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United States Attorney
KEVIN C. KHASIGIAN
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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$86,386.34 IN U.S.
CURRENCY SEIZED FROM WELLS
FARGO BANK ACCOUNT NUMBER 837-
8529088,

APPROXIMATELY \$75,799.17 IN U.S.
CURRENCY SEIZED FROM WELLS
FARGO BANK ACCOUNT NUMBER 237-
4897144,

APPROXIMATELY \$12,487.89 IN U.S.
CURRENCY SEIZED FROM WELLS
FARGO BANK ACCOUNT NUMBER 837-
7300564,

APPROXIMATELY \$40,000.00 IN U.S.
CURRENCY SEIZED FROM WELLS
FARGO BANK ACCOUNT NUMBER 840-
2798287,

APPROXIMATELY \$4,779.21 IN U.S.
CURRENCY SEIZED FROM WELLS
FARGO BANK ACCOUNT NUMBER 837-
7299931,

APPROXIMATELY \$22,560.00 IN U.S.
CURRENCY SEIZED FROM WELLS
FARGO BANK ACCOUNT NUMBER 522-
9480073,

2:12-MC-00084-MCE-CKD

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

1 APPROXIMATELY \$16,300.00 IN U.S.
2 CURRENCY SEIZED FROM WELLS
3 FARGO BANK ACCOUNT NUMBER 688-
4 7162441,

5 APPROXIMATELY \$2,315.48 IN U.S.
6 CURRENCY SEIZED FROM WELLS
7 FARGO BANK ACCOUNT NUMBER 837-
8 7300341,

9 APPROXIMATELY \$6,705.79 IN U.S.
10 CURRENCY SEIZED FROM U.S. BANK
11 ACCOUNT NUMBER 1-534-6593-5705,

12 APPROXIMATELY \$23,437.76 IN U.S.
13 CURRENCY SEIZED FROM U.S. BANK
14 ACCOUNT NUMBER 1-534-9727-8140,

15 APPROXIMATELY \$8,270.00 IN U.S.
16 CURRENCY,

17 APPROXIMATELY \$12,290.00 IN U.S.
18 CURRENCY,

19 APPROXIMATELY \$7,874.00 IN U.S.
20 CURRENCY,

21 APPROXIMATELY \$9,600.00 IN U.S.
22 CURRENCY,

23 APPROXIMATELY \$41,820.00 IN U.S.
24 CURRENCY,

25 APPROXIMATELY \$4,980.00 IN U.S.
26 CURRENCY,

27 APPROXIMATELY \$22,057.00 IN U.S.
28 CURRENCY,

ASSORTED JEWELRY VALUED AT
\$178,675.00,

ASSORTED JEWELRY VALUED AT
\$32,000.00,

2010 HARLEY DAVIDSON ROAD GLIDE
TOURING MOTORCYCLE, VIN:
1HD1KH43XAB656597, CALIFORNIA
LICENSE: 20J4782,

2011 HARLEY DAVIDSON ROAD GLIDE
TOURING MOTORCYCLE, VIN:

1 1HD1KH435BB605168, CALIFORNIA
2 LICENSE: 20M0719,

3 2011 HARLEY DAVIDSON ROAD GLIDE
4 TOURING MOTORCYCLE, VIN:
1HD1KH431BB627068, CALIFORNIA
5 LICENSE: 20M5789,

6 2003 HARLEY DAVIDSON FXDXT
7 MOTORCYCLE, VIN:
1HD1GLV153K315113, CALIFORNIA
8 LICENSE: 18E3564,

9 2009 LAND ROVER RANGE ROVER, VIN:
10 SALSH23469A210503, CALIFORNIA
11 LICENSE: 6HXA254,

12 2010 GMC SAVANA CONVERSION VAN
13 EXPLORER, VIN: 1GDZGMBG3A1138479,
14 CALIFORNIA LICENSE: 6KTW397,

15 2012 ELIMINATOR SPEEDSTER BOAT,
16 VIN: ELBA0131G112, CALIFORNIA
17 VESSEL NUMBER: CF0818RR,

18 2012 EXTREME CARRIER TRAILER, VIN:
19 5DBUP28381R000028, CALIFORNIA
20 LICENSE: 4LU8888,

21 2008 NORDIC 28-FOOT POWER BOAT
22 WITH 2004 TRAILER, VIN: NDC86722G708,
23 CALIFORNIA VESSEL NUMBER:
24 CF5317RN,

25 2007 TRACKER TARGA 17 SPORT BOAT
26 WITH 2004 TRAILER, VIN: BUJ64228C707,
27 CALIFORNIA VESSEL NUMBER:
28 CF3895RN,

SIG SAUER MOSQUITO 22 CALIBER
SEMI-AUTOMATIC HANDGUN, SERIAL
NUMBER: F011198,

GLOCK 45 CALIBER, MODEL 21
HANDGUN, SERIAL NUMBER: MRX665,
WITH AMMUNITION,

GLOCK 40 CALIBER, MODEL 23 SEMI-
AUTOMATIC HANDGUN, SERIAL
NUMBER: GDZ776, WITH AMMUNITION,

SMITH AND WESSON, MODEL AR-15
RIFLE, SERIAL NUMBER: 97540, WITH
AMMUNITION, AND

2008 FORD F-350 CREW CAB TRUCK, VIN:
1FTWW31R88EA64972, CALIFORNIA
LICENSE: 8N24680,

Defendants.

It is hereby stipulated by and between the United States of America and Claimants Steven Ortega, Sr., Steven Ortega, Jr., Anthony Winters, Richard Serrell, Steven M. Adgate, Andrea Vickery, Justin McMillan, Jason Siegfried, Ashley Owles, Derek Winters, Anthony Giarrusso and Marla Ortega, by and through their respective attorneys, and Thomas and Denise Hohn, in *propria persona* ("Claimants"), as follows:

1. The following table details the claimant, assets, dates in which claims were filed in the administrative forfeiture proceedings with either the Internal Revenue Service – Criminal Investigation ("IRS-CI") or the U.S. Drug Enforcement Administration ("DEA") and the dates the defendant assets were seized:

Claimant	Asset	Claim Rec'd	Complaint Due	Agency	Date Seized
Anthony Winters	Approximately \$86,386.34 in USC seized from Wells Fargo Bank	7/30/2012	10/28/2012	IRS-CI	5/16/2012
Steven and Marla Ortega	Approximately \$86,386.34 in USC seized from Wells Fargo Bank	8/06/2012	11/04/2012	IRS-CI	5/16/2012
Anthony Winters	Approximately \$75,799.17 in USC seized from Wells Fargo Bank	7/30/2012	10/28/2012	IRS-CI	5/16/2012
Steven and Marla Ortega	Approximately \$75,799.17 in USC seized from Wells Fargo Bank	8/06/2012	11/04/2012	IRS-CI	5/16/2012
Anthony Winters	Approximately \$12,487.89 in USC seized from Wells Fargo Bank	7/30/2012	10/28/2012	IRS-CI	5/16/2012
Steven and Marla Ortega	Approximately \$12,487.89 in USC seized from Wells Fargo Bank	8/06/2012	11/04/2012	IRS-CI	5/16/2012
Steven and Marla Ortega	Approximately \$22,560.00 in USC seized from Wells Fargo Bank	8/06/2012	11/04/2012	IRS-CI	5/16/2012
Steven and Marla Ortega	Approximately \$16,300.00 in USC seized from Wells Fargo Bank	8/06/2012	11/04/2012	IRS-CI	5/16/2012
Steven and Marla Ortega	Approximately \$2,315.48 in USC seized from Wells Fargo Bank	8/06/2012	11/04/2012	IRS-CI	5/16/2012
Steven and Marla Ortega	Approximately \$6,705.79 in USC seized from US Bank	8/06/2012	11/04/2012	IRS-CI	5/16/2012

Claimant	Asset	Claim Filed	Complaint Due	Agency	Date Seized
Steven and Marla Ortega	Approximately \$23,437.76 in USC seized from US Bank	8/06/2012	11/04/2012	IRS-CI	5/16/2012
Steven Ortega, Jr.	Approximately \$23,437.76 in USC seized from US Bank	8/07/2012	11/05/2012	IRS-CI	5/16/2012
Anthony Winters	Approximately \$8,270.00 in USC	7/30/2012	10/28/2012	DEA	5/16/2012
Anthony Winters	Approximately \$12,290.00 in USC	7/30/2012	10/28/2012	DEA	5/16/2012
Steven and Marla Ortega	Approximately \$12,290.00 in USC	8/06/2012	11/04/2012	DEA	5/16/2012
Steven and Marla Ortega	Approximately \$7,874.00 in USC	8/06/2012	11/04/2012	DEA	5/16/2012
Richard Serrell	Approximately \$9,600.00 in USC	8/02/2012	10/31/2012	DEA	5/16/2012
Steven Ortega, Jr.	Approximately \$41,820.00 in USC	8/03/2012	11/01/2012	DEA	5/16/2012
Steven and Marla Ortega	Approximately \$4,980.00 in USC	8/06/2012	11/04/2012	DEA	5/16/2012
Steven and Marla Ortega	Approximately \$22,057.00 in USC	8/06/2012	11/04/2012	DEA	5/16/2012
Steven and Marla Ortega	Approximately \$57,642.00 in USC	8/06/2012	11/04/2012	DEA	5/16/2012
Richard Serrell	Assorted Jewelry Valued at \$178,675.00	8/02/2012	10/31/2012	DEA	5/16/2012
Andrea Vickery	Assorted Jewelry Valued at \$32,000.00	8/17/2012	11/15/2012	DEA	5/16/2012
Steven Ortega, Jr.	Assorted Jewelry Valued at \$32,000.00	8/03/2012	11/01/2012	DEA	5/16/2012
Steven and Marla Ortega	2010 Harley Davidson Road Glide Touring Motorcycle, 6597	8/06/2012	11/04/2012	DEA	5/16/2012
Thomas and Denise Hohn	2010 Harley Davidson Road Glide Touring Motorcycle, 6597	8/16/2012	11/14/2012	DEA	5/16/2012
Steven Ortega, Jr.	2011 Harley Davidson Road Glide Touring Motorcycle, 5168	8/03/2012	11/01/2012	DEA	5/16/2012
Steven Ortega, Jr.	2011 Harley Davidson Road Glide Touring Motorcycle, 7068	8/03/2012	11/01/2012	DEA	5/16/2012
Derek Winters	2009 Land Rover Range Rover	8/02/2012	10/31/2012	DEA	5/16/2012
Richard Serrell	2010 GMC Savana Conversion Van Explorer	8/02/2012	10/31/2012	DEA	5/16/2012
Steven Ortega, Jr.	2012 Eliminator Speedster Boat	8/03/2012	11/01/2012	DEA	5/16/2012
Steven Adgate	2012 Eliminator Speedster Boat	8/15/2012	11/13/2012	DEA	5/16/2012
Steven Ortega, Jr.	2012 Extreme Carrier Trailer	8/03/2012	11/01/2012	DEA	5/16/2012
Richard Serrell	2008 Nordic 28-Foot Power Boat with 2004 Trailer	8/02/2012	10/31/2012	DEA	5/16/2012
Steven and Marla Ortega	Sig Sauer Mosquito 22 Caliber Semi-Automatic handgun	8/06/2012	11/04/2012	DEA	5/16/2012

Claimant	Asset	Claim Filed	Complaint Due	Agency	Date Seized
Jason Siegfried	Glock 40 Caliber, Model 23 Semi-Automatic Handgun	8/15/2012	11/13/2012	DEA	5/16/2012
Ashley Owles	Glock 40 Caliber, Model 23 Semi-Automatic Handgun	8/15/2012	11/13/2012	DEA	5/16/2012
Justin McMillian	Smith & Wesson, Model AR-15 Rifle	8/13/2012	11/11/2012	DEA	5/16/2012
Anthony Giarrusso	2008 Ford F-350 Crew Cab Truck	10/15/2012	1/13/2013	DEA	5/16/2012

2. The Internal Revenue Service – Criminal Investigation and the U.S. Drug Enforcement Administration have sent written notice of the intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant assets under 18 U.S.C. § 983(a)(2)(A) (E), and no person other than Claimants have filed a claim to the defendant assets as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties. The deadlines for each of the defendant assets are listed above, with the earliest date of October 28, 2012.

4. By Stipulation and Order filed October 18, 2012, the parties stipulated to extend to January 25, 2013, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

5. By Stipulation and Order filed January 15, 2013, the parties stipulated to extend to April 12, 2013, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

6. By Stipulation and Order filed April 15, 2013, the parties stipulated to

1 extend to July 12, 2013, the time in which the United States is required to file a civil
2 complaint for forfeiture against the defendant assets and/or to obtain an indictment
3 alleging that the defendant assets are subject to forfeiture.

4 7. By Stipulation and Order filed July 12, 2013, the parties stipulated to
5 extend to October 11, 2013, the time in which the United States is required to file a civil
6 complaint for forfeiture against the defendant assets and/or to obtain an indictment
7 alleging that the defendant assets are subject to forfeiture.

8 8. By Stipulation and Order filed October 11, 2013, the parties stipulated to
9 extend to January 9, 2014, the time in which the United States is required to file a civil
10 complaint for forfeiture against the defendant assets and/or to obtain an indictment
11 alleging that the defendant assets are subject to forfeiture.

