

S. LANE TUCKER
United States Attorney

RYAN D. TANSEY
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
101 12th Avenue, Room 310
Fairbanks, Alaska 99701
Phone: (907) 456-0245
Fax: (907) 456-0577
Email: Ryan.Tansey@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
JARED WILKES POST,)
a/k/a, "JMFP Inc.,")
"Chris_Taylor68,") No. 4:22-cr-00004-RRB-SAO
"Jaredpost32,")
"Haitian.cowboy," and,)
LEVI DYLAN SKULSTAD,)
a/k/a, "Levi Cashino,")
"youngcashino,")
)
Defendant.)
_____)

**UNOPPOSED MOTION FOR ALTERNATIVE
VICTIM NOTIFICATION UNDER 18 U.S.C. § 3771(d)(2)**

Mot. for Alt. Victim Notice Page 1 of 4
United States v. Post et al
4:22-cr-00004-RRB-SAO

The United States of America respectfully moves this Court, pursuant to Title 18, United States Code, Section 3771(d)(2), for authorization to employ the victim notification procedures described below, in lieu of those prescribed by section 3771(a), (b) and (c), on the grounds that the number of crime victims in this case makes it impracticable to accord all of the crime victims the rights described in subsection 3771(a).

The Crimes Victims' Rights Act ("the Act"), codified at 18 U.S.C. § 3771, provides certain rights to victims in federal criminal proceedings. Among these rights is the right to "reasonable, accurate, and timely notice" of public court proceedings. 18 U.S.C. § 3771(a). The Act requires "[o]fficers and employees of the Department of Justice and other departments and agencies of the United States engaged in the detection, investigation and prosecution of crime make their best efforts to see that crime victims are notified of, and accorded, the rights described in subsection [3771](a)," 18 U.S.C. § 3771(c)(1), and it instructs the Court to "ensure that the crime victim is afforded" those rights. 18 U.S.C. § 3771(b). The Act defines a crime victim as "a person directly and proximately harmed as a result of the commission of a Federal offense . . ." 18 U.S.C. § 3771(e). Importantly, the Act recognizes that for crimes involving multiple victims, the Court has discretion to adopt procedures to accord victim rights without unduly interfering with the criminal proceedings. Thus, 18 U.S.C. §3771(d)(2) provides:

In a case where the court finds that the number of crime victims makes it impracticable to accord all of the crime victims the rights described in subsection (a), the court shall fashion a reasonable procedure to give effect to this chapter that does not unduly complicate or prolong the proceedings.

The Act places no limitations on the alternative procedures which a Court may fashion other than that the procedures be reasonable to effectuate the Act and that they not unduly complicate or prolong the proceedings. *Id.*

Here, the defendants, Jared Wilkes Post and Levi Dylan Skulstad, have been charged with a years-long Conspiracy to Commit Bank Fraud and Wire Fraud, Bank Fraud, Wire Fraud, Aggravated Identity Theft, and Conspiracy to Commit Money Laundering. The indictment charges them with fraudulently obtaining a total of at least \$500,000 from Alaska USA and other federally insured banking institutions. The defendants additionally stole checks and used banking information from countless other victims to further the scheme. The government estimates hundreds of potential victims, many of which are not identifiable or knowable by the government.

The number of victims makes compliance with the notification requirements outlined in section 3771(a), (b) and (c) impracticable. Neither the government nor the Court has the resources to accord all of the victims in this case the notice required by subsection 3771(a).

Therefore, due to the large number of victims in this case, the government intends to direct potential victims to the U.S. Attorney's Office website where all required notices will be posted: <https://www.justice.gov/usao-ak/case-updates>. The government will also issue a press release within a reasonable amount of time after the Court grants this motion informing individuals who believe they may be victims to access the U.S. Attorney's Office website for more information.

CONCLUSION

Based on the foregoing, the government requests the Court grant the motion for alternative victim notification procedures.

Counsel for the United States contacted attorneys for defendant, and neither oppose this motion.

RESPECTFULLY SUBMITTED this 1st day of September, 2022, in Fairbanks, Alaska.

S. LANE TUCKER
United States Attorney

/s/ Ryan D. Tansey
RYAN D. TANSEY
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically on all counsel of record via the CM/ECF system.

/s/ Ryan Tansey
Office of the U.S. Attorney