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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 APPROXIMATELY \$331,956.60 SEIZED  
FROM CHARLES SCHWAB ACCOUNT  
15 NUMBER 1213-6532,

16 APPROXIMATELY \$50,660.10 SEIZED  
FROM VANGUARD ACCOUNT  
17 NUMBER 0540-88079073938,

18 APPROXIMATELY \$7,167.31 SEIZED  
FROM VANGUARD ACCOUNT  
19 NUMBER 0040-88063595422,

20 APPROXIMATELY \$1,844.15 SEIZED  
FROM VANGUARD ACCOUNT  
21 NUMBER 0040-88060247883,

22 APPROXIMATELY \$15,368.53 SEIZED  
FROM WELLS FARGO BANK  
23 ACCOUNT NUMBER 5763134987, HELD  
IN THE NAME OF PAUL A. FOURNIER,

24 APPROXIMATELY \$3,375.09 SEIZED  
25 FROM WELLS FARGO BANK  
ACCOUNT NUMBER 5917189986,

26 APPROXIMATELY \$8,817.73 SEIZED  
27 FROM WELLS FARGO BANK  
ACCOUNT NUMBER 9894553933,  
28

2:16-MC-00077-TLN-AC

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

1 APPROXIMATELY \$9,724.22 SEIZED  
2 FROM WELLS FARGO BANK  
ACCOUNT NUMBER 1483149173, AND

3 APPROXIMATELY \$2,970.36 SEIZED  
4 FROM BANK OF AMERICA ACCOUNT  
NUMBER 457024979427,

5 Defendants.

6  
7 It is hereby stipulated by and between the United States of America and potential claimant Paul  
8 A. Fournier (“claimant”), in *propria persona*, as follows:

9 1. On or about February 22, 2016, the Federal Bureau of Investigation seized the above-  
10 referenced defendant funds pursuant to Federal seizure warrants.

11 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iii), and 983(a)(3)(A), the United States is required to  
12 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an  
13 indictment alleging that the defendant funds are subject to forfeiture within sixty days of seizure, unless  
14 the court extends the deadline for good cause shown or by agreement of the parties. That deadline was  
15 April 22, 2016.

16 3. By Stipulation and Order filed May 11, 2016, the parties stipulated to extend to July 21,  
17 2016, the time in which the United States is required to file a civil complaint for forfeiture against the  
18 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

19 4. By Stipulation and Order filed July 22, 2016, the parties stipulated to extend to October  
20 19, 2016, the time in which the United States is required to file a civil complaint for forfeiture against the  
21 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

22 5. By Stipulation and Order filed October 21, 2016, the parties stipulated to extend to  
23 January 17, 2017, the time in which the United States is required to file a civil complaint for forfeiture  
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
25 forfeiture

26 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
27 to April 17, 2017, the time in which the United States is required to file a civil complaint for forfeiture  
28 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to

1 forfeiture.

2 7. Accordingly, the parties agree that the deadline by which the United States shall be  
3 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
4 alleging that the defendant funds are subject to forfeiture shall be extended to April 17, 2017.

5  
6 Dated: 1/13/17

PHILLIP A. TALBERT  
United States Attorney

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

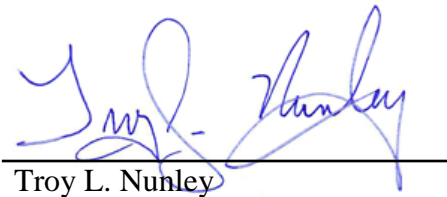
10  
11 Dated: 1/12/17

/s/ Paul A. Fournier  
PAUL A. FOURNIER  
Potential Claimant appearing  
in *propria persona*

13  
14 (Signature retained by attorney)

15  
16 **IT IS SO ORDERED.**

17 Dated: January 13, 2017

18  
19 

20 Troy L. Nunley  
United States District Judge