown _____
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VERIFICATION

I, Special Agent Sean McDermott, hereby verify and declare under penalty of perjury that I am a Special Agent with the Federal Bureau of Investigation, that I have read the foregoing Verified Complaint *In Rem* and know the contents thereof, and that the factual matters contained in paragraphs 11 through 21 of the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of the Federal Bureau of Investigation.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: 05-28-2024

/s/ Sean McDermott
Sean McDermott
Special Agent
Federal Bureau of Investigation

Exhibit A

Tract 1

A tract of land lying in Sections 16, 17 & 21, Township 51 North, Range 14 West, Howard County, Missouri and being more fully described as follows to-wit:

Beginning at a found iron pin marking the Quarter Corner common to said Sections 16 & 17;

Thence South 88 degrees, 28 minutes and 03 seconds East along the East-West centerline of said Section 16 a distance of 1275.88 feet to a found iron pin marking the Northeast Corner of the Northwest Quarter of the Southwest Quarter of said Section 16;

Thence South 13 degrees, 51 minutes and 13 seconds East leaving said East-West centerline 190.89 feet to a 5/8" iron pin;

Thence South 39 degrees, 36 minutes and 49 seconds East 178.82 feet to a 5/8" iron pin;

Thence South 77 degrees, 05 minutes and 03 seconds East 445.01 feet;

Thence South 67 degrees, 53 minutes and 55 seconds East 396.82 feet;

Thence South 61 degrees, 07 minutes and 42 seconds East 203.46 feet;

Thence South 02 degrees, 50 minutes and 43 seconds West 371.31 feet;

Thence South 23 degrees, 42 minutes and 47 seconds East 218.28 feet to a 5/8" iron pin;

Thence South 56 degrees, 41 minutes and 24 seconds West 183.98 feet to a 5/8" iron pin;

Thence South 16 degrees, 51 minutes and 03 seconds West 726.74 feet to a 5/8" iron pin;

Thence South 07 degrees, 39 minutes and 40 seconds West 521.09 feet to a 5/8" iron pin;

Thence South 43 degrees, 59 minutes and 52 seconds West 459.22 feet to a 5/8" iron pin;

Thence South 63 degrees, 24 minutes and 36 seconds West 139.00 feet to a 5/8" iron pin;

Thence South 63 degrees, 58 minutes and 50 seconds West 410.26 feet to the West line of the Northeast Quarter of the Northwest Quarter of said Section 21, from which a 5/8" iron pin bears North 63 degrees, 58 minutes and 50 seconds East 48.67 feet;

Thence North 01 degree, 45 minutes and 05 seconds East along said West line 495.31 feet to a 5/8" iron pin marking the Southwest Corner of the Southeast Quarter of the Southwest Quarter of said Section 16;

Thence North 00 degrees, 28 minutes and 50 seconds East leaving said West line and along the West line of said Quarter-Quarter Section 1315.68 feet to a 5/8" iron pin marking the Northwest Corner of said Quarter-Quarter Section;

Thence North 88 degrees, 35 minutes and 31 seconds West leaving said West line and along the South line of the Northwest Quarter of the Southwest Quarter of said Section 16 a distance of 1298.83 feet to a 5/8" iron pin marking the Southeast Corner of the Northeast Quarter of the Southeast Quarter of said Section 17;

Thence North 87 degrees, 54 minutes and 50 seconds West leaving said South line and along the South line of said Quarter-Quarter Section 1293.52 feet to a 5/8" iron pin on the East right-of-way of Missouri Route "A";

Thence North 05 degrees 33 minutes and 10 seconds West along said right-of-way 669.95 feet to a 5/8" iron pin;

Thence South 88 degrees, 05 minutes and 06 seconds East leaving said right-of-way 1375.51 feet to a 5/8" iron pin on the line common to said Sections 16 & 17;

Thence North 01 degree, 28 minutes and 48 seconds East along said common Section line 650.13 feet to the **Point of Beginning**, containing 114.8 Acres, more or less, with the above described

being subject to easements and rights-of-way of record or not of record, if any. As per survey #2018-005449 of Doug Walker, Missouri Professional Land Surveyor #2014000200 during September of 2018.

