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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 \$44,141.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:19-MC-00171-KJM-DB

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

16
 17 The United States and potential claimant Alexander Akeem Williams (“claimant”), by and
 18 through his counsel, submit the following Stipulation and Order pursuant to the Court’s prior order in
 19 this case. The seizure forming the basis for this matter took place less than two years ago and the parties
 20 acknowledge the previous extensions given the COVID-19 pandemic. In recent weeks, the parties have
 21 engaged in settlement negotiations concerning the seizures. Accordingly, the parties seek only a brief
 22 sixty-day extension and believe that this will be the final request.

Good Cause

23
 24 The seizure in this case stems from an investigation and resulting seizure at the Sacramento airport
 25 of currency from the potential claimant. The potential claimant was traveling to Sacramento from
 26 Greensboro, South Carolina to purportedly visit friends and purchase property in California. The cash
 27 he carried in his luggage totaled \$44,141.00 and, according to the potential claimant, he had just sold a
 28 Nissan Titan truck for \$10,000.00 and a Cadillac vehicle for \$2,500.00. A drug dog trained to identify

1 the odor of narcotics on currency subsequently positively alerted to the cash transported from South
2 Carolina to Sacramento in May 2019.

3 Accordingly, the United States has committed substantial resources and time reviewing the claim,
4 investigative reports, and other records in this case, including criminal histories and employment reports.
5 Further, discussions to resolve evidentiary inquiries and settlement movement require coordination and
6 layers of conversation. Lastly, the seizure in this case took place on May 21, 2019 and referred to the
7 U.S. Attorney's Office on August 5, 2019, which was shortly before the shutdowns happened due to the
8 COVID-19 global pandemic. Offices have been closed and all discussions, negotiations, and approval
9 conferences have occurred remotely. Thus, the COVID-19 pandemic has had a significant impact on the
10 timing of this case and progressing the settlement negotiations in this matter.

11 **Stipulations**

12 1. On or about July 26, 2019, claimant Williams filed a claim in the administrative forfeiture
13 proceedings with the Drug Enforcement Administration with respect to the Approximately \$44,141.00
14 in U.S. Currency (hereafter "defendant currency"), which was seized on May 21, 2019.

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

20 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
21 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
22 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
23 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
24 the parties. That deadline was October 24, 2019.

25 4. By Stipulation and Order filed October 17, 2019, the parties stipulated to extend to
26 January 22, 2020, the time in which the United States is required to file a civil complaint for forfeiture
27 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
28 subject to forfeiture.

1 5. By Stipulation and Order filed January 28, 2020, the parties stipulated to extend to April
2 21, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
4 forfeiture.

5 6. By Stipulation and Order filed April 24, 2020, the parties stipulated to extend to July 20,
6 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
8 forfeiture.

9 7. By Stipulation and Order filed July 14, 2020, the parties stipulated to extend to October
10 19, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
11 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
12 forfeiture.

13 8. By Stipulation and Order filed October 20, 2020, the parties stipulated to extend to January
14 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
15 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
16 forfeiture.

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

21 10. By Stipulation and Order filed February 12, 2021, the parties stipulated to extend to April
22 19, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
23 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
24 forfeiture.

25 11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
26 to June 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture
27 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
28 subject to forfeiture.

