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 7  
 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 \$104,300.00 IN U.S.  
 CURRENCY,  
 15 Defendant.  
 16

2:16-MC-00097-TLN-AC  
 STIPULATION AND ORDER  
 EXTENDING TIME FOR FILING  
 A COMPLAINT FOR FORFEITURE  
 AND/OR TO OBTAIN AN  
 INDICTMENT ALLEGING  
 FORFEITURE

17 It is hereby stipulated by and between the United States of America and claimant Derrick Tavon  
 18 Faulcon (“claimant” or “Faulcon”), by and through their respective counsel, as follows:

19 1. On or about February 17, 2016, claimant Faulcon filed a claim in the administrative  
 20 forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately  
 21 \$104,300.00 in U.S. Currency (hereafter “defendant currency”), which was seized on November 9,  
 22 2015.

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  
 26 other than the claimant has filed a claim to the defendant currency as required by law in the  
 27 administrative 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 proceedings, unless the court extends the deadline for good cause shown or by agreement of  
4 the parties. That deadline is May 17, 2016.

5 4. By Stipulation and Order filed May 16, 2016, the parties stipulated to extend to July 15,  
6 2016, 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 13, 2016, the parties stipulated to extend to August  
10 15, 2016, the time in which the United States is required to file a civil complaint for forfeiture against  
11 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
12 forfeiture.

13 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
14 October 14, 2016, 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.

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