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

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11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

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.

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2:13-MC-00107-TLN-CKD

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

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

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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. By Stipulation and Order filed October 3, 2014, the parties stipulated to extend to
28 December 5, 2014, the time in which the United States is required to file a civil complaint for forfeiture

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

3 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an extension
4 to February 3, 2015, the time in which the United States is required to file a civil complaint for
5 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds
6 are subject to forfeiture.

7 10. Accordingly, the parties agree that the deadline by which the United States shall be
8 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
9 alleging that the defendant funds are subject to forfeiture shall be extended to February 3, 2015.

10 Dated: 12/3/14

BENJAMIN B. WAGNER
United States Attorney

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

14 Dated: 12/3/14

15 /s/ William A. Harrison
16 WILLIAM A. HARRISON
17 Attorney for Claimant
18 Armando Flores Vasquez

19 IT IS SO ORDERED.

20 Dated: December 5, 2014



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Troy L. Nunley
United States District Judge