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5 Attorneys for the United States

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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  
23 Armando Flores Vazquez (“claimant”), by and through their respective counsel, as  
24 follows:

25 1. On or about July 15, 2013, claimant Armando Flores Vazquez filed a claim,  
26 in the administrative forfeiture proceedings, with the Internal Revenue Service with  
27 respect to the Approximately \$34,251.43 in U.S. Currency seized from Bank of America  
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1 Account Number 000905941180 and the Approximately \$2,043.62 in U.S. Currency seized  
2 from Bank of America Account Number 000905548374 (hereafter “defendant funds”),  
3 which were seized on May 6, 2013.

4 2. The Internal Revenue Service has sent the written notice of intent to forfeit  
5 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has  
6 expired for any person to file a claim to the defendant funds under 18 U.S.C. §  
7 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant  
8 funds as required by law in the administrative forfeiture proceeding.

9 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a  
10 complaint for forfeiture against the defendant funds and/or to obtain an indictment  
11 alleging that the defendant funds are subject to forfeiture within ninety days after a  
12 claim has been filed in the administrative forfeiture proceedings, unless the court extends  
13 the deadline for good cause shown or by agreement of the parties. That deadline was  
14 October 11, 2013.

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

19 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an  
20 extension to April 9, 2014, the time in which the United States is required to file a civil  
21 complaint for forfeiture against the defendant funds and/or to obtain an indictment  
22 alleging that the defendant funds are subject to forfeiture.

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1           6.       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 and/or to  
3 obtain an indictment alleging that the defendant funds are subject to forfeiture shall be  
4 extended to April 9, 2014.

5 Dated:     1/8/14

BENJAMIN B. WAGNER  
United States Attorney

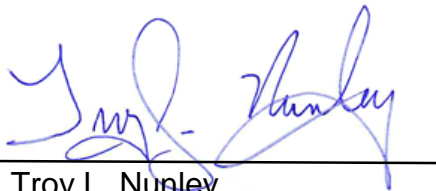
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7           /s/ Kevin C. Khasigian  
8           KEVIN C. KHASIGIAN  
9           Assistant U.S. Attorney

10 Dated:    1/8/14

11           /s/ William A. Harrison  
12           WILLIAM A. HARRISON  
13           Attorney for Claimant  
14           Armando Flores Vasquez  
15           (As authorized via telephone 1/8/14)

16  
17           IT IS SO ORDERED.

18 Dated: January 8, 2014

19             
20           Troy L. Nunley  
21           United States District Judge