

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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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
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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 A<sup>1</sup> 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 <sup>1</sup> 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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
16 to December 5, 2014, the time in which the United States is required to file a civil complaint for  
17 forfeiture against the defendant properties and/or to obtain an indictment alleging that the defendant  
18 properties are subject to forfeiture.

19 7. 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 December 5, 2014.

3 Dated: 9/30/14

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: 9/29/14

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

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**ORDER**

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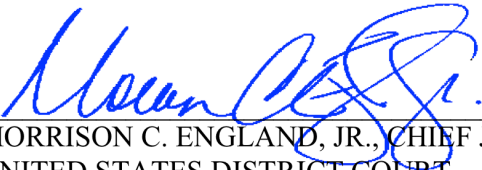
**IT IS SO ORDERED.**

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Dated: October 2, 2014

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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).