

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 \$165,499.00 IN U.S.
CURRENCY, and

15 APPROXIMATELY \$25,232.67 SEIZED FROM
16 MERRILL LYNCH WEALTH MANAGEMENT
ACCOUNT NUMBER 243-26197,

17 Defendants.

2:14-MC-00090-TLN-AC

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

18
19 It is hereby stipulated by and between the United States of America and claimants Jimmy and
20 Elena Rogers (“claimants”), by and through their respective counsel, as follows:

21 1. On or about April 4, 2014, claimants Jimmy and Elena Rogers filed a claim in the
22 administrative forfeiture proceedings, with the with the Drug Enforcement Administration with respect
23 to the Approximately \$165,499.00 in U.S. Currency and the Approximately \$25,232.67 seized from
24 Merrill Lynch Wealth Management Account Number 243-26197 (hereafter “defendant assets”), which
25 were seized on January 9, 2014 and adopted by the Drug Enforcement Administration on February 7,
26 2014.

27 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
28 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any

1 person to file a claim to the defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
2 than the claimant has filed a claim to the defendant assets as required by law in the administrative
3 forfeiture proceeding.

4 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
5 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets
6 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
7 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
8 That deadline is July 3, 2014.

9 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an extension
10 to October 1, 2014, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are
12 subject to forfeiture.

13 5. Accordingly, the parties agree that the deadline by which the United States shall be
14 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
15 alleging that the defendant assets are subject to forfeiture shall be extended to October 1, 2014.

16 Dated: 6/25/14

BENJAMIN B. WAGNER
United States Attorney

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

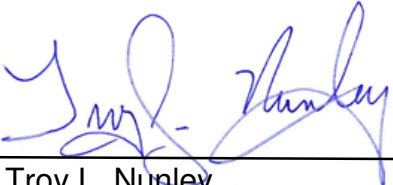
20 Dated: 6/25/14

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for Claimants
Jimmy and Elena Rogers

Authorized via email

25 IT IS SO ORDERED.

26 Dated: June 25, 2014


Troy L. Nunley
United States District Judge