

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 MISCELLANEOUS FIREARMS,
 AMMUNITION, AND CURRENCY
 15 LISTED IN EXHIBIT A,

16 Defendant.

2:14-MC-00074-MCE-CKD

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 potential claimant Mike
 19 R. Turner (“claimant”), as follows:

20 1. On or about February 6, 2014, claimant filed a claim in the administrative forfeiture
 21 proceeding with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) with respect to the
 22 Miscellaneous Firearms and Ammunition listed in Exhibit A¹ attached hereto and incorporated herein
 23 (hereafter “defendant properties”), which were seized on or about October 9, 2013.

24 2. The ATF has sent the written notice of intent to forfeit required by 18 U.S.C. §
 25 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
 26 defendant properties under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a

27 ¹ The United States has resolved the claims of Craig Mason and LaRay Chambers. In addition, the United States has decided
 28 not to file against the two amounts of currency claimed by Mike R. Turner. Exhibit A attached contains only the defendant
 properties that the United States is currently seeking forfeiture of.

1 claim to the defendant properties as required by law in the administrative 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 properties and/or to obtain an indictment alleging that the defendant
4 properties are subject to forfeiture within ninety days after a claim has been filed in the administrative
5 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
6 parties. That deadline was May 7, 2014.

7 4. By Stipulation and Order filed May 14, 2014, the parties stipulated to extend to July 7,
8 2014, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant properties and/or to obtain an indictment alleging that the defendant properties are subject to
10 forfeiture.

11 5. By Stipulation and Order filed July 3, 2014, the parties stipulated to extend to October 6,
12 2014, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant properties and/or to obtain an indictment alleging that the defendant properties are subject to
14 forfeiture.

15 6. By Stipulation and Order filed October 7, 2014, the parties stipulated to extend to
16 December 5, 2014, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant properties and/or to obtain an indictment alleging that the defendant properties are
18 subject to forfeiture.

19 7. By Stipulation and Order filed November 26, 2014, the parties stipulated to extend to
20 March 5, 2015, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant properties and/or to obtain an indictment alleging that the defendant properties are
22 subject to forfeiture.

23 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
24 to June 3, 2015, the time in which the United States is required to file a civil complaint for forfeiture
25 against the defendant properties and/or to obtain an indictment alleging that the defendant properties are
26 subject to forfeiture.

27 9. Accordingly, the parties agree that the deadline by which the United States shall be

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1 required to file a complaint for forfeiture against the defendant properties and/or to obtain an indictment
2 alleging that the defendant properties are subject to forfeiture shall be extended to June 3, 2015.

3 Dated: 2/25/15

BENJAMIN B. WAGNER
United States Attorney

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

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7 Dated: 2/23/15

/s/ Greg Foster
GREG FOSTER
Attorney for potential claimant Mike R. Turner
(Authorized by email)

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10 **IT IS SO ORDERED.**

11 Dated: March 3, 2015

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MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT

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Exhibit A

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1. Unknown Rifle Cal: unknown SN: none (14-ATF-000769),
2. Unknown Rifle Cal: unknown SN: none (14-ATF-000773),
3. Unknown Rifle Cal: unknown SN: none (14-ATF-000774),
4. Unknown Rifle Cal: unknown SN: none (14-ATF-000782),
5. Unknown Rifle Cal: unknown SN: none (14-ATF-000783),
6. Polytechnologies AKS Rifle Cal: 762 SN: 8748 (14-ATF-000786),
7. Unknown Pistol Cal: unknown SN: none (14-ATF-000789),
8. Unknown Pistol Cal: unknown SN: none (14-ATF-000790),
9. Unknown Rifle Cal: unknown SN: none (14-ATF-000791),
10. Unknown Rifle Cal: unknown SN: none (14-ATF-000792),
11. Unknown Rifle Cal: unknown SN: none (14-ATF-000794),
12. Unknown Receiver/Frame Cal: unknown SN: none (14-ATF-000795),
13. Unknown Rifle Cal: unknown SN: none (14-ATF-000796),
14. Vltor Weapons Systems unknown Pistol Cal: unknown SN: none (14-ATF-001254), and
15. 20 rounds of Winchester-Western ammunition Cal: 20 (14-ATF-001054).