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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-LKK-CKD

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

17  
18 It is hereby stipulated by and between the United States of America and potential claimants Craig  
19 Mason, LaRay Chambers, and Mike R. Turner (“claimants”), as follows:

20 1. On or about February 6, 2014, claimants filed a claims in the administrative forfeiture  
21 proceeding with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) with respect to the  
22 Miscellaneous Firearms, Ammunition, and Currency listed in Exhibit A attached hereto and incorporated  
23 herein (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 claimants has filed a  
27 claim to the defendant properties as required by law in the administrative forfeiture proceeding.

28 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

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

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to July  
6 7, 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant properties and/or to obtain an indictment alleging that the defendant properties are subject to  
8 forfeiture.

9 5. Accordingly, the parties agree that the deadline by which the United States shall be  
10 required to file a complaint for forfeiture against the defendant properties and/or to obtain an indictment  
11 alleging that the defendant properties are subject to forfeiture shall be extended to July 7, 2014.

12 Dated: 5/7/14

BENJAMIN B. WAGNER  
United States Attorney

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

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16 Dated: 5/1/14

/s/ Jason Davis  
JASON DAVIS  
Attorney for potential claimants Craig Mason and  
LaRay Chambers

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19 Dated: 5/1/14

/s/ Greg Foster  
GREG FOSTER  
Attorney for potential claimant Mike R. Turner

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21 (Signatures authorized by email)

22 **IT IS SO ORDERED.**

23 Dated: May 13, 2014

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25   
LAWRENCE R. KARLTON  
26 SENIOR JUDGE  
UNITED STATES DISTRICT COURT

**Exhibit A**

1. Winchester 59 Shotgun Cal: 12 SN: 5718 (14-ATF-000829),
2. Beretta USA Corp. 21A Pistol Cal: 22 SN: BAS13749U (14-ATF-001073),
3. Colt unknown Pistol Cal: unknown SN: 263212 (14-ATF-001074),
4. Colt unknown Pistol Cal: unknown SN: 316700 (14-ATF-001075),
5. Unknown Rifle Receiver/Frame Cal: unknown SN: 1990CS4088 (14-ATF-001077),
6. Unknown Manufacturer unknown Rifle Cal: unknown 1986S (14-ATF-001078),
7. Unknown Rifle Cal: unknown SN: 1986S-BS3696 (14-ATF-001079),
8. Unknown Pistol Cal: unknown SN: 126 (14-ATF-001080),
9. 1,100 rounds of assorted ammunition Cal: unknown (14-ATF-001081),
10. Double Star Corp. Star 15 Rifle Cal: 223 SN: DSCG2958 (14-ATF-001083),
11. Ruger 10/22 Rifle Cal: 22 SN: 35295083 (14-ATF-001084),
12. Remington Arms Company, Inc. 700 Rifle Cal: 30-06 SN: A6719216 (14-ATF-001085),
13. Keltec, CNC Industries, Inc. SU-16 Rifle Cal: 223 SN: N4P86 (14-ATF-001086),
14. Ruger 10/22 Rifle Cal: 22 SN: 126-09600 (14-ATF-001087),
15. Ruger Mini 14 Rifle Cal: 223 SN: 186-38947 (14-ATF-001088),
16. Unknown Rifle Cal: unknown SN: BYF 9404 (14-ATF-001089),
17. 4,617 rounds of assorted ammunition, Cal: unknown (14-ATF-001090),
18. 8,016 rounds of unknown ammunition Cal: unknown (14-ATF-001091),
19. 1,767 rounds of assorted ammunition Cal: unknown (14-ATF-001092),
20. 1,033 rounds of assorted ammunition Cal: unknown (14-ATF-001093),
21. Unknown Rifle Cal: unknown SN: unknown (14-ATF-001101),
22. Unknown Pistol Cal: unknown SN: unknown (14-ATF-001102),
23. Unknown Rifle Cal: unknown SN: unknown (14-ATF-001103),
24. Unknown Rifle Cal: unknown SN: unknown (14-ATF-001104),
25. Unknown Receiver/Frame Cal: unknown SN: unknown (14-ATF-001105),
26. Unknown Rifle Cal: unknown SN: unknown (14-ATF-001106),
27. Unknown Rifle Cal: unknown SN: unknown (14-ATF-001107),
28. Unknown Receiver/Frame Cal: unknown SN: unknown (14-ATF-001108),
29. Unknown Receiver/Frame Cal: unknown SN: unknown (14-ATF-001109),
30. Unknown Receiver/Frame Cal: unknown SN: unknown (14-ATF-001110),
31. Springfield Armory, Geneseo, IL. Micro Compact Pistol Cal: 4 (14-ATF-001938),
32. Approximately \$5,325.00 in U.S. Currency (14-ATF-000254),
33. 500 Rounds of ammunition Cal: .308
34. 38 Magpul 30 round magazines,
35. 18 various firearm magazines,
36. 28 AR15 style unfinished receiver blanks,
37. 11 AR308 style unfinished receiver blanks,
38. Box of Glock parts with slide, barrel and other components,
39. 1 lower receiver,
40. 1 "Cast" lower,
41. 1 damaged unfinished .223 receiver blank,
42. 4 complete lower receivers with stocks and LPKS ,
43. 10,000-12,000 rounds of ammunition Cal: .22 LR,
44. 2,000 rounds of ammunition Cal: .40,
45. 15,000 rounds of ammunition Cal: 5.56/.223,
46. 3,000 rounds of ammunition Cal: 7.62x39,
47. 2,000 rounds of ammunition Cal: 5.45x39,
48. 1,000 rounds of ammunition Cal: .308,
49. 500 rounds of ammunition Cal: 8mm Mauser,
50. 100 rounds of ammunition Cal: .303 British,
51. 1,500 rounds of ammunition Cal: 30-06,
52. 500 rounds of ammunition Cal: 9mm,

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- 53. 20 rounds of ammunition Cal: .45ACP,
- 54. 50 rounds of ammunition Cal: .25,
- 55. 100 rounds of ammunition Cal: .357 Magnum,
- 56. 200 rounds of assorted ammunition Cal: unknown (14-ATF-001015),
- 57. Smith & Wesson unknown Pistol Cal: 38 SN: AWC3587 (14-ATF-001940),
- 58. Approximately \$3,990.00 in U.S. Currency (14-ATF-000253),
- 59. Approximately \$2,400.00 in U.S. Currency (14-ATF-000255),
- 60. Unknown Rifle Cal: unknown SN: none (14-ATF-000769),
- 61. Unknown Rifle Cal: unknown SN: none (14-ATF-000773),
- 62. Unknown Rifle Cal: unknown SN: none (14-ATF-000774),
- 63. Unknown Rifle Cal: unknown SN: none (14-ATF-000782),
- 64. Unknown Rifle Cal: unknown SN: none (14-ATF-000783),
- 65. Polytechnologies AKS Rifle Cal: 762 SN: 8748 (14-ATF-000786),
- 66. Unknown Pistol Cal: unknown SN: none (14-ATF-000789),
- 67. Unknown Pistol Cal: unknown SN: none (14-ATF-000790),
- 68. Unknown Rifle Cal: unknown SN: none (14-ATF-000791),
- 69. Unknown Rifle Cal: unknown SN: none (14-ATF-000792),
- 70. Unknown Rifle Cal: unknown SN: none (14-ATF-000794),
- 71. Unknown Receiver/Frame Cal: unknown SN: none (14-ATF-000795),
- 72. Unknown Rifle Cal: unknown SN: none (14-ATF-000796),
- 73. Vltor Weapons Systems unknown Pistol Cal: unknown SN: none (14-ATF-001254),
- 74. 20 rounds of Winchester-Western ammunition Cal: 20 (14-ATF-001054), and
- 75. Miscellaneous receivers and firearm parts.