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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,

2:17-MC-00149-KJM-CKD

12 Plaintiff,

13 v.

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

14 \$257,258.00 MAINTAINED AT AMERICAN
 RIVER BANK, ACCOUNT NUMBER
 15 310042213, HELD IN THE NAME OF TIME
 ENTERPRISES, LLC;

16 \$99,947.00 MAINTAINED AT WELLS
 17 FARGO BANK, ACCOUNT NUMBER
 6311698424, HELD IN THE NAME OF
 18 MERON, INC., DBA: WOW IMAGING
 PRODUCTS;

19 \$293,568.00 MAINTAINED AT WELLS
 20 FARGO BANK, ACCOUNT NUMBER
 6038669990, HELD IN THE NAME OF
 21 MICHAEL AND ERIN LOWE;

22 \$24,502.00 MAINTAINED AT WELLS
 FARGO BANK, ACCOUNT NUMBER
 23 0390560696, HELD IN THE NAME OF
 MICHAEL AND ERIN LOWE; and

24 \$1,050,000.00 MAINTAINED AT FIDELITY
 25 INVESTMENTS, ACCOUNT NUMBER 676-
 411771, HELD IN THE NAME JIMMY A.
 26 MERON FAMILY TRUST.

27 Defendants.

1 It is hereby stipulated by and between the United States of America and potential claimants
2 Jimmy Meron and Michael Lowe (“potential claimants”), by and through their respective counsel, as
3 follows:

4 1. On July 12, 2017, agents with the General Services Administration – Office of Inspector
5 General (“GSA-OIG”) seized the above listed assets held in the names of potential claimants Jimmy
6 Meron and Michael Lowe.

7 2. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
8 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
9 currency is subject to forfeiture within ninety days after seizure, unless the court extends the deadline
10 for good cause shown or by agreement of the parties. That deadline is October 10, 2017.

11 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
12 January 8, 2018, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
14 subject to forfeiture.

15 4. Accordingly, the parties agree that the deadline by which the United States shall be
16 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
17 alleging that the defendant currency is subject to forfeiture shall be extended to January 8, 2018.

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Dated: 10/5/17

PHILLIP A. TALBERT
United States Attorney

By: /s/ Andre M. Espinosa
ANDRE M. ESPINOSA
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: 10-4-17

/s/ Kenneth L. Rosefeld
KENNETH L. ROSENFELD
Attorney for Jimmy Meron

Dated: 10-4-17

/s/ Allen Sawyer
ALLEN SAWYER
Attorney for Michael Lowe

IT IS SO ORDERED.

Dated: October 11, 2017.


UNITED STATES DISTRICT JUDGE