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

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 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 seized from Wells Fargo Bank account 1838449153, held in the name of David Zinnel
 23 (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.

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds
3 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
4 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
5 That deadline was April 21, 2014.

6 4. By Stipulation and Order filed April 22, 2014, the parties stipulated to extend to May 21,
7 2014, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
9 forfeiture.

10 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
11 extend to June 20, 2014, the time in which the United States is required to file a civil complaint for
12 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds
13 are subject to forfeiture.

14 6. Accordingly, the parties agree that the deadline by which the United States shall be
15 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
16 alleging that the defendant funds are subject to forfeiture shall be extended to June 20, 2014.

17 Dated: 5/21/14

BENJAMIN B. WAGNER
United States Attorney

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

21 Dated: 5/21/14

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

(Authorized by email)

25 IT IS SO ORDERED.

26 Dated: May 27, 2014


Troy L. Nunley
United States District Judge