

1 BENJAMIN B. WAGNER
United States Attorney
2 JEFFREY A. SPIVAK
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

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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,

2:14-MC-00008-LKK-KJN

12 Plaintiff,

13 v.

14 APPROXIMATELY \$5,000.00 IN U.S.
CURRENCY, and

15 APPROXIMATELY \$1,216.00 IN U.S.
16 CURRENCY,

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

19 It is hereby stipulated by and between the United States of America and claimants
20 Lee Vang and Chai Chang (“claimants”), in *Pro Se*, as follows:

21 1. On or about October 18, 2013, claimants Lee Vang and Chai Chang filed
22 claims, in the administrative forfeiture proceedings, with the Internal Revenue Service
23 with respect to the Approximately \$5,000.00 in U.S. Currency and Approximately
24 \$1,216.00 in U.S. Currency (hereafter “defendant currency”), which was seized on August
25 28, 2013.

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

4 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a
5 complaint for forfeiture against the defendant currency and/or to obtain an indictment
6 alleging that the defendant currency is subject to forfeiture within ninety days after a
7 claim has been filed in the administrative forfeiture proceedings, unless the court extends
8 the deadline for good cause shown or by agreement of the parties. That deadline is
9 January 16, 2014.

10 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an
11 extension to April 16, 2014, the time in which the United States is required to file a civil
12 complaint for forfeiture against the defendant currency and/or to obtain an indictment
13 alleging that the defendant currency is subject to forfeiture.

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1 5. 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 currency and/or
3 to obtain an indictment alleging that the defendant currency is subject to forfeiture shall
4 be extended to April 16, 2014.

5 Dated: 1/14/14

BENJAMIN B. WAGNER
United States Attorney

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7 /s/ Jeffrey A. Spivak
JEFFREY A. SPIVAK
Assistant U.S. Attorney

9 Dated: 1/16/14

10 /s/ Lee Vang
LEE VANG
Claimant, in PRO SE


12 Dated: 1/16/14

13 /s/ Chai Chang
CHAI CHANG
Claimant, in PRO SE

14 (Signatures retained by attorney)

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16 IT IS SO ORDERED.

17 Dated: January 23, 2014.

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19 
20 LAWRENCE K. KARLTON
21 SENIOR JUDGE
22 UNITED STATES DISTRICT COURT
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