

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-00107-TLN-CKD

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 \$34,251.43 IN U.S.
 CURRENCY SEIZED FROM BANK OF
 15 AMERICA ACCOUNT NUMBER
 000905941180, HELD IN THE NAME
 16 ARMANDO FLORES VASQUEZ, and

17 APPROXIMATELY \$2,043.62 IN U.S.
 CURRENCY SEIZED FROM BANK OF
 18 AMERICA ACCOUNT NUMBER
 000905548374, HELD IN THE NAME
 19 ARMANDO FLORES VASQUEZ,

20 Defendants.
 21

22 It is hereby stipulated by and between the United States of America and claimant Armando
 23 Flores Vasquez (“claimant”), by and through their respective counsel, as follows:

24 1. On or about July 15, 2013, claimant Armando Flores Vasquez filed a claim, in the
 25 administrative forfeiture proceedings, with the Internal Revenue Service with respect to the
 26 Approximately \$34,251.43 in U.S. Currency seized from Bank of America Account Number
 27 000905941180 and the Approximately \$2,043.62 in U.S. Currency seized from Bank of America
 28

1 Account Number 000905548374 (hereafter “defendant funds”), which were seized on May 6, 2013.

2 2. The Internal Revenue Service has sent the written notice of intent to forfeit required by
3 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
4 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant
5 has filed a claim to the 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 complaint for
7 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds
8 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
9 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
10 That deadline was October 11, 2013.

11 4. By Stipulation and Order filed October 8, 2013, the parties stipulated to extend to
12 January 9, 2014, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject
14 to forfeiture.

15 5. By Stipulation and Order filed January 9, 2014, the parties stipulated to extend to April
16 9, 2014, the time in which the United States is required to file a civil complaint for forfeiture against
17 the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
18 forfeiture.

19 6. By Stipulation and Order filed April 11, 2014, the parties stipulated to extend to July 8,
20 2014, the time in which the United States is required to file a civil complaint for forfeiture against the
21 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
22 forfeiture.

23 7. By Stipulation and Order filed July 7, 2014, the parties stipulated to extend to October 6,
24 2014, the time in which the United States is required to file a civil complaint for forfeiture against the
25 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
26 forfeiture.

27 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an extension
28 to December 5, 2014, the time in which the United States is required to file a civil complaint for

1 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds
2 are subject to forfeiture.

3 9. Accordingly, the parties agree that the deadline by which the United States shall be
4 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
5 alleging that the defendant funds are subject to forfeiture shall be extended to December 5, 2014.

6 Dated: 9/26/14

BENJAMIN B. WAGNER
United States Attorney

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

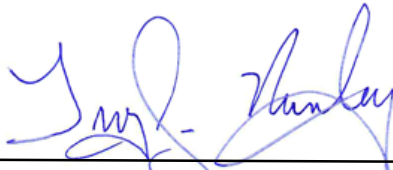
10 Dated: 9/26/14

11 /s/ William A. Harrison
12 WILLIAM A. HARRISON
Attorney for Claimant
Armando Flores Vasquez

13 (Authorized via phone)

14
15 IT IS SO ORDERED.

16 Dated: October 2, 2014

17
18
19 
20 Troy L. Nunley
United States District Judge