Tract 2

A tract of land lying in Section 16, Township 51 North, Range 14 West, Howard County, Missouri and being more fully described as follows to-wit:

Beginning at a found iron pin marking the Southwest Corner of the Southeast Quarter of the Northwest Quarter of said Section 16;

Thence North 01 degree, 18 minutes and 03 seconds East along the West line of said Quarter-Quarter Section 1352.59 feet to a found iron pin marking the Northwest Corner of said Quarter-Quarter Section;

Thence North 88 degrees, 54 minutes and 51 seconds West leaving said West line and along the South line of the Northwest Quarter of the Northwest Quarter of said Section 341.07 feet to a 5/8" iron pin;

Thence North 00 degrees, 24 minutes and 28 seconds East leaving said South line 526.44 feet to the centerline of Howard County Route #128, from which a 5/8" iron pin bears South 0 degrees, 24 minutes and 28 seconds West 35.00 feet;

Thence South 48 degrees, 44 minutes and 23 seconds East along said centerline 431.95 feet;

Thence South 55 degrees, 09 minutes and 25 seconds East along said centerline 141.48 feet;

Thence South 69 degrees, 46 minutes and 42 seconds East along said centerline 93.33 feet;

Thence North 85 degrees, 47 minutes and 48 seconds East along said centerline 75.26 feet;

Thence South 89 degrees, 04 minutes and 05 seconds East along said centerline 93.38 feet;

Thence South 75 degrees, 01 minutes and 44 seconds East along said centerline 123.20 feet;

Thence South 72 degrees, 20 minutes and 08 seconds East along said centerline 365.02 feet;

Thence South 73 degrees, 42 minutes and 31 seconds East along said centerline 367.03 feet;

Thence South 79 degrees, 11 minutes and 46 seconds East along said centerline 135.30 feet;

Thence South 85 degrees, 55 minutes and 20 seconds East along said centerline 185.53 feet;

Thence South 85 degrees, 10 minutes and 38 seconds East along said centerline 186.94 feet;

Thence South 77 degrees, 26 minutes and 46 seconds East along said centerline 113.47 feet;

Thence South 71 degrees, 43 minutes and 10 seconds East along said centerline 163.30 feet to the centerline of Moniteau Creek;

Thence South 35 degrees, 43 minutes and 37 seconds West leaving said County Route centerline and along said creek centerline 117.34 feet;

Thence South 76 degrees, 48 minutes and 30 seconds West along said centerline 83.50 feet;

Thence North 72 degrees, 23 minutes and 23 seconds West along said centerline 162.03 feet;

Thence South 39 degrees, 29 minutes and 35 seconds West along said centerline 79.99 feet;

Thence South 18 degrees, 34 minutes and 55 seconds West 122.59 feet;

Thence South 04 degrees, 49 minutes and 27 seconds West along said centerline 205.31 feet;

Thence South 19 degrees, 25 minutes and 09 seconds West along said centerline 84.70 feet;

Thence South 37 degrees, 45 minutes and 01 second West along said centerline 157.29 feet;

Thence South 12 degrees, 31 minutes and 19 seconds East along said centerline 318.51 feet;

Thence South 45 degrees, 52 minutes and 47 seconds East along said centerline 446.97 feet;

Thence South 23 degrees, 00 minutes and 57 seconds East along said centerline 169.33 feet;

Thence South 08 degrees, 09 minutes and 20 seconds East along said centerline 235.82 feet;

Thence South 19 degrees, 22 minutes and 54 seconds West 315.98 feet;
Thence South 50 degrees, 14 minutes and 14 seconds West along said centerline 171.04 feet;
Thence South 77 degrees, 42 minutes and 34 seconds West along said centerline 358.42 feet;
Thence South 01 degree, 20 minutes and 22 seconds West along said centerline 92.70 feet;
Thence South 82 degrees, 59 minutes and 11 seconds West leaving said centerline 134.43 feet to a 5/8" iron pin;
Thence North 23 degrees, 42 minutes and 47 seconds West 218.28 feet;
Thence North 02 degrees, 50 minutes and 43 seconds East 371.31 feet;
Thence North 61 degrees, 07 minutes and 42 seconds West 203 .46 feet;
Thence North 67 degrees, 53 minutes and 55 seconds West 396.82 feet;
Thence North 77 degrees, 05 minutes and 03 seconds West 445.01 feet to a 5/8" iron pin;
Thence North 39 degrees, 36 minutes and 49 seconds West 178.82 feet to a 5/8" iron pin;
Thence North 13 degrees, 51 minutes and 13 seconds West 190.89 feet to the **Point of Beginning**, containing 80.9 Acres, more or less, with the above described being subject to that portion now being used for public road purposes and subject to other easements and rights-of-way of record or not of record, if any. As per survey #2018-005449 of Doug Walker, Missouri Professional Land Surveyor #2014000200 during September of 2018.

Tract 3

A tract of land lying in Section 16, Township 51 North, Range 14 West, Howard County, Missouri and being more fully described as follows to-wit

Commencing at a found iron pin marking the Southwest Corner of the Southeast Quarter of the Northwest Quarter of said Section 16;

Thence North 01 degree, 18 minutes and 03 seconds East along the West line of said Quarter-Quarter Section 1352.59 feet to a found iron pin marking the Northwest Corner of said Quarter-Quarter Section;

Thence North 88 degrees, 54 minutes and 51 seconds West leaving said West line and along the South line of the Northwest Quarter of the Northwest Quarter of said Section 341.07 feet to a 5/8" iron pin;

Thence North 00 degrees, 24 minutes and 28 seconds East leaving said South line 526.44 feet to the centerline of Howard County Route #128, from which a 5/8" iron pin bears South 00 degrees, 24 minutes and 28 seconds West 35.00 feet;

Thence South 48 degrees, 44 minutes and 23 seconds East along said centerline 431.95 feet;

Thence South 55 degrees, 09 minutes and 25 seconds East along said centerline 141.48 feet;

Thence South 69 degrees, 46 minutes and 42 seconds East along said centerline 93.33 feet;

Thence North 85 degrees, 47 minutes and 48 seconds East along said centerline 75.26 feet;

Thence South 89 degrees, 04 minutes and 05 seconds East along said centerline 93.38 feet;

Thence South 75 degrees, 01 minutes and 44 seconds East along said centerline 123.20 feet;

Thence South 72 degrees, 20 minutes and 08 seconds East along said centerline 365.02 feet;

Thence South 73 degrees, 42 minutes and 31 seconds East along said centerline 367.03 feet;

Thence South 79 degrees, 11 minutes and 46 seconds East along said centerline 135.30 feet;

Thence South 85 degrees, 55 minutes and 20 seconds East along said centerline 185.53 feet;

Thence South 85 degrees, 10 minutes and 38 seconds East along said centerline 186.94 feet;

Thence South 77 degrees, 26 minutes and 46 seconds East along said centerline 113.47 feet;

Thence South 71 degrees, 43 minutes and 10 seconds East along said centerline 163.30 feet to the centerline of Moniteau Creek and the True Point of Beginning;

Thence South 71 degrees, 33 minutes and 28 seconds East leaving said creek centerline and along said County Route centerline 377.55 feet;
Thence South 67 degrees, 12 minutes and 00 seconds East along said centerline, 1142.37 feet;
Thence South 57 degrees, 44 minutes and 48 seconds East along said centerline 150.27 feet;
Thence South 57 degrees, 31 minutes and 06 seconds East along said centerline 104.67 feet to a point from which a 5/8" iron pin bears South 01 degree, 35 minutes and 24 seconds West 30.50 feet;
Thence South 01 degree, 35 minutes and 24 seconds West leaving said centerline 736.99 feet to a 5/8" iron pin;
Thence South 79 degrees, 11 minutes and 28 seconds West 634.31 feet to a 5/8" iron pin;
Thence South 62 degrees, 27 minutes and 59 seconds West 122.44 feet to a 5/8" iron pin;
Thence South 62 degrees, 43 minutes and 28 seconds West 111.05 feet to the centerline of said Moniteau Creek, from which a 5/8" iron pin bears North 62 degrees, 43 minutes and 28 seconds East 49.04 feet;
Thence North 45 degrees, 52 minutes and 47 seconds West along said centerline 446.97 feet;
Thence North 12 degrees, 31 minutes and 19 seconds West along said centerline 318.51 feet;
Thence North 37 degrees, 45 minutes and 01 second East along said centerline 157.29 feet;
Thence North 19 degrees, 25 minutes and 09 seconds East along said centerline 84.70 feet;
Thence North 04 degrees, 49 minutes and 27 seconds East along said centerline 205.31 feet;
Thence North 18 degrees, 34 minutes and 55 seconds East along said centerline 122.59 feet;
Thence North 39 degrees, 29 minutes and 35 seconds East along said centerline 79.99 feet;
Thence South 72 degrees, 23 minutes and 23 seconds East along said centerline 162.03 feet;
Thence North 76 degrees, 48 minutes and 30 seconds East along said centerline 83.50 feet;
Thence North 35 degrees, 43 minutes and 37 seconds East along said centerline 117.34 feet to the **Point of Beginning**, containing 26.7 Acres, more or less, with the above described being subject to that portion now being used for public road purposes and subject to other easements and rights-of-way of record or not of record, if any. As per survey #2018-005449 of Doug Walker, Missouri Professional Land Surveyor #2014000200 during September of 2018.

Tract 4

A tract of land lying in Sections 15 & 16, Township 51 North, Range 14 West, Howard County, Missouri and being more fully described as follows to-wit:

Commencing at the Quarter Corner common to said Sections 15 & 16;

Thence South 01 degree, 16 minutes and 45 seconds West along the line common to said Sections 15 & 16 a distance of 212.34 feet to a 5/8" iron pin marking the True Point of Beginning;

Thence continue South 01 degree, 16 minutes and 4 seconds West along said common Section line 758.13 feet to a 5/8" iron pin;

Thence South 80 degrees, 57 minutes and 51 seconds West leaving said common Section line 248.24 feet to a 5/8" iron pin;

Thence North 73 degrees, 09 minutes and 19 seconds West 560.36 feet to a 5/8" iron pin;

Thence North 81 degrees, 52 minutes and 40 seconds West 258.32 feet to a 5/8" iron pin;

Thence South 83 degrees, 05 minutes and 51 seconds West 330.39 feet to a 5/8" iron pin;

Thence South 54 degrees, 55 minutes and 36 seconds West 78.35 feet to a 5/8" iron pin;

Thence South 41 degrees, 01 minute and 22 seconds West 291.88 feet to a 5/8" iron pin;

Thence South 2 degrees, 22 minutes and 51 seconds West 165.02 feet to a 5/8" iron pin;
Thence North 89 degrees, 13 minutes and 23 seconds West 365.77 feet to the centerline of Moniteau Creek, from which a 5/8" iron pin bears South 89 degrees, 13 minutes and 23 seconds East 70.00 feet;

Thence North 56 degrees, 14 minutes and 18 seconds West along said centerline 219.58 feet;

Thence South 65 degrees, 20 minutes and 21 seconds West along said centerline 207.24 feet;

Thence South 79 degrees, 58 minutes and 13 seconds West along said centerline 116.82 feet;

Thence North 36 degrees, 24 minutes and 49 seconds West along said centerline 161.95 feet;

Thence North 01 degree, 20 minutes and 22 seconds East along said centerline 92.70 feet;

Thence North 77 degrees, 42 minutes and 34 seconds East along said centerline 358.42 feet;

Thence North 50 degrees, 14 minutes and 14 seconds East 171.04 feet;

Thence North 19 degrees, 22 minutes and 54 seconds East along said centerline 315.98 feet;

Thence North 08 degrees, 09 minutes and 20 seconds West along said centerline 235.82 feet;

Thence North 23 degrees, 00 minutes and 57 seconds West along said centerline 169.33 feet to a point from which a 5/8" iron pin bears North 62 degrees, 43 minutes and 28 seconds East 49.04 feet;

Thence North 62 degrees, 43 minutes and 28 seconds East leaving said centerline 111.05 feet;

Thence North 62 degrees, 27 minutes and 59 seconds East 122.44 feet to a 5/8" iron pin;

Thence North 79 degrees, 11 minutes and 28 seconds East 634.31 feet to a 5/8" iron pin;

Thence North 01 degree, 35 minutes and 24 seconds East 736.99 feet to the centerline of Howard County Route# 128, from which a 5/8" iron pin bears South 01 degree, 35 minutes and 24 seconds West 30.50 feet;

