

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,
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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,

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

5 APPROXIMATELY \$3,576.83 SEIZED FROM
6 UNION BANK ACCOUNT NUMBER
7 11712478,

7 APPROXIMATELY \$1,524.97 SEIZED FROM
8 UNION BANK ACCOUNT NUMBER
9 11712486,

9 APPROXIMATELY \$2,002.79 SEIZED FROM
10 BANK OF AMERICA ACCOUNT NUMBER
11 19776-06262,

11 APPROXIMATELY \$868.47 SEIZED FROM
12 BANK OF AMERICA ACCOUNT NUMBER
13 19776-05854,

13 APPLE MAC DESKTOP COMPUTER, SERIAL
14 NUMBER CD2K2BM9DNCV, and

14 2001 CROWNLIN 212 DB POWER BOAT
15 WITH TRAILER, VIN: JTC42712A101,
16 CALIFORNIA LICENSE NUMBER:4AC1996,

17 Defendants.

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

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

25 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
26 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
27 person to file a claim to the defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
28 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. By Stipulation and Order filed May 27, 2014, the parties stipulated to extend to August
12 21, 2014 the time in which the United States is required to file a civil complaint for forfeiture against
13 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
14 forfeiture.

15 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an extension
16 to September 22, 2014, the time in which the United States is required to file a civil complaint for
17 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets
18 are subject to forfeiture.

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1 7. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
3 alleging that the defendant assets are subject to forfeiture shall be extended to September 22, 2014.

4 Dated: 8/20/14

BENJAMIN B. WAGNER
United States Attorney

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

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8 Dated: 8/20/14

/s/ David M. Michael
DAVID M. MICHAEL
Attorney for Claimants
(Authorized via email 8/20/14)

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12 IT IS SO ORDERED.

13 Dated: August 25, 2014

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15 WILLIAM B. SHUBB
16 UNITED STATES DISTRICT JUDGE
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