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IN THE UNITED STATES DISTRICT COURT FOR THE  
 EASTERN DISTRICT OF CALIFORNIA

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11	UNITED STATES OF AMERICA,	)	2:11-MC-00021-LKK-KJN
		)	
12	Plaintiff,	)	STIPULATION AND ORDER EXTENDING
		)	TIME FOR FILING A COMPLAINT FOR
13	v.	)	FORFEITURE AND/OR TO OBTAIN AN
		)	INDICTMENT ALLEGING FORFEITURE
14	APPROXIMATELY \$400,720.00 IN	)	
	U.S. CURRENCY,	)	
15		)	
16	APPROXIMATELY \$294,967.00 IN	)	
	U.S. CURRENCY,	)	
17		)	
18	APPROXIMATELY \$3,073.00 IN	)	
	U.S. CURRENCY,	)	
19		)	
20	APPROXIMATELY \$399,940.00 IN	)	
	U.S. CURRENCY,	)	
21		)	
	Defendants.	)	

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23           It is hereby stipulated by and between the United States of  
 24 America and claimant Lonnie Patrick Terrell ("claimant"), by and  
 25 through their respective attorney, as follows:

26           1. On or about December 22, 2010, claimant Lonnie Patrick  
 27 Terrell filed claims, in the administrative forfeiture proceedings,  
 28 with the Drug Enforcement Administration with respect to the five

1 assets listed in the above-caption (hereafter the "defendant  
2 currency"), which were seized October 27, 2010.

3 2. The Drug Enforcement Administration has sent the written  
4 notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to  
5 all known interested parties. The time has expired for any person  
6 to file a claim to the defendant currency under 18 U.S.C. §  
7 983(a)(2)(A)-(E), and no person other than claimant has filed a  
8 claim to the defendant currency as required by law in the  
9 administrative forfeiture proceeding.

10 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is  
11 required to file a complaint for forfeiture against the defendant  
12 currency and/or to obtain an indictment alleging that the defendant  
13 currency is subject to forfeiture within 90 days after a claim has  
14 been filed in the administrative forfeiture proceedings, unless the  
15 court extends the deadline for good cause shown or by agreement of  
16 the parties. That deadline was March 22, 2011.

17 4. By Stipulation and Order filed March 3, 2011, the parties  
18 stipulated to extend to June 20, 2011, the time in which the United  
19 States is required to file a civil complaint for forfeiture against  
20 the defendant currency and/or to obtain an indictment alleging that  
21 the defendant currency is subject to forfeiture.

22 5. By Stipulation and Order filed June 1, 2011, the parties  
23 stipulated to extend to September 19, 2011, the time in which the  
24 United States is required to file a civil complaint for forfeiture  
25 against the defendant currency and/or to obtain an indictment  
26 alleging that the defendant currency is subject to forfeiture.

27 6. By Stipulation and Order filed September 19, 2011, the  
28 parties stipulated to extend to December 16, 2011, the time in

1 which the United States is required to file a civil complaint for  
2 forfeiture against the defendant currency and/or to obtain an  
3 indictment alleging that the defendant currency is subject to  
4 forfeiture.

5       7. By Stipulation and Order filed December 5, 2011, the  
6 parties stipulated to extend to March 15, 2012, the time in which  
7 the United States is required to file a civil complaint for  
8 forfeiture against the defendant currency and/or to obtain an  
9 indictment alleging that the defendant currency is subject to  
10 forfeiture.

11       8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish  
12 by agreement to further extend to June 13, 2012, the time in which  
13 the United States is required to file a civil complaint for  
14 forfeiture against the defendant currency and/or to obtain an  
15 indictment alleging that the defendant currency is subject to  
16 forfeiture.

17       9. Accordingly, the parties agree that the deadline by which  
18 the United States shall be required to file a complaint for  
19 forfeiture against the defendant currency and/or to obtain an

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1 indictment alleging that the defendant currency is subject to  
2 forfeiture shall be extended to June 13, 2012.

3 BENJAMIN B. WAGNER  
4 United States Attorney

5 DATE: 3/7/12

/s/ Kevin C. Khasigian  
6 KEVIN C. KHASIGIAN  
7 Assistant U.S. Attorney

8 DATE: 3/7/12

/s/ Zenia K. Gilg  
9 ZENIA K. GILG  
10 Attorney for Claimant Lonnie  
11 Patrick Terrell  
12 (Authorized by email)

13 **IT IS SO ORDERED.**

14 DATED: March 9, 2012.

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17 LAWRENCE K. KARLTON  
18 SENIOR JUDGE  
19 UNITED STATES DISTRICT COURT  
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