

1 McGREGOR W. SCOTT
2 United States Attorney
3 KEVIN C. KHASIGIAN
4 Assistant U. S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

5 | Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

V.

APPROXIMATELY \$21,540.00 IN U.S.
CURRENCY,

Defendant.

2:17-MC-00172-KJM-KJN

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

It is hereby stipulated by and between the United States of America and potential claimants Steve L. Thomas and Paul Bryce Wells (“claimants”), appearing *in propria persona*, as follows:

1. On or about August 14, 2017, claimant Paul Bryce Wells filed a claim in the administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the Approximately \$21,540.00 in U.S. Currency (hereafter “defendant currency”), which was seized on April 18, 2017.

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

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 proceeding, unless the court extends the deadline for good cause shown or by agreement of the
4 parties. That deadline was November 12, 2017.

5 4. By Stipulation and Order filed November 14, 2017, the parties stipulated to extend to
6 December 12, 2017, the time in which the United States is required to file a civil complaint for forfeiture
7 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
8 subject to forfeiture.

9 5. By Stipulation and Order filed November 22, 2017, the parties stipulated to extend to
10 January 12, 2018, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
12 subject to forfeiture.

13 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
14 to February 8, 2018, 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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1 7. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to February 8, 2018.

4 Dated: 1/8/18

McGREGOR W. SCOTT
United States Attorney

5 By: /s/ Kevin C. Khasigian
6 KEVIN C. KHASIGIAN
7 Assistant U.S. Attorney

8 Dated: 1/8/18

9 /s/ Steve L. Thomas
10 STEVE L. THOMAS
11 Potential Claimant
12 Appearing *in propria persona*

13 (Signature authorized by phone)

14 Dated: 1/8/18

15 /s/ Paul Bryce Wells
16 PAUL BRYCE WELLS
17 Potential Claimant
18 Appearing *in propria persona*

19 (Signature authorized by phone)

IT IS SO ORDERED.

Dated: January 10, 2018



UNITED STATES DISTRICT JUDGE