

1 PHILLIP A. TALBERT
Acting 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 \$15,000.00 IN
U.S. CURRENCY,

15 Defendant.

2:19-MC-00217-MCE-EFB

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 Ronald
18 Garvin (“claimant”), by and through their respective counsel, as follows:

19 1. On or about August 27, 2019, claimant filed a claim in the administrative forfeiture
20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$15,000.00 in U.S.
21 Currency (hereafter “defendant currency”), which was seized on June 6, 2019.

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

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline was November 25, 2019.

3 4. By Stipulation and Order filed January 6, 2020, the parties stipulated to extend to February
4 21, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. By Stipulation and Order filed February 21, 2020, the parties stipulated to extend to May
8 21, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. By Stipulation and Order filed May 21, 2020, the parties stipulated to extend to August 19,
12 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 7. By Stipulation and Order filed August 17, 2020, the parties stipulated to extend to October
16 19, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
18 forfeiture.

19 8. By Stipulation and Order filed October 22, 2020, the parties stipulated to extend to January
20 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
21 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
22 forfeiture.

23 9. By Stipulation and Order filed January 13, 2021, the parties stipulated to extend to February
24 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
25 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
26 forfeiture.

27 10. By Stipulation and Order filed February 12, 2021, the parties stipulated to extend to April
28 19, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
2 forfeiture.

3 11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to June
4 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 12. Accordingly, the parties agree that the deadline by which the United States shall be required
8 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
9 the defendant currency is subject to forfeiture shall be extended to June 18, 2021.

10 Dated: 4/16/21

PHILLIP A. TALBERT
Acting United States Attorney


11
12 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

13
14 Dated: 4/16/21

/s/ Mark J. Reichel
MARK J. REICHEL
Attorney for potential claimant
Ronald Garvin
(Signature authorized by email)

15
16
17 IT IS SO ORDERED.

18 Dated: April 27, 2021

19
20 
MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE