

United States District Court
Western District of Texas
San Antonio Division

United States of America,
Plaintiff,

v.

Devin Ward Elder,
Defendant.

Case No. SA-26-CR-00038-FB

Motion to Confirm the Sale of 1512 Wyoming Street, Units 1 and 2

The Receiver has entered into a contract to sell two 3-bedroom, 3-bath condominiums located at 1512 Wyoming Street, Units 1 and 2 (the “Property”) to Big Contracting and Consulting LLC (the “Buyer”) for the aggregate sum of \$640,000.00.

On February 19, 2026, the Court granted the Government’s motion to appoint Dan Kubinski as Receiver and permitted the interlocutory sale of numerous real properties identified in its Order. (Doc. 19). The Property consists of two 3-bedroom and 3-bath units in San Antonio, Texas identified as (o) and (p) in the Receivership Order. It is legally described as follows: NCB 1699 (1512 Wyoming Street Condominiums) Unit 1; and NCB 1699 (1512 Wyoming Street Condominiums) Unit 2.

The Buyer has offered \$640,000.00 for the Property. This price was reached through a negotiated, arms-length process, and the Receiver is satisfied that the price represents the fair market value for the Property. The Property was originally listed at \$479,000 for each unit, but it was later learned that roofs for both units need to be replaced, as well as sheet rock and walls. Thus, \$640,000.00 represents fair market value under these circumstances. The Property is subject to a lien in favor of Jefferson Bank, and there is a stipulation between the United States and Jefferson Bank (Doc. No. 33). After payment of the lien owed to Jefferson Bank, brokerage fees, ad valorem taxes and other standard closing costs, there will be no net proceeds as to this sale.

WHEREFORE, the United States of America requests an order of this Court confirming the sale of 1512 Wyoming Street, Units 1 and 2, and for such other relief as is just and appropriate.

Respectfully submitted,

JUSTIN R. SIMMONS
United States Attorney

By: /s/ Steven E. Seward

STEVEN E. SEWARD

Assistant United States Attorney

Florida Bar No. 29546

601 N.W. Loop 410, Suite 600

San Antonio, Texas 78216

Telephone: (210) 384-7259

Facsimile: (210) 384-7247

E-mail: Steven.Seward@usdoj.gov

ATTORNEY FOR UNITED STATES

Certificate of Service

I hereby certify that on September 25, 2026, I electronically filed this document with the Clerk of Court using the CM/ECF system which will send notice of the filing to the following CM/ECF participant(s):

John Gilmore
Attorney for Defendant

/s/ Steven E. Seward

STEVEN E. SEWARD

Assistant United States Attorney