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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SHERRI PAPINI,

15 Debtor.
16

17 KINNEY & KINNEY ATTORNEYS AT
18 LAW,

19 Garnishee.
20

Case No.

**APPLICATION FOR
WRIT OF GARNISHMENT**

Criminal Case No. 2:22CR00070 WBS

21 The United States, in accordance with the Federal Debt Collection Procedures Act of 1990
22 (“FDCPA”), 28 U.S.C. § 3205(b)(1), requests that the Clerk of the United States District Court issue a
23 Writ of Garnishment against property up to and including the amount of \$340,221.23, held by Kinney &
24 Kinney Attorneys At Law (“Garnishee”) in which Sherri Papini (“Debtor”) has an interest. Upon
25 information and belief, Debtor has a substantial nonexempt interest in property, as defined in 28 U.S.C.
26 § 3002(12), that is in the possession, custody, or control of Garnishee.

27 On or about September 19, 2022, Debtor was sentenced in criminal case number 2:22CR00070
28 and ordered to pay a statutory assessment of \$200.00 and restitution of \$309,902.23 (“Judgment

1 Amount”). As of March 22, 2024, Debtor owes \$309,292.23. Despite the United States’ demand for
2 payment, made more than 30 days before the date of this Application, Debtor has failed to satisfy the
3 debt. No interest accrues on this debt. The United States also seeks to recover the statutorily authorized
4 ten percent (10%) litigation surcharge of the unpaid Judgment Amount (\$30,929.00) pursuant to 28
5 U.S.C. § 3011(a). The total amount sought by this garnishment action is \$340,221.23.

6 Debtor’s social security number is ***-**- 7044. Debtor’s last known address is 31051
7 Woolridge Drive, Shingletown, CA 96088.

8 When the Court sentenced Debtor and ordered Debtor to pay restitution and/or a fine, a lien
9 arose in favor of the United States on all property and rights to property as if the liability “were a
10 liability for a tax assessed under the Internal Revenue Code of 1986,” pursuant to 18 U.S.C. § 3613(c).

11 Accordingly, the United States respectfully requests that the Clerk issue a Writ of Garnishment
12 in accordance with the FDCPA.

13 Respectfully submitted,

14 Dated: March 22, 2024

PHILLIP A. TALBERT
United States Attorney

16 By: /s/ Robin Tubesing
17 ROBIN TUBESING
Assistant United States Attorney