

1 PHILLIP A. TALBERT  
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,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$9,200.00 IN U.S.  
CURRENCY,

15 Defendant.

2:17-MC-00155-WBS-CKD

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

16  
17 It is hereby stipulated by and between the United States of America and potential claimant  
18 Richard Anderson (“Anderson”), appearing in *propria persona*, as follows:

19 1. On or about July 21, 2017 potential claimant Anderson filed a claim in the  
20 administrative forfeiture proceedings with the United States Postal Inspection Service with respect to  
21 the Approximately \$9,200.00 in U.S. Currency. (hereafter “defendant currency”), which was seized on  
22 May 23, 2017.

23 2. The United States Postal Inspection Service 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.

1           3.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
4 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
5 the parties. That deadline is October 19, 2017.

6           4.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
7 December 18, 2017, the time in which the United States is required to file a civil complaint for  
8 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
9 currency is subject to forfeiture.

10          5.       Accordingly, the parties agree that the deadline by which the United States shall be  
11 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
12 alleging that the defendant currency is subject to forfeiture shall be extended to December 18, 2017.

13 Dated: 10/17/17

PHILLIP A. TALBERT  
United States Attorney

14  
15 By: /s/ Kevin C. Khasigian  
16 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

17  
18 Dated: 10/17/17

/s/ Richard Anderson  
RICHARD ANDERSON  
Potential Claimant, *In Propria Persona*

19  
20 IT IS SO ORDERED.

21 Dated: October 18, 2017

  
22 WILLIAM B. SHUBB  
23 UNITED STATES DISTRICT JUDGE  
24  
25  
26  
27  
28