

1 PHILLIP A. TALBERT  
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

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 \$48,500.00 IN  
15 U.S. CURRENCY,

16 Defendant.

2:21-MC-00012-MCE-DB

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

17  
18 It is hereby stipulated by and between the United States of America and potential claimants  
19 Xiaobing Wang, Min Guo, and Lianfeng Li, (“claimants”), by and through their respective counsel as  
20 follows:

21 1. On or about October 22, 2020, claimants filed claims in the administrative forfeiture  
22 proceeding with the Department of Homeland Security, U.S. Customs and Border Protection (“CPB”)  
23 with respect to the Approximately \$48,500.00 in U.S. Currency (hereafter “defendant currency”), which  
24 was seized on or about August 26, 2020.

25 2. The CBP has sent the written notice of intent to forfeit required by 18 U.S.C. §  
26 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
27 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has filed a  
28 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  
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
4 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
5 parties. That deadline was January 20, 2021.

6           4.       By Stipulation and Order filed January 22, 2021, the parties stipulated to extend to April  
7 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
8 the 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 April 28, 2021, the parties stipulated to extend to June 18,  
11 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          6.       By Stipulation and Order filed June 21, 2021, the parties stipulated to extend to August  
15 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
16 the 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 August 17, 2021, the parties stipulated to extend to  
19 October 18, 2021, 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  
21 subject to forfeiture.

22          8.       By Stipulation and Order filed October 22, 2021, the parties stipulated to extend to  
23 December 17, 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  
25 subject to forfeiture.

26          9.       By Stipulation and Order filed December 22, 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

1 subject to forfeiture.

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

6 11. By Stipulation and Order filed May 25, 2022, the parties stipulated to extend to August  
7 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture against  
8 the 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 August 22, 2022, the parties stipulated to extend to  
11 November 14, 2022, the time in which the United States is required to file a civil complaint for  
12 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
13 currency is subject to forfeiture.

14 13. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
15 to January 13, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
17 subject to forfeiture.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1           14.     Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
3 alleging that the defendant currency is subject to forfeiture shall be extended to January 13, 2023.  
4

5 Dated: 11/9/2022

PHILLIP A. TALBERT  
United States Attorney

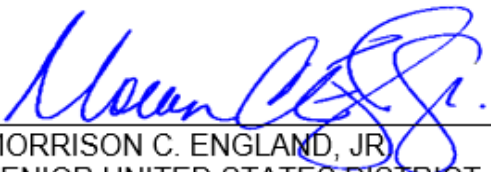
7 By: /s/ Kevin C. Khasigian  
8 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

10 Dated: 11/8/2022

11 /s/ Mark J. Reichel  
12 MARK J. REICHEL  
Attorney for potential claimants  
Xiaobing Wang, Min Guo, and Lianfeng Li  
(Signature authorized by email)

14 IT IS SO ORDERED.

15 Dated: November 16, 2022

16   
17 MORRISON C. ENGLAND, JR.  
18 SENIOR UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28