

1 BENJAMIN B. WAGNER  
United States Attorney  
2 MARILEE L. MILLER  
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 APPROXIMATELY \$19,880.00 IN U.S.  
CURRENCY,  
15 Defendant.  
16

2:15-MC-00047-WBS-KJN

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 claimant Tristram G.  
19 Jensvold (“claimant”), by and through their respective counsel, as follows:

20 1. On or about March 9, 2015, claimant filed a claim in the administrative forfeiture  
21 proceeding with the Drug Enforcement Administration with respect to the Approximately \$19,880.00 in  
22 U.S. Currency (hereafter “defendant currency”), which was seized on or about December 17, 2014.

23 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
26 than claimant has filed a claim to the defendant currency as required by law in the administrative  
27 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 currency and/or to obtain an indictment alleging that the defendant  
2 currency is 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 was June 5, 2015.

5 4. By Stipulation and Order filed May 13, 2015, the parties stipulated to extend to August 4,  
6 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9 5. By Stipulation and Order filed July 28, 2015, the parties stipulated to extend to September  
10 18, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
11 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
12 forfeiture.

13 6. By Stipulation and Order filed September 21, 2015, the parties stipulated to extend to  
14 October 2, 2015, the time in which the United States is required to file a civil complaint for forfeiture  
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
16 subject to forfeiture.

17 7. By Stipulation and Order filed October 7, 2015, the parties stipulated to extend to October  
18 16, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
19 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
20 forfeiture.

21 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
22 to October 30, 2015, the time in which the United States is required to file a civil complaint for forfeiture  
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
24 subject to forfeiture.

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9. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to October 30, 2015.

Dated: 10/15/15

BENJAMIN B. WAGNER  
United States Attorney

By: /s/ Marilee L. Miller  
MARILEE L. MILLER  
Assistant U.S. Attorney


Dated: 10/15/15

/s/ David J. Cohen  
DAVID J. COHEN, ESQ.  
Attorney for claimant Tristram G. Jensvold

(Authorized by phone)

**IT IS SO ORDERED.**

Dated: October 16, 2015

  
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WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE