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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 \$66,996.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:18-MC-00026-TLN-AC

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

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 17 It is hereby stipulated by and between the United States of America and potential claimant
 18 Samir Salem Acho (“Acho”), by and through their respective counsel of record, as follows:

19 1. On or about December 4, 2017, claimant Acho filed a claim in the administrative
 20 forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately
 21 \$66,996.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 12, 2017.

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

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
 28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline was March 4, 2018.

4 4. By Stipulation and Order filed March 2, 2018, the parties stipulated to extend to April 4,
5 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
9 extend to May 4, 2018, the time in which the United States is required to file a civil complaint for
10 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
11 currency is subject to forfeiture.

12 6. Accordingly, the parties agree that the deadline by which the United States shall be
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
14 alleging that the defendant currency is subject to forfeiture shall be extended to May 4, 2018.

15 Dated: 4/3/2018

MCGREGOR W. SCOTT
United States Attorney

17 /s/ Kevin C. Khasigian
18 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

19
20 Dated: 4/3/2018

/s/ Craig Ribbeck
21 CRAIG K. RIBBECK
Attorney for Samir Salem Acho
22 (As authorized via phone)

23 IT IS SO ORDERED.

24 Dated: April 9, 2018

25
26 
27 Troy L. Nunley
United States District Judge