

1 BENJAMIN B. WAGNER  
 United States Attorney  
 2 KEVIN C. KHASIGIAN  
 Assistant U. S. Attorney  
 3 501 I Street, Suite 10-100  
 Sacramento, CA 95814  
 4 Telephone: (916) 554-2700  
 5 Attorneys for the United States

6  
 7  
 8 IN THE UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

10  
 11 UNITED STATES OF AMERICA,

2:13-MC-00013-MCE-AC

12 Plaintiff,

13 v.

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

14 APPROXIMATELY \$92,777.78 IN U.S.  
 CURRENCY SEIZED FROM RIVER  
 15 CITY BANK ACCOUNT NUMBER  
 0220074437, HELD IN THE NAMES OF  
 16 ADAM WOOD AND BREANNA WOOD,

17 Defendant.  
 18

19 It is hereby stipulated by and between the United States of America and claimant Adam Wood  
 20 (“claimant”), by and through their respective counsel, as follows:

21 1. On or about November 20, 2012, claimant Adam Wood filed a claim, in the  
 22 administrative forfeiture proceedings, with the Internal Revenue Service with respect to the  
 23 Approximately \$92,777.78 (hereafter “defendant funds”), which were seized on November 5, 2012.

24 2. The Internal Revenue Service has sent the written notice of intent to forfeit required by  
 25 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
 26 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant  
 27 has filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.  
 28

1           3.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
2 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds  
3 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
4 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
5 That deadline is February 18, 2013.

6           4.       By Stipulation and Order filed February 19, 2013, the parties stipulated to extend to  
7 March 20, 2013, the time in which the United States is required to file a civil complaint for forfeiture  
8 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
9 to forfeiture.

10          5.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an extension  
11 to April 19, 2013, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
13 to forfeiture.

14          6.       Accordingly, the parties agree that the deadline by which the United States shall be  
15 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
16 alleging that the defendant funds are subject to forfeiture shall be extended to April 19, 2013.

17 Dated: 3/19/13

BENJAMIN B. WAGNER  
United States Attorney

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


21 Dated: 3/19/13

/s/ Patrick K. Hanly  
PATRICK K. HANLY  
Attorney for Claimant Adam Wood

(As authorized via phone on 3/19/13)

24           IT IS SO ORDERED.

25 DATED: March 27, 2013

  
MORRISON C. ENGLAND, JR., CHIEF JUDGE  
UNITED STATES DISTRICT JUDGE