

1 PHILLIP A. TALBERT  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant United States 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 \$9,000.00 IN U.S.  
CURRENCY, and

15 APPROXIMATELY \$8,980.00 IN U.S.  
16 CURRENCY,

17 Defendant.

2:19-MC-00099-MCE-EFB

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

18  
19 It is hereby stipulated by and between the United States of America and potential claimant Dustin  
20 Forkell (“claimant”), by and through their respective counsel, as follows:

21 1. On or about April 4, 2019, claimant filed claims in the administrative forfeiture proceeding  
22 with the U.S. Postal Inspection Service with respect to the Approximately \$9,000.00 in U.S. Currency and  
23 Approximately \$8,980.00 in U.S. Currency (hereafter “defendant currency”), which were seized on  
24 February 7, 2019.

25 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required  
26 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
27 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has  
28 filed a claim to the defendant currency as required by law in the 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 currency  
3 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
4 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
5 That deadline was July 3, 2019.

6           4.       By Stipulation and Order filed July 3, 2019, the parties stipulated to extend to October 1,  
7 2019, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
9 forfeiture.

10          5.       By Stipulation and Order filed September 26, 2019, the parties stipulated to extend to  
11 December 30, 2019, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
13 to forfeiture.

14          6.       By Stipulation and Order filed January 6, 2020, the parties stipulated to extend to February  
15 28, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
17 forfeiture.

18          7.       By Stipulation and Order filed March 5, 2020, the parties stipulated to extend to April 28,  
19 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
20 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
21 forfeiture.

22          8.       By Stipulation and Order filed April 29, 2020, the parties stipulated to extend to July 27,  
23 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
24 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
25 forfeiture.

26          9.       By Stipulation and Order filed July 28, 2020, the parties stipulated to extend to September  
27 25, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
28 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to

1 forfeiture.

2 10. By Stipulation and Order filed September 30, 2020, the parties stipulated to extend to  
3 December 21, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
4 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
5 to forfeiture.

6 11. By Stipulation and Order filed January 22, 2021, the parties stipulated to extend to February  
7 19, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
9 forfeiture.

10 12. By Stipulation and Order filed February 24, 2021, the parties stipulated to extend to April  
11 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
12 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
13 forfeiture.

14 13. By Stipulation and Order filed April 16, 2021, the parties stipulated to extend to June 18,  
15 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
17 forfeiture.

18 14. By Stipulation and Order filed June 14, 2021, the parties stipulated to extend to August 17,  
19 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
20 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
21 forfeiture.

22 15. By Stipulation and Order filed August 18, 2021, the parties stipulated to extend to  
23 November 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
25 to forfeiture.

26 16. By Stipulation and Order filed November 19, 2021, the parties stipulated to extend to  
27 February 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
28 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject

1 to forfeiture.

2 17. By Stipulation and Order filed February 16, 2022, the parties stipulated to extend to April  
3 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
4 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
5 forfeiture.

6 18. By Stipulation and Order filed April 20, 2022, the parties stipulated to extend to June 14,  
7 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
9 forfeiture.

10 19. By Stipulation and Order filed June 30, 2022, the parties stipulated to extend to July 14,  
11 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
12 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
13 forfeiture.

14 20. By Stipulation and Order filed July 21, 2022, the parties stipulated to extend to September  
15 12, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
17 forfeiture.

18 21. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to  
19 October 12, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
21 to forfeiture.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

