

1 BENJAMIN B. WAGNER
United States Attorney
2 KEVIN C. KHASIGIAN
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

6
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 \$52,893.37 IN U.S.
15 CURRENCY SEIZED FROM WELLS FARGO
16 BANK ACCOUNT 1838449153, HELD IN THE
NAME OF DAVID ZINNEL,

17 Defendant

2:14-MC-00055-TLN-AC

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

18 It is hereby stipulated by and between the United States of America and claimant David Zinnel
19 (“claimant”), by and through their respective counsel, as follows:

20 1. On or about January 21, 2014, claimant David Zinnel filed a claim, in the administrative
21 forfeiture proceedings, with the Internal Revenue Service with respect to the Approximately
22 \$52,893.37 in U.S. Currency seized from Wells Fargo Bank account 1838449153, held in the name of
23 David Zinnel (hereafter “defendant funds”), which were seized on November 5, 2013.

24 2. The Internal Revenue Service has sent the written notice of intent to forfeit required by
25 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
26 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant
27 has filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

28 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
2 funds are subject to forfeiture within ninety days after a claim has been filed in the administrative
3 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
4 the parties. That deadline is April 21, 2014.

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

9 5. Accordingly, the parties agree that the deadline by which the United States shall be
10 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
11 alleging that the defendant funds are subject to forfeiture shall be extended to May 21, 2014.

12 Dated: 4/15/14

BENJAMIN B. WAGNER
United States Attorney

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

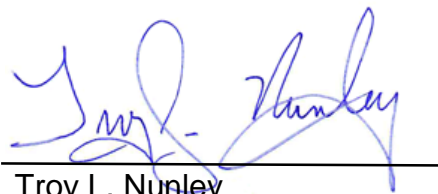
16 Dated: 4/15/14

/s/ Patrick K. Hanly
PATRICK K. HANLY
Attorney for Claimant David Zinnel

Authorized via email

20 IT IS SO ORDERED.

21 Dated: April 17, 2014

22 
23 _____
Troy L. Nunley
24 United States District Judge