

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

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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 \$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 CROWNLINER 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. By Stipulation and Order filed May 1, 2014, the parties stipulated to extend to June 30,
8 2014 the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
10 forfeiture.

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

15 6. Accordingly, the parties agree that the deadline by which the United States shall be
16 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
17 alleging that the defendant assets are subject to forfeiture shall be extended to August 21, 2014.

18 Dated: 5/22/14

BENJAMIN B. WAGNER
United States Attorney

19
20 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney


21
22 Dated: 5/22/14

/s/ David M. Michael
DAVID M. MICHAEL
Attorney for Claimants

(Authorized via email 5/22/14)

23
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26 IT IS SO ORDERED.

27 Dated: May 27, 2014

28 
WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE