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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

2:22-MC-00225-WBS-JDP

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 \$79,527.22 IN U.S.
CURRENCY, and

15 APPROXIMATELY \$33,000.00 IN U.S.
16 CURRENCY,

17 Defendants.

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19 It is hereby stipulated by and between the United States of America and potential claimant Mario
20 Naranjo Gonzalez (“claimant”), by and through their respective counsel, as follows:

21 1. On or about April 25, 2022, the claimant filed a claim in the administrative forfeiture
22 proceedings with the Federal Bureau of Investigation with respect to the Approximately \$79,527.22 in
23 U.S. Currency (hereafter “defendant currency”), which was seized on October 15, 2021.

24 2. On or about May 26, 2022, the claimant filed a claim in the administrative forfeiture
25 proceedings with the Federal Bureau of Investigation with respect to the Approximately \$33,000.00 in
26 U.S. Currency (hereafter “defendant currency”), which was seized on March 16, 2022.

27 3. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
28 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a

1 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the
2 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture
3 proceeding.

4 4. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
5 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
6 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
7 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the
8 parties. Those deadlines were July 22, 2022, and August 24, 2022.

9 5. By Stipulation and Order filed July 22, 2022, the parties stipulated to extend to September
10 20, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
11 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
12 forfeiture.

13 6. By Stipulation and Order filed September 20, 2022, the parties stipulated to extend to
14 November 18, 2022, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
16 subject to forfeiture.

17 7. By Stipulation and Order filed November 9, 2022, the parties stipulated to extend to
18 January 17, 2023, the time in which the United States is required to file a civil complaint for forfeiture
19 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
20 subject to forfeiture.

21 8. By Stipulation and Order filed January 17, 2023, the parties stipulated to extend to
22 February 16, 2023, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
24 subject to forfeiture.

25 9. By Stipulation and Order filed February 15, 2023, the parties stipulated to extend to
26 March 16, 2023, the time in which the United States is required to file a civil complaint for forfeiture
27 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
28 subject to forfeiture.

1 10. By Stipulation and Order filed March 21, 2023, the parties stipulated to extend to April
2 14, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
4 forfeiture.

5 11. By Stipulation and Order filed April 13, 2023, the parties stipulated to extend to June 13,
6 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
8 forfeiture.

9 12. By Stipulation and Order filed June 9, 2023, the parties stipulated to extend to August 11,
10 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
11 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
12 forfeiture.

13 13. By Stipulation and Order filed August 21, 2023, the parties stipulated to extend to
14 September 8, 2023, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
16 subject to forfeiture.

17 14. By Stipulation and Order filed September 6, 2023, the parties stipulated to extend to
18 October 6, 2023, the time in which the United States is required to file a civil complaint for forfeiture
19 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
20 subject to forfeiture.

21 15. By Stipulation and Order filed October 5, 2023, the parties stipulated to extend to
22 November 6, 2023, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
24 subject to forfeiture.

25 16. By Stipulation and Order filed November 3, 2023, the parties stipulated to extend to
26 December 6, 2023, the time in which the United States is required to file a civil complaint for forfeiture
27 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
28 subject to forfeiture.

1 17. By Stipulation and Order filed December 4, 2023, the parties stipulated to extend to
2 January 5, 2024, the time in which the United States is required to file a civil complaint for forfeiture
3 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
4 subject to forfeiture.

5 18. By Stipulation and Order filed December 29, 2023, the parties stipulated to extend to
6 March 5, 2024, the time in which the United States is required to file a civil complaint for forfeiture
7 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
8 subject to forfeiture.

9 19. By Stipulation and Order filed March 6, 2024, the parties stipulated to extend to April 4,
10 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
11 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
12 forfeiture.

13 20. By Stipulation and Order filed April 4, 2024, the parties stipulated to extend to May 3,
14 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
15 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
16 forfeiture.

17 21. By Stipulation and Order filed May 6, 2024, the parties stipulated to extend to May 31,
18 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
19 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
20 forfeiture.

21 22. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
22 to June 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
24 subject to forfeiture.

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1 23. 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 June 28, 2024.

4 Dated: 5/30/24

PHILLIP A. TALBERT
United States Attorney


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

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8 Dated: 5/30/24

/s/ Jakrun Sodhi
JAKRUN SODHI
Attorney for potential claimant
Mario Naranjo Gonzalez
(Signature authorized by email)

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12 **IT IS SO ORDERED.**

13 Dated: June 3, 2024



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE