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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

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.  
21

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  
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. 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  
Assistant U.S. Attorney

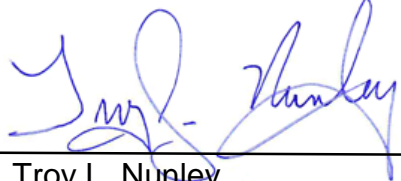
13  
14  
15 Dated: 12/3/14

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

(Authorized via phone)

16  
17  
18  
19 IT IS SO ORDERED.

20 Dated: December 5, 2014

21   
22 Troy L. Nunley  
23 United States District Judge  
24  
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26  
27  
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