

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

6
 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 UNITED STATES OF AMERICA,

2:15-MC-00076-MCE-CKD

12 Plaintiff,

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

13 v.

14 APPROXIMATELY \$106,918.00 IN U.S.
 CURRENCY, and

15 APPROXIMATELY \$59,240.00 IN U.S.
 16 CURRENCY,

17 Defendants.

18
 19 It is hereby stipulated by and between the United States of America and claimant Khachatur
 20 Advalyan (“claimant”), by and through their respective counsel, as follows:

21 1. On or about April 10, 2015, claimant filed claims in the administrative forfeiture
 22 proceeding with the U.S. Customs and Border Protection with respect to the Approximately \$106,918.00
 23 in U.S. Currency and Approximately \$59,240.00 in U.S. Currency (hereafter “defendant currency”),
 24 which was seized on or about January 26, 2015.

25 2. The U.S. Customs and Border Protection has sent the written notice of intent to forfeit
 26 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
 27 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
 28 than claimant has filed a claim to the defendant currency as required by law in the administrative

1 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 currency and/or to obtain an indictment alleging that the defendant
4 currency is 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 is July 9, 2015.

7 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
8 October 7, 2015, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
10 subject to forfeiture.

11 5. Accordingly, the parties agree that the deadline by which the United States shall be
12 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
13 alleging that the defendant currency is subject to forfeiture shall be extended to October 7, 2015.

14 Dated: 7/2/15

BENJAMIN B. WAGNER
United States Attorney

15
16
17 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

18
19 Dated: 7/1/15


/s/ Joseph A. Welch
JOSEPH A. WELCH
Attorney for claimant Khachatur Advalyan

(Authorized by email)

20
21
22 **ORDER**

23 **IT IS SO ORDERED.**

24 Dated: July 8, 2015

25
26 
27 MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT