

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$28,360.00 IN U.S.
CURRENCY,

Defendant.

2:20-MC-00082-KJM-EFB

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 claimant Christopher Reyes (“Reyes”), appearing in *propria persona*, hereby agree and STIPULATE as follows:

1. On or about January 15, 2019, claimant Reyes filed a claim in the administrative forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately \$28,360.00 in U.S. Currency (hereafter “defendant currency”), which was seized on October 22, 2019.

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 the 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 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 April 14, 2020.

4 4. By Stipulation and Order filed April 10, 2020, the parties stipulated to extend to July 14,
5 2020, 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. By Stipulation and Order filed July 10, 2020, the parties stipulated to extend to August
9 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture against
10 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 6. By Stipulation and Order filed August 10, 2020, the parties stipulated to extend to
13 September 14, 2020, the time in which the United States is required to file a civil complaint for
14 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
15 currency is subject to forfeiture.

16 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
17 extend to October 13, 2020, the time in which the United States is required to file a civil complaint for
18 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
19 currency is subject to forfeiture.

20 8. Accordingly, the parties agree that the deadline by which the United States shall be
21 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
22 alleging that the defendant currency is subject to forfeiture shall be extended to October 13, 2020.

23 Dated: 9/11/2020

MCGREGOR W. SCOTT
United States Attorney

24
25 /s/ Kevin C. Khasigian
26 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

27
28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: 9/11/2020

/s/ Christopher Reyes
CHRISTOPHER REYES
Appearing in *Propria Persona*
(As authorized via phone)

IT IS SO ORDERED.

Dated: September 14, 2020.



CHIEF UNITED STATES DISTRICT JUDGE