

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 \$289,695.00 IN U.S.  
CURRENCY,  
15 APPROXIMATELY \$20,389.00 IN U.S.  
16 CURRENCY,  
17 APPROXIMATELY \$5,439.00 IN U.S.  
CURRENCY,  
18 APPROXIMATELY \$7,438.56 SEIZED FROM  
19 TRAVIS CREDIT UNION ACCOUNT  
NUMBER 432952,  
20 APPROXIMATELY \$4,536.29 SEIZED FROM  
21 WELLS FARGO BANK ACCOUNT NUMBER  
8813392803,  
22 APPROXIMATELY \$1,889.79 SEIZED FROM  
23 WELLS FARGO BANK ACCOUNT NUMBER  
2297760957,  
24 APPROXIMATELY \$1,265.76 SEIZED FROM  
25 WELLS FARGO BANK ACCOUNT NUMBER  
2783081207,  
26 APPROXIMATELY \$1,002.30 SEIZED FROM  
27 WELLS FARGO BANK ACCOUNT NUMBER  
7218921497,  
28

2:14-MC-00065-WBS-KJN

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

1 APPROXIMATELY \$800.65 SEIZED FROM  
2 WELLS FARGO BANK ACCOUNT NUMBER  
3 3827072285,

4 APPROXIMATELY \$134.22 SEIZED FROM  
5 WELLS FARGO BANK ACCOUNT NUMBER  
6 1940941055,

7 APPROXIMATELY \$3,576.83 SEIZED FROM  
8 UNION BANK ACCOUNT NUMBER  
9 11712478,

10 APPROXIMATELY \$1,524.97 SEIZED FROM  
11 UNION BANK ACCOUNT NUMBER  
12 11712486,

13 APPROXIMATELY \$2,002.79 SEIZED FROM  
14 BANK OF AMERICA ACCOUNT NUMBER  
15 19776-06262,

16 APPROXIMATELY \$868.47 SEIZED FROM  
17 BANK OF AMERICA ACCOUNT NUMBER  
18 19776-05854,

19 APPLE MAC DESKTOP COMPUTER, SERIAL  
20 NUMBER CD2K2BM9DNCV, and

21 2001 CROWNLIN 212 DB POWER BOAT  
22 WITH TRAILER, VIN: JTC42712A101,  
23 CALIFORNIA LICENSE NUMBER:4AC1996,

24  
25 Defendants.

26 It is hereby stipulated by and between the United States of America and claimants Brian Corry  
27 Robinson and Kimberly Santiago-Robinson, through undersigned counsel, as follows:

28 1. On or about February 10, 2014, claimants Brian Corry Robinson and Kimberly  
Santiago-Robinson filed a claim, in the administrative forfeiture proceedings, with the Drug  
Enforcement Administration with respect to the assets captioned above (hereafter “defendant assets”),  
which were seized between October 24, 2013 and October 31, 2013.

2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
person to file a claim to the defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
than the claimant has filed a claim to the defendant assets as required by law in the administrative

1 forfeiture proceeding.

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

7 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an extension  
8 to June 30, 2014, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
10 to forfeiture.

11 5. Accordingly, the parties agree that the deadline by which the United States shall be  
12 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment  
13 alleging that the defendant assets are subject to forfeiture shall be extended to June 30, 2014.

14 Dated: 4/29/14

BENJAMIN B. WAGNER  
United States Attorney


15  
16 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

17  
18 Dated: 4/29/14

/s/ David M. Michael  
DAVID M. MICHAEL  
Attorney for Claimants  
(Authorized via email 4/29/14)

19  
20  
21  
22 IT IS SO ORDERED.

23 Dated: May 1, 2014

24   
25 WILLIAM B. SHUBB  
26 UNITED STATES DISTRICT JUDGE  
27  
28