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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 \$61,502.00 IN U.S.
CURRENCY,

15 2018 CADILLAC ESCALADE, VIN:
16 1GYS4CKJ1JR704252, LICENSE NUMBER:
KMA5793,

17 2014 MASERATI QUATTROPORTE GTS,
18 VIN: ZAM56PPA6E1083054, LICENSE
NUMBER: 8HBE191,

19 YELLOW GOLD DIAMOND CUBAN LINK
20 CHAIN,

21 TWO-TONE GOLD DIAMOND DON
EXQUIZIT PENDANT,

22 YELLOW GOLD DIAMOND PLUG
23 RECORDS PENDANT,

24 YELLOW GOLD PRESIDENTIAL ROLEX
WATCH,

25 YELLOW GOLD DIAMOND PLUG DESIGN
26 RING, AND

27 YELLOW GOLD DIAMOND BAND,

28 Defendants.

2:21-MC-00071-MCE-KJN

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

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2 It is hereby stipulated by and between the United States of America and potential claimant Elton
3 Ward (“claimant”), by and through their respective counsel, as follows:

4 1. On or about January 3, 2021, claimant filed a claim in the administrative forfeiture
5 proceeding with the Drug Enforcement Administration with respect to the above-referenced assets
6 (hereafter “defendant assets”), which were seized on or about October 6, 2020.

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

12 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
13 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are
14 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
15 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
16 That deadline was April 2, 2021.

17 4. By Stipulation and Order filed March 9, 2021, the parties stipulated to extend to May 3,
18 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
19 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

20 5. By Stipulation and Order filed May 4, 2021, the parties stipulated to extend to June 2,
21 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
22 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

23 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
24 to August 31, 2021, the time in which the United States is required to file a civil complaint for forfeiture
25 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
26 to forfeiture.

27 7. Accordingly, the parties agree that the deadline by which the United States shall be

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1 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
2 alleging that the defendant assets are subject to forfeiture shall be extended to August 31, 2021.

3 Dated: 6/1/2021

PHILLIP A. TALBERT
Acting United States Attorney

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

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7 Dated: 5/28/2021

/s/ Daniel L. Olsen
DANIEL L. OLSEN
Attorney for potential claimant
Elton Ward

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9 (Signature authorized by phone)

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11 IT IS SO ORDERED.

12 Dated: June 4, 2021

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