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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 \$12,700.00 IN  
U.S. CURRENCY,

15 Defendant.

2:21-MC-00157-WBS-JDP

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

16  
17 It is hereby stipulated by and between the United States of America and potential claimant  
18 Charles Robert Giglio (“claimant”), by and through their respective counsel, as follows:

19 1. On or about March 23, 2021, claimant filed a claim in the administrative forfeiture  
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately  
21 \$12,700.00 in U.S. Currency (hereafter “defendant currency”), which was seized on January 12, 2021.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a  
25 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
2 parties. That deadline was June 21, 2021.

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

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

11 6. By Stipulation and Order filed October 19, 2021, the parties stipulated to extend to  
12 November 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
14 subject to forfeiture.

15 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
16 December 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
18 subject to forfeiture.

19 8. Accordingly, the parties agree that the deadline by which the United States shall be  
20 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
21 alleging that the defendant currency is subject to forfeiture shall be extended to December 17, 2021.

22 Dated: 11/18/21

PHILLIP A. TALBERT  
Acting United States Attorney

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24 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

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Dated: 11/18/21

/s/ Isaac Safier  
ISAAC SAFIER  
Attorney for potential claimant  
Charles Robert Giglio  
(Signature authorized by email)

**IT IS SO ORDERED.**

Dated: November 18, 2021

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE