

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,

2:21-MC-00097-MCE-AC

12 Plaintiff,

13 v.

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

14 APPROXIMATELY \$879,643.00 IN
U.S. CURRENCY,

15 ASSORTED MONEY ORDERS VALUED
16 AT \$6,000.00 IN U.S. CURRENCY,

17 Defendants.
18

19 It is hereby stipulated by and between the United States of America and potential claimants Maria
20 Gonzalez Sanchez and Jose Luis Mendoza Castillo (“claimants”), by and through their respective
21 counsel, as follows:

22 1. On or about January 3, 2021 and January 11, 2021, claimants filed claims in the
23 administrative forfeiture proceeding with the Federal Bureau of Investigation with respect to the
24 Approximately \$879,643.00 in U.S. Currency and Assorted Money Orders valued at \$6,000.00 in U.S.
25 Currency (hereafter collectively “defendant funds”), which were seized on or about October 1, 2020.

26 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
27 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
28 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has

1 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

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

7 4. By Stipulation and Order filed April 12, 2021, the parties stipulated to extend to July 1,
8 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

10 5. By Stipulation and Order filed July 21, 2021, the parties stipulated to extend to August 30,
11 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

13 6. By Stipulation and Order filed August 31, 2021, the parties stipulated to extend to
14 September 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
16 forfeiture.

17 7. By Stipulation and Order filed October 1, 2021, the parties stipulated to extend to
18 November 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture
19 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
20 forfeiture.

21 8. By Stipulation and Order filed December 6, 2021, the parties stipulated to extend to
22 January 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
24 forfeiture.

25 9. By Stipulation and Order filed February 4, 2022, the parties stipulated to extend to March
26 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
27 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

28 10. By Stipulation and Order filed March 31, 2022, the parties stipulated to extend to May 27,

1 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
2 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

3 11. By Stipulation and Order filed May 27, 2022, the parties stipulated to extend to July 26,
4 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

6 12. By Stipulation and Order filed July 28, 2022, the parties stipulated to extend to September
7 23, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

9 13. By Stipulation and Order filed September 27, 2022, the parties stipulated to extend to
10 October 24, 2022, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
12 forfeiture.

13 14. By Stipulation and Order filed October 25, 2022, the parties stipulated to extend to
14 December 23, 2022, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
16 forfeiture.

17 15. By Stipulation and Order filed December 27, 2022, the parties stipulated to extend to
18 January 23, 2023, the time in which the United States is required to file a civil complaint for forfeiture
19 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
20 forfeiture.

21 16. By Stipulation and Order filed January 25, 2023, the parties stipulated to extend to
22 February 22, 2023, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
24 forfeiture.

25 17. By Stipulation and Order filed February 22, 2023, the parties stipulated to extend to
26 March 24, 2023, the time in which the United States is required to file a civil complaint for forfeiture
27 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
28 forfeiture.

1 18. By Stipulation and Order filed March 24, 2023, the parties stipulated to extend to May 23,
2 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

4 19. By Stipulation and Order filed May 22, 2023, the parties stipulated to extend to August
5 21, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

7 20. By Stipulation and Order filed August 17, 2023, the parties stipulated to extend to October
8 20, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

10 21. By Stipulation and Order filed October 19, 2023, the parties stipulated to extend to
11 November 20, 2023, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
13 forfeiture.

14 22. By Stipulation and Order filed November 20, 2023, the parties stipulated to extend to
15 January 19, 2024, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
17 forfeiture.

18 23. By Stipulation and Order filed January 24, 2024, the parties stipulated to extend to
19 February 20, 2024, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 24. By Stipulation and Order filed February 26, 2024, the parties stipulated to extend to
23 March 21, 2024, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
25 forfeiture.

26 25. By Stipulation and Order filed March 21, 2024, the parties stipulated to extend to April
27 19, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
28 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

1 26. By Stipulation and Order filed April 19, 2024, the parties stipulated to extend to May 20,
2 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

4 27. By Stipulation and Order filed May 21, 2024, the parties stipulated to extend to June 19,
5 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

7 28. By Stipulation and Order filed June 24, 2024, the parties stipulated to extend to July 19,
8 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

10 29. By Stipulation and Order filed July 22, 2024, the parties stipulated to extend to August 19,
11 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

13 30. By Stipulation and Order filed August 19, 2024, the parties stipulated to extend to
14 September 18, 2024, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
16 forfeiture.

17 31. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
18 to October 18, 2024, the time in which the United States is required to file a civil complaint for forfeiture
19 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
20 forfeiture.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 32. 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 funds and/or to obtain an indictment
3 alleging that the defendant funds are subject to forfeiture shall be extended to October 18, 2024.

4 Dated: 9/16/2024

PHILLIP A. TALBERT
United States Attorney

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

7
8 Dated: 9/16/2024

/s/ Kenneth Rosenfeld
KENNETH ROSENFELD
Attorney for potential claimant
Maria Gonzalez Sanchez

9
10
11 Dated: 9/16/2024

/s/ Allen N. Sawyer
ALLEN N. SAWYER
Attorney for potential claimant
Jose Luis Mendoza Castillo

(Signatures authorized by email)

12
13
14
15 IT IS SO ORDERED.

16 DATED: September 24, 2024

17 
MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE