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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 12 CV 50153
)	
HAVE FAITH IN MONEY, A QUARTER)	
HORSE AND 394 OTHER QUARTER)	
HORSES AND 21 EMBRYOS, ALL)	
IDENTIFIED ON ATTACHMENT A, 13)	
SADDLES IDENTIFIED ON)	
ATTACHMENT B, AND FROZEN)	
STALLION SEMEN IDENTIFIED ON)	
ATTACHMENT C)	
)	
Defendants.)	<u>JURY TRIAL DEMANDED</u>

VERIFIED AMENDED COMPLAINT FOR FORFEITURE¹

The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, for its verified complaint against the above-named defendant properties, alleges in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure as follows:

1. This amended complaint for forfeiture is verified by the attached affidavit of Patrick J. Garry, Special Agent with the Federal Bureau of Investigation (“FBI”), which is fully incorporated herein.

¹On May 1, 2012, the United States filed a verified complaint for forfeiture of 311 quarter horses. Since that date, the United States has discovered additional horses and other assets subject to forfeiture. Accordingly, the United States is now filing this amended complaint for forfeiture.

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Jurisdiction and Venue

2. This is an *in rem* forfeiture action brought pursuant to Title 18, United States Code, Section 981(a)(1)(C), for forfeiture of Have Faith in Money, a quarter horse and 395 other quarter horses and 21 embryos, all identified on Attachment A, 13 saddles, identified on Attachment B, and frozen stallion semen from 8 horses, identified in Attachment C, (“defendant properties”), as properties which constitute and are derived from proceeds obtained from violations of Title 18, United States Code, Section 1343.

3. This court has *in rem* jurisdiction over the defendant properties pursuant to Title 28, United States Code, Sections 1355(b)(1)(A) and (d), as the acts giving rise to the forfeiture occurred within the Northern District of Illinois.

4. Venue is proper under 28 U.S.C. § 1395(b) because the acts giving rise to the forfeiture occurred in this district.

Statutory Authority

5. This *in rem* forfeiture action is brought pursuant to Title 18, United States Code, Section 981(a)(1)(C).

Specific Allegations

6. From approximately 1983 to April 17, 2012, Rita A. Crundwell (“Crundwell”) was employed as the Comptroller for the City of Dixon. As Comptroller, Crundwell handled all of the finances for the City of Dixon.

7. At least as early as 1999, Crundwell controlled an account ending in the numbers 9530 at a financial institution in Dixon (hereinafter "9530 account"). Bank records for the 9530 account for the time period of July 2006 through March 2012 show that the primary account holder

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for the 9530 account is the City of Dixon, with a joint account holder listed as "RSCDA." Monthly bank statements for the 9530 account list the account holder as "City of Dixon, P.O. Box 386, RSCDA, Dixon, Illinois 61021-0386," and the checks written on the 9530 account list the account holder as "R.S.C.D.A., C/O Rita Crundwell, P.O. Box 482, Dixon, IL 61021."

8. Additional records from Fifth Third Bank and US Bank show that the City of Dixon maintained the following accounts between September 2011 and March 2012: 1) Fifth Third Bank "Corporate Fund" account ending in the numbers 2563 ("2563 account"); 2) Fifth Third Bank "Sales Tax Fund" account ending in the numbers 8373 ("8373 account"); 3) Midland States Bank "Capital Project Fund" account ending in the numbers 0066 ("0066 account"); 4) Midland States Bank "Motor Fuel Fund" account ending in the numbers 3675 ("3675 account"); 5) US Bank Money Market account ending in the numbers 1128 ("1128 account"); and 6) Fifth Third Bank "Capital Development Fund" account ending in the number 7503 ("7503 account").

9. Records obtained from US Bank show that between September of 2011 and February of 2012, approximately \$2,783,912 of tax funds were electronically deposited into the 1128 account, including:

\$1,315,828	Municipal 1% Share of Sales Tax
\$456,575	Local Share of Income Tax
\$398,285	Non-Home Rule Sales Tax
\$264,709	Personal Property Replacement Tax
\$198,017	Motor Fuel Tax
\$108,288	Local Share of State Use Tax
\$42,210	Simplified Mun. Telecommunications Tax

10. US Bank records show that the above distributions were derived from a local government investment pool called The Illinois Funds. The total of \$2,783,912 represents the City

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of Dixon's share of distributions made by the State of Illinois from September of 2011 through February of 2012.

11. Between September of 2011 and February of 2012, Crundwell, in her capacity as Comptroller for the City of Dixon, caused \$3,039,000 to be wired out of the 1128 account into other City of Dixon accounts, as follows:

\$1,788,000	Wires into 7503 Account
\$796,000	Wires into 2563 Account
\$255,000	Wires into 8373 Account
\$200,000	Wires into 3675 Account

12. In order to complete the wire transfers, Crundwell called bank employees of US Bank in Springfield, Illinois and requested the amounts of the wire transfers and directed that the funds be transferred to the specified accounts.

13. Upon receiving Crundwell's instructions for the wire transfers, US Bank employees transferred \$2,839,000 in funds from the US Bank account at the Federal Reserve Bank in Saint Paul, Minnesota to the Fifth Third Bank accounts at the Federal Reserve Bank in Cincinnati, Ohio for credit to the accounts ending in the numbers 7503, 2563, and 8373, all held in the name of the City of Dixon at Fifth Third Bank in Dixon, Illinois.

14. Upon receiving Crundwell's instructions for the wire transfers, US Bank employees transferred \$200,000 in funds from the US Bank account at the Federal Reserve Bank in Saint Paul, Minnesota to the Midland States Bank account at the Federal Reserve Bank in Effingham, Illinois for credit to the account ending in the numbers 3675 held in the name of the City of Dixon at Midland States Bank in Dixon, Illinois.

15. Between September of 2011 and January of 2012, Crundwell in her capacity as Comptroller for the City of Dixon, wrote checks payable to "Capital Development Fund", and

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caused the checks to be deposited into the 7503 Account. These checks were drawn from various City of Dixon accounts as follows:

\$950,000	Checks drawn from 2563 Account
\$120,000	Checks drawn from 8373 Account
\$174,253	Checks drawn from 0066 Account

16. Fifth Third Bank and US Bank records show that Crundwell, in her capacity as Comptroller for the City of Dixon, caused a total of \$2,522,253, in wires and checks, to be deposited into the 7503 account between September of 2011 and January of 2012.

17. Between September of 2011 and March of 2012, Crundwell, in her capacity as Comptroller for the City of Dixon, wrote 19 checks drawn on the 7503 account, amounting to \$3,558,000.00 and payable to "Treasurer." Crundwell caused all of these checks to be deposited into the 9530 account.

18. Most of the City of Dixon funds that were transferred into the 9530 account were used by Crundwell to purchase personal assets including vehicles and to pay for Crundwell's personal expenses as well as for the expenses related to her horse business.

19. Fifth Third Bank records for the 9530 account show that of the approximately \$3,558,000 in City of Dixon funds a total of \$3,311,860.25 was withdrawn from that account through checks and online withdrawals. Of the \$3,311,860.25 in withdrawals, only \$74,274.27 was related to the City of Dixon's operations.

20. Fifth Third Bank records show that, from July of 2006 through March of 2012, Crundwell caused \$29,421,310.00 to be deposited from the Capital Development Account into the 9530 Account. Crundwell also caused \$794,977.43 to be deposited from various checks made

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payable to the "City of Dixon." During that time, the 9530 account received \$20,216.08 in interest deposits.

21. In total, Crundwell deposited \$30,236,503.51 in funds belonging to the City of Dixon into the 9530 account between July 2006 through March 2012.

22. Bank records from Fifth Third Bank show that Crundwell used the 9530 account to pay for personal expenses as well as expenses related to her horse business including purchasing saddles and other equipment for her horses. During the period of July 2006 through March 2012, Crundwell paid \$30,173,009.02 in checks, online payments, and other withdrawals. Of those items, only six checks, made payable to the "Sewage Fund" and "Corporate Fund," totaling \$153,745.93, related to business conducted by the City of Dixon.

23. Illinois Secretary of State Records show that Rita Crundwell is the only member of RC Quarter Horses, LLC, a limited liability company with a principal office located at 1679 US Route 52, Dixon, Illinois 61021. An online press release dated December 15, 2011 on the website "GoHorseShow.com" (http://gohorsheshow.com/article/Columns/Sudden_Scoop/Announcing_the_2012_RC_Quarter_Horses_Production_Sale_at_MeriJ/36655), states "On July 28, 2012, over 75 horses owned by Rita Crundwell sell at her RC Quarter Horses ranch in Dixon, Illinois." The press release further states that the sale will take place at "Rita's ranch, RC Quarter Horses , 1556 Red Brick Rd , Dixon, IL 61021" and that the sale will be managed by "Jim McKillips, MERI-J RANCH - PERCOTT Company, LLC."

24. On April 17, 2012, Crundwell was arrested by the FBI in Dixon, Illinois based on a federal criminal complaint filed in the Northern District of Illinois, Western Division, case number 12 CR 50027 that charged her with wire fraud, in violation of Title 18, United States Code, Section

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1343. FBI Special Agents interviewed Crundwell in Dixon the day of her arrest. During that interview Crundwell stated, among other things, that:

a. Crundwell owns between 350 and 400 horses. All of the horses have identification chips in their necks and she kept a list of the horses on a "thumbdrive" (electronic storage device).

b. Crundwell used proceeds she wrongfully obtained through the RSCDA account to pay for the upkeep of all the horses.

c. Crundwell also used proceeds she wrongfully obtained through the RSCDA account to purchase some of the horses.

25. During a search of Crundwell's office at City Hall, 121 W. Second Street, in Dixon, Illinois on April 17, 2012, among the items seized was an electronic storage device, also known as a thumbdrive.

26. The thumbdrive contained a list of the horses owned by Crundwell as well as their locations.

27. The records contained on the thumbdrive as well as records obtained from the American Quarter Horse Association show that Rita A. Crundwell is the owner of the horses and embryos listed in Attachment A.

28. The saddles listed in Attachment B were seized by FBI agents from the Meri-J Ranch in Beloit, Wisconsin on April 17, 2012 and are owned by Crundwell.

29. The frozen stallion semen listed Attachment C is owned by Crundwell.

30. For the reasons stated herein and in the attached affidavit, there is probable cause to believe that the property listed in Attachments A, B and C is subject to forfeiture pursuant to Title

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18, United States Code, Section 981(a)(1)(C), as property which constitutes and is derived from proceeds traceable to violations of Title 18, United States Code, Section 1343.

WHEREFORE, the United States of America requests:

A. That the defendant properties be proceeded against for forfeiture and condemnation, that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed;

B. That the court adjudge and decree that the defendant properties be forfeit to the United States and disposed of according to law; and

C. The United States requests that any trial be before a jury.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By: /s/ JOSEPH C. PEDERSEN
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State of Illinois)
) SS
County of Winnebago)

AFFIDAVIT

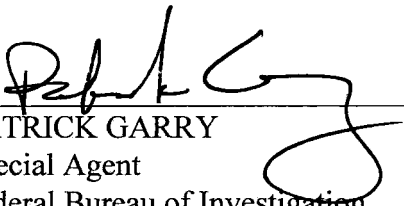
I, Patrick Garry, having first been duly sworn, upon oath, deposes and states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed for approximately six years. As a Special Agent with FBI, I investigate criminal violations relating to white collar crime, including mail, wire, and bank fraud.

2. I have read the complaint in this matter and the facts alleged are true and correct to the best of my knowledge and belief based upon my own personal knowledge as well as information I have received from other agents, persons and documents, and it does not include each and every fact known to me concerning this investigation but is submitted for the limited purpose of establishing a basis to believe the property identified is subject to forfeiture.

3. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on the 25th of May, 2012, in Rockford, Illinois.

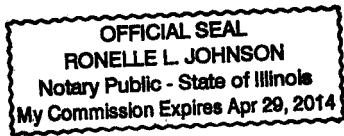


PATRICK GARRY
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me
this 25th day of May 2012.



NOTARY PUBLIC



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		ATTACHMENT A		
CHIP NUMBER	NAME	COLLAR	LOCATION	
094 544 597	CERTAINLY A BLAZE		Arizona	
052 270 358	A FORMAL DUTY	W101	Beloit, Wisconsin	
079 787 352	A FORMAL DUTY - UNNAMED FOAL	NA	Beloit, Wisconsin	
075 521 327	ACACIAN SONG	O358	Beloit, Wisconsin	
079 521 840	ACACIAN SONG - UNNAMED FOAL	NA	Beloit, Wisconsin	
985170000476882	ACCOOL ROCKSTAR	W341	Beloit, Wisconsin	
053 025 351	ACOOLEST	N/A	Beloit, Wisconsin	
985140000523977	ANEXECUTE	W214	Beloit, Wisconsin	
985140000448159	ANNIE WILL BE GOOD	W183	Beloit, Wisconsin	
075 524 539	CARDS FOR ASSETS	O348	Beloit, Wisconsin	
079 773 530	CARDS FOR ASSETS - UNNAMED FOAL	NA	Beloit, Wisconsin	
985170000571688	CASH FOR TOUCHDOWNS	W339	Beloit, Wisconsin	
094 543 315	CHEX OUT MY LOPE	N/A	Beloit, Wisconsin	
145 225 511A	ELITE DETAIL	W115	Beloit, Wisconsin	
NO CHIP	ELITE DETAIL - UNNAMED FOAL	NA	Beloit, Wisconsin	
052 353 827	EXECUTE	N/A	Beloit, Wisconsin	
985121014908625	EXECUTE PRETTY	W306	Beloit, Wisconsin	
Not Found	FABULOUS MOXIE	W195	Beloit, Wisconsin	
985170000478109	FRUIT NINJA BE	W363	Beloit, Wisconsin	
052 114 894	GAILE'S HOPE	W518	Beloit, Wisconsin	
075 369 520	GAILE'S HOPE - UNNAMED FOAL	NA	Beloit, Wisconsin	
985170000595589	GOOD DUTY	W333	Beloit, Wisconsin	
135 457 374A	GOOD I WILL BE	N/A	Beloit, Wisconsin	
145 253 366A	GRACEFUL DETAIL	W119	Beloit, Wisconsin	

84591846	GRACEFUL DETAIL - UNNAMED FOAL	NA	Beloit, Wisconsin
985140000460418	HEZA COOL TD	W408	Beloit, Wisconsin
145 249 523A	HOPE IM FABULOUS	N/A	Beloit, Wisconsin
061 077 860	IE SUMTHING	N/A	Beloit, Wisconsin
096 790 076	IE TAKEAGOODLOOKATME	W229	Beloit, Wisconsin
096 613 616	IM ABOUT ACOOLEST	W148	Beloit, Wisconsin
135 245 116A	IM MONEY TOO	W129	Beloit, Wisconsin
NO CHIP	IM MONEY TOO - UNNAMED FOAL	NA	Beloit, Wisconsin
449 520 378	IM OUT AND ABOUT	W130	Beloit, Wisconsin
79536257	IM OUT AND ABOUT - UNNAMED FOAL	NA	Beloit, Wisconsin
985140000554963	IM SACREDS TOUCHDOWN	W257	Beloit, Wisconsin
985140000515495	IM THE SHOWMAN	W430	Beloit, Wisconsin
	IMA MTK	W355	Beloit, Wisconsin
076 792 052	INVEST IN A HOT STAR	N/A	Beloit, Wisconsin
145 321 751A	IRON ENTERPRISE	N/A	Beloit, Wisconsin
145 234 692A	LADY SARA	W138	Beloit, Wisconsin
79371879	LADY SARA - UNNAMED FOAL	NA	Beloit, Wisconsin
985140000459619	LIKE TO BE NOTICED	W293	Beloit, Wisconsin
985140000394628	LOOKIN FOR ROMANCE	G542	Beloit, Wisconsin
052 294 014	ME THUMPTIN SPECIAL	W143	Beloit, Wisconsin
79612584	ME THUMPTIN SPECIAL - UNNAMED FOAL	NA	Beloit, Wisconsin
051 627 059	MISTERS LADY RIDER	W145	Beloit, Wisconsin
75375308	MISTERS LADY RIDER - UNNAMED FOAL		Beloit, Wisconsin
094 557 347	MONEY'S MOXIE	N/A	Beloit, Wisconsin
077 080 639	MR TOUCHDOWN KID	N/A	Beloit, Wisconsin
985121014520248	MTK BUSY OPERATOR	W303	Beloit, Wisconsin

094 542 566	MTK PICKED ME	W123	Beloit, Wisconsin
985140000508542	MYSTIC INVITATION	N/A	Beloit, Wisconsin
985140000445341	NATURALLY GRACEFUL	N/A	Beloit, Wisconsin
077 021 606	NI FABULOUS	N/A	Beloit, Wisconsin
NO CHIP (MARE)	NO NAME (BROODMARE - COLLAR G308)	G308	Beloit, Wisconsin
NO CHIP (MARE)	NO NAME (BROODMARE - COLLAR G328)	G328	Beloit, Wisconsin
Chip 075263888	NO NAME (BROODMARE - COLLAR G328) - UNNAMED FOAL	NA	Beloit, Wisconsin
Chip 079775283	NO NAME (BROODMARE - COLLAR G308) - UNNAMED FOAL	NA	Beloit, Wisconsin
094 550 843	PACKIN JEWELS	W289	Beloit, Wisconsin
135 554 723A	RAISE A HOT STAR	W152	Beloit, Wisconsin
Chip 07955079	RAISE A HOT STAR - UNNAMED FOAL	NA	Beloit, Wisconsin
052 356 053	RAISE YOUR IRONS	W191	Beloit, Wisconsin
079 614 288	RAISE YOUR IRONS - UNNAMED FOAL	NA	Beloit, Wisconsin
094 543 035	SACREDS EXECUTIONIST	W275	Beloit, Wisconsin
145 225 790A	SCORCHING HOT	W160	Beloit, Wisconsin
079 370 359	SCORCHING HOT - UNNAMED FOAL	NA	Beloit, Wisconsin
985121014651451	SHES ENTERPRISING	W112	Beloit, Wisconsin
135 564 352A	SHES PROMISCUOUS	W184	Beloit, Wisconsin
079 779 518	SHES PROMISCUOUS - UNNAMED FOAL	NA	Beloit, Wisconsin
985121015277511	SHEZAN IMPULSIVE ZIP	W512	Beloit, Wisconsin
079 769 789	SHEZAN IMPULSIVE ZIP - UNNAMED FOAL	NA	Beloit, Wisconsin

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075 269 559	SPARKLES ON A FUDGE	O405	Beloit, Wisconsin
053 065 300	SUM HOT BLAZE	W166	Beloit, Wisconsin
053 081 577	SUM IRON	W167	Beloit, Wisconsin
145 272 731A	SUM IRON FOR ME	W033	Beloit, Wisconsin
98512105115099	UN FORGETTABLE	N/A	Beloit, Wisconsin
076 820 848	WF TWO THUMBS UP	N/A	Beloit, Wisconsin
985121018300738	WHITELESS	W346	Beloit, Wisconsin
985170000552881	WILLY GOOD GURL	W367	Beloit, Wisconsin
Not Found	WILLY SIZZLE	W361	Beloit, Wisconsin
985140000529608	WILLYTAKEAGOODLOOK	W265	Cleburne, Texas
985140000535185	ROSES N CHAMPAGNE	W158	Collinsville, Texas
135157117A	(no name)	B256	Collinsville, Texas
985140000532463	(no name) (IM About Class/Acoolest Touchdown Recip)	B247	Collinsville, Texas
985140000523853	(No name) (Telusives Touchdown/Acoolest Recip)	G381	Collinsville, Texas
985140000475098	(no name) (Telusives Touchdown/Touchdown Cali Recip)	G005	Collinsville, Texas
985140000414194	ACOOLEST TOUCHDOWN	No ID	Collinsville, Texas
No Chip	APPALOOSA (Roses and Champagne/Execute Recip)	G233	Collinsville, Texas
52031519	ATTEST	196	Collinsville, Texas
985140000413589	COOSUNDAY	116	Collinsville, Texas
985140000507739	CSU	G542	Collinsville, Texas
No Chip	embryo of Attest/Touchdowncali (Recipient horse owned by DH)	Y838/HR1215	Collinsville, Texas
No Chip	embryo of Msclassystyle/Mrtouchdownkid (Recipient horse owned by DH)	Y883/HR1187	Collinsville, Texas
No Chip	embryo of Msclassystyle/Mrtouchdownkid (Recipient horse owned by DH)	Y885/PE108	Collinsville, Texas

No Chip	embryo of Phenomenalms/Execute (Recipient horse owned by DH)	Y379/PE845	Collinsville, Texas
No Chip	embryo of PhenomenalMs/Mrtouchdownkid (Recipient horse owned by DH)	Y155/PE950	Collinsville, Texas
No Chip	embryo of RBTouchofmoxie/Goodwillbe (Recipient horse owned by DH)	Y822/PE862	Collinsville, Texas
No Chip	embryo of Sacredsterra/Acoolest (Recipient horse owned by DH)	G212/PE1003	Collinsville, Texas
No Chip	embryo of Imthebest/Goodwillbe (Recipient horse owned by DH)	Y884/PE382	Collinsville, Texas
No Chip	embryo of Imthebest/Investinahotstar (Recipient horse owned by DH)	Y823/HR1299	Collinsville, Texas
No Chip	embryo of Msclassystyle/Acoolesttouchdown (Recipient horse owned by DH)	Y877/PE378	Collinsville, Texas
No Chip	embryo of Phenomenalms/Execute (Recipient horse owned by DH)	B516/PE343	Collinsville, Texas
No Chip	embryo of Pickmeplease/Acoolest (Recipient horse owned by DH)	B238/PE136	Collinsville, Texas
No Chip	embryo of Pickmeplease/Acoolesttouchdown (Recipient horse owned by DH)	Y865/HR1152	Collinsville, Texas
No Chip	embryo of Pickmeplease/Acoolesttouchdown (Recipient horse owned by DH)	Y864/PE855	Collinsville, Texas
No Chip	embryo of Potentialtwo/Goodwillbe (Recipient horse owned by DH)	Y826/HR1092	Collinsville, Texas
No Chip	embryo of PrettyHotandsonny/Investinahotstar (Recipient horse owned by DH)	G502/PE236	Collinsville, Texas

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No Chip	embryo of Roses and Champagne/Execute (Recipient horse owned by DH)	Y863/PE785	Collinsville, Texas
145325386A	embryo of Sacred Sierra/Execute (Recipient horse owned by RE)	B234/PE541	Collinsville, Texas
No Chip	embryo of Sacred Sierra/Acoolest (Recipient horse owned by DH)	G314/PE1002	Collinsville, Texas
No Chip	embryo of She Scores/Mrtouchdownkid (Recipient horse owned by DH)	Y101/HR1339	Collinsville, Texas
No Chip	embryo of Shescores/Cowboysstyle (Recipient horse owned by DH)	Y829/PE785	Collinsville, Texas
985121015278888	EXECUTEASORE	No ID	Collinsville, Texas
985140000447515	IEXECUTECLASS	No ID	Collinsville, Texas
61073885	IMABOUTCLASS	193	Collinsville, Texas
985170001031806	IMTHEBEST	125	Collinsville, Texas
145162347A	JEWELS BY TIFFANY	18	Collinsville, Texas
No Chip	MISSCLASSYSTYLE	139	Collinsville, Texas
No Chip	PE041 (Jewels by Tiffany/Cowboy Style)	G507	Collinsville, Texas
985140000458229	PE099 (IM About Class/Acoolest Touchdown Recip)	G327	Collinsville, Texas
985140000258138	PE100 (Pizzazzy Lady/Acoolest Touchdown Recip)	G052	Collinsville, Texas
985140000536527	PE493 (I Execute Class/Acoolest Touchdown Recip)	B250	Collinsville, Texas
145326232A	PE603 Recip	G014	Collinsville, Texas
76786098	PHENOMENAL MISS	132	Collinsville, Texas
No Chip	PICKMEPLEASE	No ID	Collinsville, Texas
No Chip	PIZZAZZYLADY	No ID	Collinsville, Texas
52304621	POTENTIALTWO	151	Collinsville, Texas

No Chip	PRETTYHOTANDSUNNY	28	Collinsville, Texas
No Chip	PUTONMYLUCKYSHOES	132	Collinsville, Texas
61117259	RBTOUCHOHMOXIE	154	Collinsville, Texas
985140000460587	Recipient Horse and embryo of Coosunday/Execute	G462	Collinsville, Texas
985140000535185	ROSESANDCHAMPAGNE	158	Collinsville, Texas
145334634A	SACREDSIERRA	198	Collinsville, Texas
49353349	SHESCORES	194	Collinsville, Texas
145217797A	SHEZATELUSIVEKID	197	Collinsville, Texas
51868879	TELUSIVE TOUCHDOWN	511	Collinsville, Texas
985140000532568	A STATUESQUE	W435	Dixon, Illinois
145346286A	A THUMBS UP DETAIL/TUCKER	NO COLLAR	Dixon, Illinois
52359519	ABSOLUTE IRON ((0523359512))	W103	Dixon, Illinois
985170000364006	ACOO LADE	W356	Dixon, Illinois
	ACOOLEST PICK	W175	Dixon, Illinois
51622374	AINT I A NATURAL	W104	Dixon, Illinois
985170000595051	AINT I A WILLY	W338	Dixon, Illinois
985170001050110	AINT I ACOOLEST	W454	Dixon, Illinois
52853851	ALL THUMBS UP	W106	Dixon, Illinois
985170000479849	ANGRY BIRDS	W366	Dixon, Illinois
94547891	ANOTHER TOUCHDOWN	W107	Dixon, Illinois
075 350 542	ANOTHER TOUCHDOWN - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000371085	ANOTHER TOUCHDOWN RECIP	B265	Dixon, Illinois
9.8514E+14	ANOTHER TOUCHDOWN RECIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000536482	APATRICK	W441	Dixon, Illinois
985140000537700	ATTEST RECIP	G446	Dixon, Illinois
075 343 586	ATTEST RECIP-UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000534055	B ENDLESS LEGS	W445	Dixon, Illinois
985140000538192	BATHHOUSE BOOTY	W415	Dixon, Illinois

985140000502976	BIG GIRLS RULE RECIP	B257	Dixon, Illinois
075 517 279	BIG GIRLS RULE RECIP-UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000535485	BLAKES PATRIOTIC DOLL	W108	Dixon, Illinois
094532608	BOB BOB BARANN	W133	Dixon, Illinois
075376575	BOB BOB BARANN - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000505183	BOTOX N LEATHER	W413	Dixon, Illinois
051792840	BRIOS HOT	W109	Dixon, Illinois
985170000950482	CACTUS JUNCTION	W470	Dixon, Illinois
050383342	CALL ME SCARLETT	W508	Dixon, Illinois
985121014884512	CANT ESCAPE THAT	W177	Dixon, Illinois
075524842	CANT ESCAPE THAT - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
052115551	CATHYS MARECEDES	W111	Dixon, Illinois
No Chip	CATHYS MARECEDES - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
049524074	CHILL OUT BOY	NO COLLAR	Dixon, Illinois
985140000533651	CLASSY TOUCHDOWN	W212	Dixon, Illinois
050570377	COMPLETELY NATURAL	W113	Dixon, Illinois
075519352	COMPLETELY NATURAL - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
094539291	COOLEST SCORES	W114	Dixon, Illinois
985170001078074	COOLEST SCORES - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985121008871862	COPE WITH THIS	W307	Dixon, Illinois
985170000953516	DANS FLYING SAUCER	W188	Dixon, Illinois
985121018269297	DROPIT LIKE UR HOT	W467	Dixon, Illinois
985170000458649	EINSTEINS IN MADRID	W347	Dixon, Illinois
985140000527609	EXECUTE STYLE	W401	Dixon, Illinois
985121013944630	EXECUTES JEWEL	W259	Dixon, Illinois
	EXECUTIE	W308	Dixon, Illinois

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985140000445131	EXSCARLETTTO	W406	Dixon, Illinois
985140000535419	EXTRA CUTE	W422	Dixon, Illinois
985170000596094	EXTRA PICKS	W400	Dixon, Illinois
985140000509252	FIRST LEAGUE	W446	Dixon, Illinois
985140000394771	FORMAL I WILL BE	W448	Dixon, Illinois
985170000596849	GEORGIA GOODBAR	W121	Dixon, Illinois
985121009672787	GOOD GIRLS ONLY	W208	Dixon, Illinois
985121018745276	GOOD B OTHERWISE	W344	Dixon, Illinois
985140000533374	GOOD GIRLS ONLY - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170000337370	GOOD HOT PIE	W354	Dixon, Illinois
985170000357185	GOOD HOT RAISENS-BARRY	W349	Dixon, Illinois
985121018264349	GOOD IRONS	W327	Dixon, Illinois
985121014546010	GOOD RIDIN	W317	Dixon, Illinois
985170000362154	GOODIN HOT	W359	Dixon, Illinois
094538338	GOODLOOKIN BLAZE	W118	Dixon, Illinois
075514521	GOODLOOKIN BLAZE - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000513951	GOODNESS KNOWS	W410	Dixon, Illinois
985170000981166	GURLS LUV TO PARTY	W461	Dixon, Illinois
985121018031829	GURLS N CURLS	W325	Dixon, Illinois
052044331	HAPPYROCK ANNIE	W120	Dixon, Illinois
94527054	HAVE FAITH IN MONEY	W262	Dixon, Illinois
053809066	HEIDI	G192	Dixon, Illinois
985170000488816	HEZA EXECUTE KID	W402	Dixon, Illinois
052269838	HH ILL BE GREAT	W533	Dixon, Illinois
075352591	HH ILL BE GREAT - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170001049372	HOMESTYLE COOKIE	W168	Dixon, Illinois
075369347	HOMESTYLE COOKIE - UNNAMED FOAL	NO COLLAR	Dixon, Illinois

985170000946304	HONOLULU COOL	W466	Dixon, Illinois
985140000459992	HOT N MASTERFUL	W407	Dixon, Illinois
98512101394563	HOT REASONS	W318	Dixon, Illinois
135356290A	HOT SIZZLIN VERSION	W122	Dixon, Illinois
985121014609546	HOT TO RAISE	W312	Dixon, Illinois
	HOT TO TROT STAR	No Collar	Dixon, Illinois
985170000447126	I FOUND A PENNY	W117	Dixon, Illinois
985170001076723	I AM FABULOUS	W457	Dixon, Illinois
985140000461624	IE IN AWE (98514000061624 per Reg)	W409	Dixon, Illinois
985170000949843	IE JAZZ	W473	Dixon, Illinois
053318850	IE MAGICAL	W173	Dixon, Illinois
075515882	IE MAGICAL - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
075516310	IE MARECEDES - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
053383361	IE MARECEDES (053383361 per Reg)	W319	Dixon, Illinois
053833257	IE MOXIE	NO COLLAR	Dixon, Illinois
061328628	IE ON THE RAISE	W192	Dixon, Illinois
075 518 611	IE ON THE RAISE - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000463553	IE STAR SHIP	W431	Dixon, Illinois
985170000919878	IM ABOUT COOL	W463	Dixon, Illinois
985121014891876	IM ABOUT IT	W305	Dixon, Illinois
052525584	IM ALL NATURAL	W126	Dixon, Illinois
051775284	IM ALL THUMBS	W127	Dixon, Illinois
079620099	IM ALL THUMBS - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000523443	IM IN AWE	W424	Dixon, Illinois
145173532A	IM INVITED TO ZIP	W128	Dixon, Illinois
075517826	IM INVITED TO ZIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois

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985170000951830	IMPERIAL PALACE	W477	Dixon, Illinois
052036878	IMPERIAL REASON	W006	Dixon, Illinois
096775827	INVEST IN A NATURAL	W146	Dixon, Illinois
985170000595021	INVITED TO THE PARTY	W105	Dixon, Illinois
053098358	JDZ MADISON COUNTY	W134	Dixon, Illinois
075340794	JDZ MADISON COUNTY - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
060611805	JDZS HOT	W135	Dixon, Illinois
145215190A	JUST CALL ME DIXIE	W136	Dixon, Illinois
051610554	JUSTA KID CLU	W131	Dixon, Illinois
985140000505418	KENNE RAISEM	W403	Dixon, Illinois
985170000596695	KIND WILLY	W342	Dixon, Illinois
985170000952832	KRISTAL KREEK	W460	Dixon, Illinois
985170001032234	KRYMSUN N KLOVER	W459	Dixon, Illinois
052033639	LACIOUS	W137	Dixon, Illinois
135616655A	MAGIC HOTROD	W142	Dixon, Illinois
075340297	MAGIC HOTROD - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170001033320	MAN FROM LARIME	W456	Dixon, Illinois
985121008885511	ME MYSELF AND I	W186	Dixon, Illinois
	MELLOW BREW	W144	Dixon, Illinois
985170000974628	MONEY IS HOT	W475	Dixon, Illinois
985140000350495	MONEYS MOXIE RECIP	B263	Dixon, Illinois
985170001032576	MONEYS MOXIE RECIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
052297847	MOXIES SHADOW/FRENCHY	NO COLLAR	Dixon, Illinois
985170000573743	MR ACOOLEST	W336	Dixon, Illinois
985121014625512	MTK BOB BARANN	W316	Dixon, Illinois
096827262	MTK FOREVER COOLEST	W163	Dixon, Illinois
985121014911053	MTK KOKOMO WAY	W322	Dixon, Illinois
985140000512788	MTK RAZAMATAZ	W429	Dixon, Illinois

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985140000537419	MTK SAC MASTER	W417	Dixon, Illinois
985121018075156	MTK SCORES MORE	W345	Dixon, Illinois
	MY NAME IN NEON	B247	Dixon, Illinois
985140000525925	MY SOULS INIT	W412	Dixon, Illinois
052082546	NI THUMB ONE	W147	Dixon, Illinois
075265581	NI THUMB ONE - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170001067395	NO HOOPS TO JUMP	W451	Dixon, Illinois
075516859	NO NAME - RECIP	G326	Dixon, Illinois
985170000981603	OBSERVATION POINT	W478	Dixon, Illinois
985170000954083	ONE POSH KID	W476	Dixon, Illinois
985121018261204	OPTIONAL ATTIRE	W330	Dixon, Illinois
985121018001963	OUT N ABOUT GIRL	W353	Dixon, Illinois
985140000479663	PASS THE FAITH	W507	Dixon, Illinois
075374019	PASS THE FAITH - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
075359589	PHENOMENAL MS RECIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985121015255272	PHENOMENOL MS RECIP	G259	Dixon, Illinois
985140000312989	PICK ME PLEASE - RECIP.	G376	Dixon, Illinois
075348530	PICK ME PLEASE - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985121017991125	PICK POLLY	W331	Dixon, Illinois
985140000460550	PIZZAZZACUTE	W404	Dixon, Illinois
985170001031512	PIZZAZZY LADY RECIP	G324	Dixon, Illinois
NO CHIP	PIZZAZZY LADY RECIP	B506	Dixon, Illinois
NO CHIP	PIZZAZZY LADY RECIP	B505	Dixon, Illinois
14530952A	PIZZAZZY LADY RECIP	G329	Dixon, Illinois
075344052	PIZZAZZY LADY RECIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
079612024	PIZZAZZY LADY RECIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois

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075523352	PIZZAZZY LADY RECIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
135233140A	POTENTIAL FORTUNE	W149	Dixon, Illinois
079630116	POTENTIAL FORTUNE - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
049583546	POTENTIAL TOUCH	W150	Dixon, Illinois
075518091	POTENTIAL TOUCH - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170000950762	RAGWEED RALLY	W465	Dixon, Illinois
9851400000525750	RAINDROPS N RAINBOS	R509	Dixon, Illinois
NO CHIP	RAINDROPS N RAINBOS - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170000561967	RAISEN KEN	W337	Dixon, Illinois
147573153A	RB TOUCH OF MOXIE-RECIP	B240	Dixon, Illinois
135267196A	RC TILTED PALACE	NONE	Dixon, Illinois
985170000357276	REAL GOOD REASON	W360	Dixon, Illinois
135309645A	REALLY COOLEST	W155	Dixon, Illinois
075344038	REALLY COOLEST - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985121015279185	REASON TO BE GOOD	W326	Dixon, Illinois
NO CHIP	RECIP/MY NAME IN NEON	B357	Dixon, Illinois
985170000918667	RED BRICK ROAD	W468	Dixon, Illinois
052032512	REFLECTIONS OF MR	W314	Dixon, Illinois
079633095	REFLECTIONS OF MR - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
135554622A	REGAL HONOR	W156	Dixon, Illinois
145333763A	REGALLY INVITED	W165	Dixon, Illinois
075525848	REGALLY INVITED - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000532735	RIOS MARECEDES	W418	Dixon, Illinois
985140000512908	ROCK HAPPY	W447	Dixon, Illinois
985170001069961	ROCKIN AND A REELIN	W458	Dixon, Illinois

985170000981470	ROLLOWED SPUR	W464	Dixon, Illinois
985170001029837	SCULPTURED IN IRON	W240	Dixon, Illinois
052261120	SECURE WITH CASH	W510	Dixon, Illinois
075514290	SECURE WITH CASH - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170000958609	SHDA PUTA RING ON IT	W471	Dixon, Illinois
053774013	SHE GOT LEGS	W162	Dixon, Illinois
145511495A	SHE SCORES - RECIP.	G317	Dixon, Illinois
075376789	SHE SCORES - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
075344039	SHE'S A TELUSIVE KID RECIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
053119776	SHE'S COOLEST	W202	Dixon, Illinois
985170001074515	SHE'S COOLEST - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
075337812	SHE'S PROMISCUOUS RECIP - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
145238117A	SHE'S PROMISCUOUS RECIP	G423	Dixon, Illinois
985140000538029	SHE'ZA TELUSIVE KID RECIP	G470	Dixon, Illinois
985140000525744	SHE'ZA TRIBUTAUNT	W414	Dixon, Illinois
075378321	SHEZCOPASETIC - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
052300316	SHEZCOPESETIC	W164	Dixon, Illinois
985140000473653	SIMPLE WAYS	W153	Dixon, Illinois
985170001081035	SIMPLE WAYS - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170001077940	SMOKEY IN THE GRASS	W453	Dixon, Illinois
98514000521298	SPITACULAR	W434	Dixon, Illinois
985140000515239	SPYDR SPY	W438	Dixon, Illinois
075363048	SUM BREEZE - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
98512015266705	SUM BREEZE (985121015266705 per reg)	W157	Dixon, Illinois
	SUM FOR ME	W199	Dixon, Illinois

985170001076450	SWAP YOUR RIDE	W452	Dixon, Illinois
985140000508533	SWIFT ALL THE TIME	O353	Dixon, Illinois
985140000458879	TETHER MY LEATHER	W421	Dixon, Illinois
985140000511866	TEXAS BREEZE	W172	Dixon, Illinois
051626318	THE MASTERFUL MISS	W187	Dixon, Illinois
985121015137795	THEBESTSUDDEN ASSET	W206	Dixon, Illinois
075271819	THEBESTSUDDENASSET - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985170000973933	THIS RIDERS HOT	W462	Dixon, Illinois
075517287	THUMBKINDA DEBUT - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
052274354	THUMBKINDA DEBUT (0522274351 per Reg)	W169	Dixon, Illinois
052286038	THUMIN UP A RIDE	W170	Dixon, Illinois
052095791	THUMPTIN JAZZY	W171	Dixon, Illinois
985140000398520	TNT RED	W178	Dixon, Illinois
985121018253922	TO BE REASONED WITH	W340	Dixon, Illinois
985140000397123	TOLLWAY WALTZ	W440	Dixon, Illinois
077039289	TOUCHDOWN SCARLET	W189	Dixon, Illinois
075362093	TOUCHDOWN SCARLETT - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
076819518	TOUCHED BY SECURITEE	W004	Dixon, Illinois
985170001077584	TOUCHING A RAINBOW	W140	Dixon, Illinois
985170001032506	TOUCHING A RAINBOW - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000444126	TRIBUTE SCORES	W419	Dixon, Illinois
985140000462414	TULIPS	W416	Dixon, Illinois
985140000509004	ULTIMATE TOOL (98514000509004 per Reg)	W437	Dixon, Illinois
985140000462970	UNFORGETTABLE DETAIL	W450	Dixon, Illinois
075376006	UNNAMED FOAL OF HAPPYROCK ANNIE	NO COLLAR	Dixon, Illinois

985170000966378	UP LOAD	W472	Dixon, Illinois
049324523	VAN VALLEY MR/BOB	NO COLLAR	Dixon, Illinois
135263396A	WEEKEND ODYSSEY	W176	Dixon, Illinois
075519818	WEEKEND ODYSSEY - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
985140000507705	WESTERN CALL GIRL	W432	Dixon, Illinois
985140000501548	WILL BE A NATURAL	W260	Dixon, Illinois
9851700001075280	WILL N KATE (985170001075289)	W455	Dixon, Illinois
985140000446833	WILL PASS THE FAITH	W442	Dixon, Illinois
985140000525763	WILLY DIVA	W443	Dixon, Illinois
985140000535036	WILLY IMPULSIVE	W427	Dixon, Illinois
985140000454439	WILLYS INVITATION	W281	Dixon, Illinois
985140000456742	ZAZZLE	W428	Dixon, Illinois
985140000515377	ZIPPED IN TIME	W203	Dixon, Illinois
075523326	ZIPPED IN TIME - UNNAMED FOAL	NO COLLAR	Dixon, Illinois
050 545 889	SUDDEN INSTINCT		Eldora, Iowa
985170000449950	DOODLE JUMP	W362	Fondulac, Wisconsin
985121014595278	HOTSUM MAN	W321	Fondulac, Wisconsin
985170000487418	JUST CALL WILLY	W365	Fondulac, Wisconsin
985121018242169	RAISE EM GOOD	W329	Fondulac, Wisconsin
096 635 119	RC WILL I BE GOOD	W232	Harwinton, Connecticut
	CAREFUL WHO U INVITE	W207	Horace, North Dakota
985170000358447	GOOD WILL MOXIE	W357	Horace, North Dakota
096 824 865	IE COPY		Horace, North Dakota
094 547 277	IE IBEAGOODONE	W238	Horace, North Dakota

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094 539 022	WILLY HAS POTENTIAL	W230	Horace, North Dakota
985170000597710	KID JEWELS	W343	Kentucky
985140000460172	LIPS ALOCKIN	W436	Mason, Michigan
094 541 551	ANEXECUTIONIST	W272	Michigan
985140000460183	RUNNING BACK FLASH	W425	Michigan
985121018256789	GOOD COUNTY	W350	Morrison, Florida
985121014630351	WILLYS BOX	W311	Morrison, Florida
985140000444274	WILLYS DUTY	W264	Morrison, Florida
	RED CARPET RITA	No collar	Ohio
985121014595910	GOOD WEEKEND	W315	Ottawa Lake, MI
985170000334779	I WILL BE BRIO	W352	Ottawa Lake, MI
985170000481384	KIT DELUCA	W368	Ottawa Lake, MI
985170000448373	MS MAE FLASH		Ottawa Lake, MI
985170000571868	PASS ME GOOD	W334	Ottawa Lake, MI
135 412 366A	AROOSTER		Pilot Point, Texas
985140000512695	SUM HOT SQUIGGLE	W426	Reddick, Florida
985140000536087	ROCK COUNTY KID	W444	Reddick, Florida
985140000222427	ACOOLEST TIFFANY	W253	Republic, Ohio
985140000518591	ILL BE A TOUCHDOWN	W278	Republic, Ohio
985140000444366	LEATHER N TAILS	W420	Republic, Ohio
985140000397785	SHEZASCARLETTWINDER	W423	Republic, Ohio
985121015116572	STYLIN CLASSY	W324	Republic, Ohio
985121013947048	SHES EXECUTE	W302	Roberta, Georgia
094 543 365	WILLYS HOT HOT HOT	W236	Roberta, Georgia
	SCULPTURED IN IRON		Sycamore, Illinois
985140000499058	I WILL BE HOT	W182	Talala, Oklahoma
094 542 890	TOUCHDOWN CALI	W509	Talala, Oklahoma
985140000465055	WILLY DONE DUNIT	W279	Talala, Oklahoma
985170000354400	GOOD GOOD MOLLY	W355	

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Saddle Maker	Description
Phil Harris	5320560236 Western Show Saddle 10/05
Phil Harris	5321151020 Western Show Saddle 05/11
Phil Harris	5320461882 Western Show Saddle 10/04
Phil Harris	5320251935 Western Show Saddle 12/01
Phil Harris	5320151665 Western Show Saddle 05/01
Phil Harris	5329650640 Western Show Saddle 05/97
Phil Harris	5320150920 Western Show Saddle 11/01
Phil Harris	5320050392 Western Show Saddle 12/99
Phil Harris	5320351308 Western Show Saddle 12/02
Phil Harris	5320351309 Western Show Saddle 12/02
Blue Ribbon	BR09371. Western Show Saddle 2009
Blue Ribbon	BR11240 Western Show Saddle 2011
Blue Ribbon	BR11242 Western Show Saddle 2011

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STALLION	STRAWS		DOSES	
Iron Enterprise	741	(589)	92.625	(73.625)
Mr. Touchdown Kid	707	(689)	88.375	(86.125)
WF Two Thumbs Up	242	(0)	30.25	(0)
Acoolest	415	(415)	51.875	(51.875)
Invest In A Hot Star	578	(578)	72.25	(72.25)
Good I Will Be	733	(498)	91.625	(62.25)
NI Fabulous	371	(78)	46.375	(9.75)
Execute	844	(793)	105.5	(99.125)
Notes:				
8 Straws = 1 Dose				
(Parentheses denotes post thaw motility rate > 30%)				

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	NO. 12-CV-50153
)	
v.)	Judge Philip G. Reinhard
)	
HAVE FAITH IN MONEY, A)	Magistrate Judge P. Michael
QUARTER HORSE AND 310 OTHER)	Mahoney
QUARTER HORSES, ALL HORSES)	
IDENTIFIED ON ATTACHMENT A,)	
)	
Defendants.)	

PETITION TO INTERVENE

Petitioners, BROCK ALLEN and KRISTI ALLEN, doing business as Allen Equine (collectively “the Allens”), HARTMAN EQUINE PREPRODUCTION CENTER, P.A. (“HERC”), and A. BARRY WOOD, DVM (“Wood”), state as follows for their Petition to Intervene pursuant to Federal Rule of Civil Procedure 24:

1. Petitioners are people and entities responsible for providing feed, care and veterinarian services to certain of the horses identified in Attachment A to the United States Verified Complaint for Forfeiture.

2. Specifically, Petitioners the Allens are responsible for boarding and caring for each of the horses identified in Attachment A which are located in Collinsville, Texas as well as several of the Exhibit A horse incorrectly identified as being outside of the state of Texas (herein “the Texas Horses”). Petitioners HERC and Wood are licensed veterinarians who have provided veterinary care to the Texas Horses.

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3. In some cases, Petitioners have been boarding, breeding, and otherwise caring for certain of the Texas Horses for a number of years prior to the indictment Rita A. Crundwell.

4. In the course of boarding and caring for the Texas horses, Petitioners have incurred a variety of costs, resulting in liens under the following sections of Chapter 70 of the Texas Property Code:

- (A) Sec. 70.010 Liens for Veterinary Care Charges for Large Animals; and
- (B) Sec. 70.003 Stable Keeper's, Garageman's, Pasturer's, and Cotton Ginner's Liens

5. Moreover, the Texas Horses are ostensibly the subject of the Court's Post-Complaint Protective Order, which, among other things, compels Petitioners to take all reasonable precautions to prevent the destruction or diminution in value of the Texas Horses, subjecting the Petitioners to substantial ongoing costs and expenses. Petitioners have been attempting to coordinate the care of the Texas Horses with the relevant federal authorities since being notified of the indictment Rita A. Crundwell, and have been fully cooperative in helping work out a plan going forward for the continued care and well-being of the Texas Horses.

6. As of the date of this Petition, the value of the Petitioners' liens is in excess of \$150,000.

7. Under Federal Rule of Civil Procedure 24(a)(2), Petitioners claim an interest relating to the Texas Horses and are situated such that disposing of this forfeiture action in their absence will as a practical matter impair or impede the Petitioners' ability to satisfy their

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statutory liens and protect their interests. Petitioners are therefore entitled to intervention as of right.

8. In addition to the above-described grounds for intervention, Petitioners incorporate herein the proposed Claim attached hereto as Exhibit A, which pleading Petitioners intend to file in this matter under Supplemental Rule of Civil Procedure G(5)(a).

WHEREFORE, Petitioners respectfully request that the Court enter an order granting them leave to intervene in this matter.

Intervening Petitioners BROCK ALLEN and
KRISTI ALLEN, doing business as ALLEN
EQUINE, HARTMAN EQUINE
PREPRODUCTION CENTER, P.A., and A.
BARRY WOOD, DVM,

By WilliamsMcCarthy LLP & GANCI LLP

By: _____ /s/ Joel M. Huotari

Joel M. Huotari
John J. Holevas
WilliamsMcCarthy LLP
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(815) 987-8900

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CERTIFICATE OF LAWYER

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, the undersigned certifies that on May 21, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system.

/s/ Joel M. Huotari

Joel M. Huotari
John J. Holevas
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

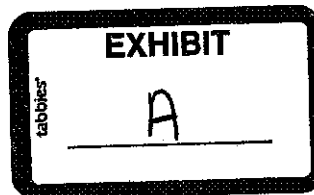
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	NO. 12-CV-50153
)	
v.)	Judge Philip G. Reinhard
)	
HAVE FAITH IN MONEY, A)	Magistrate Judge P. Michael
QUARTER HORSE AND 310 OTHER)	Mahoney
QUARTER HORSES, ALL HORSES)	
IDENTIFIED ON ATTACHMENT A,)	
)	
Defendants.)	

CLAIM ON BEHALF OF INTERVENERS

Interveners, BROCK ALLEN and KRISTI ALLEN, doing business as Allen Equine (collectively “the Allens”), HARTMAN EQUINE PREPRODUCTION CENTER, P.A. (“HERC”), and A. BARRY WOOD, DVM (“Wood”), state as follows for their Claim pursuant to Supplemental Rule of Civil Procedure G(5)(a):

1. Interveners claim an interest in and to the following twenty-one horses (herein “the Texas Horses”), which are among those identified in Attachment A to the United States’ Verified Complaint for Forfeiture:

Registered Name:	Registration Number:	Microchip Number:
1. Acoolest Touchdown	5156059	n/a
2. Attest	3807455	052 031 519
3. Execute A Score	5274854	n/a
4. I Execute Class	5038882	985 140 000 447 515
5. Im About Class	4372334	061 073 885
6. Im the Best	5073917	985 170 001 103 806
7. Jewels By Tiffany	4362379	145 162 347 A
8. Ms Classy Style	4169327	n/a



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9. Phenomenal Ms	4298091	076 786 098
10. Pick Me Please	2781329	n/a
11. Pizzazzy Lady	4748783	n/a
12. Potential Two	4573130	052 304 621
13. Pretty Hot and Sonny	3862249	n/a
14. Putnonmyluckyshoes	4011104	n/a
15. RB Touch of Moxie	X0569407	061 117 259
16. Sacred Sierra	3615432	145 334 634A
17. She Scores	3920460	049 353 349
18. Sheza Telusive Kid	3821604	145 217 797A
19. Teluzives Touchdown	4526941	051 868 879
20. Coosunday	330482	985 140 000 413 589
21. Roses N Champagne	235161	985 140 000 535 185

2. Interveners have been boarding, breeding, and otherwise caring for and providing veterinary care to certain of the Texas Horses for a period of years prior to the indictment of Rita A. Crundwell.

3. In the course of boarding, caring for, and providing veterinary care to the Texas Horses, Interveners have incurred a variety of costs, resulting in liens under the following sections of Chapter 70 of the Texas Property Code:

- (A) Sec. 70.010 Liens for Veterinary Care Charges for Large Animals; and
- (B) Sec. 70.003 Stable Keeper's, Garageman's, Pasturer's, and Cotton Ginner's Liens

4. Moreover, the Texas Horses are ostensibly the subject of the Court's Post-Complaint Protective Order, which, among other things, compels certain parties to take all reasonable precautions to prevent the destruction or diminution in value of the Texas Horses. Interveners are aware of the Post-Complaint Protective Order and are incurring ongoing costs and expenses in keeping the Texas Horses in proper care.

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5. As of the date of this Claim, the value of the Interveners' liens is in excess of \$150,000.

WHEREFORE, Interveners respectfully request that any forfeiture of the Texas Horses be expressly conditioned upon the United States' obligation to fully honor the Interveners' liens upon the Texas Horses.

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Interveners BROCK ALLEN and KRISTI ALLEN,
doing business as ALLEN EQUINE, HARTMAN
EQUINE PREPRODUCTION CENTER, P.A., and
A. BARRY WOOD, DVM,

By WilliamsMcCarthy LLP & GANCI LLP

By: _____ /s/ Joel M. Huotari _____

Joel M. Huotari
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Allen, Texas 75013
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CERTIFICATE OF LAWYER

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, the undersigned certifies that on May 21, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system.

/s/ Joel M. Huotari

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

FILED
MAY 25 2012
MAGISTRATE JUDGE P. MICHAEL MAHONEY
United States District Court

UNITED STATES OF AMERICA,)
)
Plaintiff,)

v.)

No. 12 CV 50153

HAVE FAITH IN MONEY, A QUARTER)
HORSE AND 394 OTHER QUARTER)
HORSES AND 21 EMBRYOS, ALL)
IDENTIFIED ON ATTACHMENT A, 13)
SADDLES IDENTIFIED ON)
ATTACHMENT B, AND FROZEN)
STALLION SEMEN IDENTIFIED ON)
ATTACHMENT C)

Defendants.)

POST-COMPLAINT PROTECTIVE ORDER

This matter having come before this Court on the motion of the United States of America for entry of a protective order pursuant to Title 18, United States Code, Section 983(j)(1)(A), which provides courts with jurisdiction to enter restraining orders and take such other action in connection with any property or other interest subject to forfeiture to ensure its availability for forfeiture; and

IT APPEARING TO THE COURT THAT:

The United States has filed an amended civil forfeiture complaint with respect to the above-captioned defendant properties;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED PURSUANT TO 18 U.S.C. § 983(j)(1)(A) THAT the defendant properties are hereby restrained in the manner described below:

DEFINITIONS

For purposes of this order, the following definitions apply:

1. “Defendant properties” refers to the 395 quarter horses and 21 embryos, all identified on Attachment A, 13 saddles, identified on Attachment B, and frozen stallion semen from 8 horses, identified in Attachment C of the May 25, 2012, amended civil forfeiture complaint.

2. “Potential claimants” refers to the owner of the defendant properties, Rita A. Crundwell, her successors, assigns, officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with her who receive actual notice of this order by personal service or otherwise.

PROHIBITED ACTIVITIES

IT IS THEREFORE ORDERED that potential claimants are enjoined from:

- 1) Entering into any agreement to sell the defendant properties during the pendency of this forfeiture action, unless the District Court orders the defendant properties sold, with the net proceeds to be deposited into an interest-bearing account as the substitute *res*, held in the custody and control of the United States Marshal Service.
- 2) Transferring or disposing of, by any means, the defendant properties. However, if any of the defendant properties have been transferred or disposed of by any means, potential claimants shall account to the Court for their disposition. Further, this Order applies with equal force and effect to restrain the transfer or disposition of the proceeds from said

properties.

- 3) Selling, assigning, pledging, distributing, giving away, encumbering, or otherwise participating in the disposal of, or removal from, the jurisdiction of this Court, any part or interest in the defendant properties, without prior approval of the Court upon notice to the United States and an opportunity for the United States to be heard, except as specified in this Order.
- 4) Knowingly allowing any illegal activity to occur with regard to the defendant properties during the pendency of this civil forfeiture action.

MAINTAINING THE DEFENDANT PROPERTIES

IT IS FURTHER ORDERED that, during the pendency of this civil forfeiture action, potential claimants are ordered to do the following with respect to the defendant properties:

- 1) Potential claimants shall take all reasonable precautions to prevent the destruction or diminution in value of the defendant properties.
- 2) Potential claimants shall neither take, nor knowingly permit or aid and abet, any action to destroy, damage, waste, dispose of, or transfer the defendant properties, without authority of the Court, for the purpose of impairing or defeating the Court's continuing *in rem* jurisdiction over the defendant properties, in violation of 18 U.S.C. § 2232(b).

IT IS FURTHER ORDERED that, during the pendency of this civil forfeiture action, the United States may take all necessary steps to ensure the health and well-

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being of the defendant properties.

MONITORING

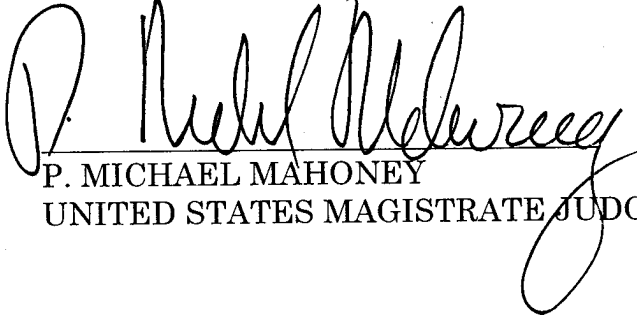
IT IS FURTHER ORDERED that the United States may monitor potential claimants' compliance with this Order by all lawful means available.

JURISDICTION

This Court shall retain jurisdiction of this matter for all purposes.

The terms of this order shall remain in full force and effect until judgment is rendered on the civil forfeiture complaint filed with respect to the defendant properties, or further order of the Court.

SO ORDERED this th25 day of May, 2012


P. MICHAEL MAHONEY
UNITED STATES MAGISTRATE JUDGE