

1 PHILLIP A. TALBERT  
 Acting United States Attorney  
 2 KEVIN C. KHASIGIAN  
 Assistant U. S. Attorney  
 3 501 I Street, Suite 10-100  
 Sacramento, CA 95814  
 4 Telephone: (916) 554-2700  
 5 Attorneys for the United States

8 IN THE UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
 12 Plaintiff,  
 13 v.  
 14 APPROXIMATELY \$111,720.00 IN  
 U.S. CURRENCY,  
 15 Defendant.

2:20-MC-00236-TLN-KJN  
 STIPULATION AND ORDER EXTENDING TIME  
 FOR FILING A COMPLAINT FOR FORFEITURE  
 AND/OR TO OBTAIN AN INDICTMENT  
 ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant  
 18 William J. Rienzi (“claimant”), by and through their respective counsel, as follows:

19 1. On or about June 23, 2020, claimant filed a claim in the administrative forfeiture  
 20 proceeding with the U.S. Customs and Border Protection with respect to the Approximately \$111,720.00  
 21 in U.S. Currency (hereafter “defendant currency”), which was seized on or about March 3, 2020.

22 2. The U.S. Customs and Border Protection 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 other  
 25 than claimant has filed a claim to the defendant currency as required by law in the administrative  
 26 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 proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
3 parties. That deadline was September 21, 2020.

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

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

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

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

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

24 9. By Stipulation and Order filed June 21, 2021, the parties stipulated to extend to July 16,  
25 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
26 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
27 forfeiture.

28 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend

1 to August 16, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
2 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
3 subject to forfeiture.

4 11. Accordingly, the parties agree that the deadline by which the United States shall be  
5 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
6 alleging that the defendant currency is subject to forfeiture shall be extended to August 16, 2021.

7 Dated: 7/16/2021

PHILLIP A. TALBERT  
Acting United States Attorney

8  
9 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

10  
11  
12 Dated: 7/16/2021

/s/ Samuel D. Berns  
SAMUEL D. BERNs  
Attorney for potential claimant  
William J. Rienzi

(Signature authorized by email)

13  
14  
15  
16  
17 **IT IS SO ORDERED.**

18 Dated: July 16, 2021

19  
20   
Troy L. Nunley  
United States District Judge