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 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  
 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  
 28

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. By Stipulation and Order filed January 9, 2014, the parties stipulated to  
20 extend 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.

23 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an  
24 extension to July 8, 2014, the time in which the United States is required to file a civil  
25 complaint for forfeiture against the defendant funds and/or to obtain an indictment  
26 alleging that the defendant funds are subject to forfeiture.

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1           7.       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 July 8, 2014.

5 Dated:     4/9/14

BENJAMIN B. WAGNER  
United States Attorney

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

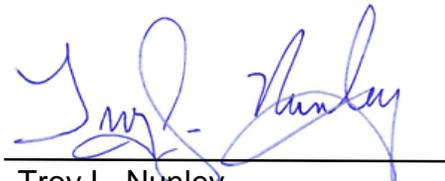
10 Dated:    4/9/14

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

(As authorized via telephone)

15           IT IS SO ORDERED.

16 Dated: April 9, 2014

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18             
19           \_\_\_\_\_  
20           Troy L. Nunley  
21           United States District Judge