Thence South 64 degrees, 05 minutes and 47 seconds East along said centerline 235.65 feet;

Thence South 71 degrees, 30 minutes and 56 seconds East along said centerline 239.09 feet;

Thence South 80 degrees, 50 minutes and 04 seconds East along said centerline 156.76 feet;

Thence North 81 degrees, 57 minutes and 48 seconds East along said centerline 291.89 feet

Thence North 75 degrees, 54 minutes and 44 seconds East along said centerline 298.76 feet;

Thence North 86 degrees, 17 minutes and 44 seconds East along said centerline 116.33 feet;

Thence South 73 degrees, 49 minutes and 31 seconds East along said centerline 92.20 feet;

Thence South 57 degrees, 45 minutes and 32 seconds East along said centerline 95.02 feet;

Thence South 48 degrees, 24 minutes and 38 seconds East along said centerline 235.07 feet;

Thence South 40 degrees, 30 minutes and 47 seconds East along said centerline 162.15 feet;

Thence South 27 degrees, 35 minutes and 02 seconds East along said centerline 127.79 feet;

Thence South 29 degrees, 13 minutes and 06 seconds East along said centerline 181.91 feet;

Thence South 48 degrees, 11 minutes and 09 seconds East along said centerline 111.43 feet to a point from which a 5/8" iron pin bears South 70 degrees, 40 minutes and 04 seconds West 35.00 feet;

Thence South 70 degrees, 40 minutes and 04 seconds West leaving said centerline 366.91 feet to a 5/8" iron pin;

Thence South 54 degrees, 47 minutes and 33 seconds West 381.42 feet to the **Point of Beginning**, containing 85.8 Acres, more or less, with the above described being subject to that portion now being used for public road purposes and subject to other easements and rights-of-way of record or not of record, if any. As per survey #2018-005449 of Doug Walker, Missouri Professional Land Surveyor #2014000200 during September of 2018.

Tract 5

All that portion of the following described land lying North of County Road 128:

80 Acres, the North Half of the Southwest Quarter;

80.00 Acres, the East Half of the Northwest Quarter;

40.00 Acres, the Northwest Quarter of the Northwest Quarter;

72 Acres, the West part of the Northwest Quarter;

7 Acres, the Northwest corner of the Southeast Quarter all in Section 16, Township 51, Range 14, Howard County, Missouri.

35 Acres, the South part of the Southwest Quarter;

3 Acres, the Southwest part of the West Half of the Southeast Quarter, all in Section 9, Township 51, Range 14, all in Howard County, Missouri.

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

CIVIL COVER SHEET

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Western District of Missouri.

The completed cover sheet must be saved as a pdf document and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff(s):

First Listed Plaintiff:

United States of America;
County of Residence: Howard County

Defendant(s):

First Listed Defendant:

NINE PARCELS OF REAL PROPERTY IN
HOWARD COUNTY, MISSOURI;
County of Residence: Howard County

County Where Claim For Relief Arose: Howard County

Plaintiff's Attorney(s):

Assistant United States Attorney Anthony M Brown
(United States of America)
United States Attorney's Office
901 East St. Louis St., Suite 500
Springfield, Missouri 65806
Phone: (417)-575-8167
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Defendant's Attorney(s):

Basis of Jurisdiction: 1. U.S. Government Plaintiff

Citizenship of Principal Parties (Diversity Cases Only)

Plaintiff: N/A

Defendant: N/A

Origin: 1. Original Proceeding

Nature of Suit: 690 All Other Forfeiture and Penalty Actions

Cause of Action: Forfeit property to the United States for violations of Title 18, United States Code Sections 981(a)(1)(A) and (a)(1)(C).

Requested in Complaint

Class Action: Not filed as a Class Action

Monetary Demand (in Thousands):

Jury Demand: No

Related Cases: Is NOT a refiling of a previously dismissed action

Signature: /s/ Anthony M. Brown

Date: 5/28/2024

If any of this information is incorrect, please close this window and go back to the Civil Cover Sheet Input form to make the correction and generate the updated JS44. Once corrected, print this form, sign and date it, and submit it with your new civil action.