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 7
 8 IN THE UNITED STATES DISTRICT COURT FOR THE
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 UNITED STATES OF AMERICA,
 12 Plaintiff,

2:12-MC-00058-LKK-DAD

13 APPROXIMATELY \$143,058.81 IN U.S.
 14 CURRENCY SEIZED FROM WELLS
 FARGO BANK PERSONAL CHECKING
 15 ACCOUNT NUMBER 2065307502, AND
 16 APPROXIMATELY \$173,450.00 IN U.S.
 17 CURRENCY SEIZED FROM JP MORGAN
 CHASE PERSONAL CHECKING
 ACCOUNT NUMBER 918200346,
 18 Defendants.

STIPULATION AND ORDER
 EXTENDING TIME FOR FILING
 A COMPLAINT FOR
 FORFEITURE AND/OR TO
 OBTAIN AN INDICTMENT
 ALLEGING FORFEITURE

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 20 It is hereby stipulated by and between the United States of America and
 21 claimant Jeffrey S. Walker ("claimant"), by and through their respective counsel, as
 22 follows:

23 1. On or about May 7, 2012, claimant Jeffrey S. Walker filed a claim, in the
 24 administrative forfeiture proceedings, with the Internal Revenue Service with respect
 25 to the Approximately \$143,058.81 in U.S. Currency seized from Wells Fargo Bank
 26 Personal Checking Account Number 2065307502 and Approximately \$173,450.00 in
 27 U.S. Currency seized from JP Morgan Chase Personal Checking Account Number
 28 918200346 (hereafter the "defendant funds"), which were seized on March 6, 2012.

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

6 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a
7 complaint for forfeiture against the defendant funds and/or to obtain an indictment
8 alleging that the defendant funds are subject to forfeiture within ninety days after a
9 claim has been filed in the administrative forfeiture proceedings, unless the court
10 extends the deadline for good cause shown or by agreement of the parties. The
11 deadline is currently August 6, 2012.

12 4. By Stipulation and Order filed July 30, 2012, the parties stipulated to extend
13 to November 6, 2012, the time in which the United States is required to file a civil
14 complaint for forfeiture against the defendant funds and/or to obtain an indictment
15 alleging that the defendant funds are subject to forfeiture.

16 5. By Stipulation and Order filed November 1, 2012, the parties stipulated to
17 extend to February 6, 2013, the time in which the United States is required to file a
18 civil complaint for forfeiture against the defendant funds and/or to obtain an
19 indictment alleging that the defendant funds are subject to forfeiture.

20 6. By Stipulation and Order filed February 6, 2013, the parties stipulated to
21 extend to May 6, 2013, the time in which the United States is required to file a civil
22 complaint for forfeiture against the defendant funds and/or to obtain an indictment
23 alleging that the defendant funds are subject to forfeiture.

24 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to
25 extend to August 6, 2013, the time in which the United States is required to file a civil
26 complaint for forfeiture against the defendant funds and/or to obtain an indictment
27 alleging that the defendant funds are subject to forfeiture.

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1 8. Accordingly, the parties agree that the deadline by which the United States
2 shall be required to file a complaint for forfeiture against the defendant funds
3 and/or to obtain an indictment alleging that the defendant funds are subject to
4 forfeiture shall be extended to August 6, 2013.

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6 BENJAMIN B. WAGNER
United States Attorney


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8 DATE: 5/2/13 By: /s/ Kevin C. Khasigian
9 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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11 DATE: 5/1/13 /s/ J. Patrick McCarthy Extendi
12 J. PATRICK MCCARTHY
Attorney for Claimant
Jeffrey S. Walker

13 (Signature retained by attorney)

14 **IT IS SO ORDERED.**

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16 DATED: May 8, 2013.

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20 LAWRENCE K. KARLTON
21 SENIOR JUDGE
22 UNITED STATES DISTRICT COURT
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