12 9. By Stipulation and Order filed January 7, 2014, the parties stipulated to
13 extend to April 9, 2014, the time in which the United States is required to file a civil
14 complaint for forfeiture against the defendant assets and/or to obtain an indictment
15 alleging that the defendant assets are subject to forfeiture.

16 10. By Stipulation and Order filed April 11, 2014, the parties stipulated to
17 extend to July 8, 2014, the time in which the United States is required to file a civil
18 complaint for forfeiture against the defendant assets and/or to obtain an indictment
19 alleging that the defendant assets are subject to forfeiture.

20 11. By Stipulation and Order filed July 22, 2014, the parties stipulated to
21 extend to October 6, 2014, the time in which the United States is required to file a civil
22 complaint for forfeiture against the defendant assets and/or to obtain an indictment
23 alleging that the defendant assets are subject to forfeiture.

24 12. By Stipulation and Order filed October 7, 2014, the parties stipulated to
25 extend to January 5, 2015, the time in which the United States is required to file a civil
26 complaint for forfeiture against the defendant assets and/or to obtain an indictment
27 alleging that the defendant assets are subject to forfeiture.

28 13. By Stipulation and Order filed January 7, 2015, the parties stipulated to

1 extend to April 6, 2015, the time in which the United States is required to file a civil
2 complaint for forfeiture against the defendant assets and/or to obtain an indictment
3 alleging that the defendant assets are subject to forfeiture.

4 14. By Stipulation and Order filed April 8, 2015, the parties stipulated to extend
5 to July 6, 2015, the time in which the United States is required to file a civil complaint for
6 forfeiture against the defendant assets and/or to obtain an indictment alleging that the
7 defendant assets are subject to forfeiture.

8 15. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to
9 extend to October 5, 2015, the time in which the United States is required to file a civil
10 complaint for forfeiture against the defendant assets and/or to obtain an indictment
11 alleging that the defendant assets are subject to forfeiture.

12 16. Accordingly, the parties agree that the deadline by which the United States
13 shall be required to file a complaint for forfeiture against the defendant assets and/or to
14 obtain an indictment alleging that the defendant assets are subject to forfeiture shall be
15 extended to October 5, 2015.

16 DATE: 7/2/2015

BENJAMIN B. WAGNER
United States Attorney

17
18 By: /s/ Kevin C. Khasigian
19 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

20 DATE: 7/2/2015

/s/ Carolyn M. Hagin
21 CAROLYN M. HAGIN
22 Attorney for Claimant Anthony Winters
(Authorized via email)

23 DATE: 7/1/2015

/s/ Benjamin D. Galloway
24 BENJAMIN D. GALLOWAY
25 Attorney for Claimant Steven Ortega, Sr.
(Authorized via email)

26 DATE: 7/1/2015

/s/ Darryl Stallworth
27 DARRYL STALLWORTH
28 Attorney for Claimant Richard Serrell
(Authorized via email)

1 DATE: 7/1/2015

/s/ William J. Portanova
WILLIAM J. PORTANOVA
Attorney for Claimant Steven Adgate
(Authorized via email)

5 DATE: 7/1/2015

/s/ Randy Sue Pollock
RANDY SUE POLLOCK
Attorney for Claimant Steven Ortega, Jr.
(Authorized via email)

8 DATE: 7/1/2015

/s/ Randy Sue Pollock
RANDY SUE POLLOCK
Attorney for Claimant Andrea Vickery
(Authorized via email)

11 DATE: 7/1/2015

/s/ Russell S. Humphrey
RUSSELL S. HUMPHREY
Attorney for Claimant Derek Winters
(Authorized via email)

14 DATE: 7/2/2015

/s/ James R. Greiner
JAMES R. GREINER
Attorney for Claimants
Jason Siegfried and Ashley Owles
(Authorized via email)

17 DATE: 7/1/2015

/s/ Scott N. Cameron
SCOTT N. CAMERON
Attorney for Claimant Justin McMillian
(Authorized via email)

20 DATE: 7/1/2015

/s/ Hayes H. Gable III
HAYES H. GABLE III
Attorney for Claimant Anthony Giarrusso
(Authorized via email)

23 DATE: 7/1/2015

/s/ Shari Rusk
SHARI RUSK
Attorney for Claimant Marla Ortega
(Authorized via email)

26 DATE: 7/1/2015

/s/ Thomas Hohn
THOMAS HOHN
Claimant, Appearing in *propria persona*
(Authorized via email)

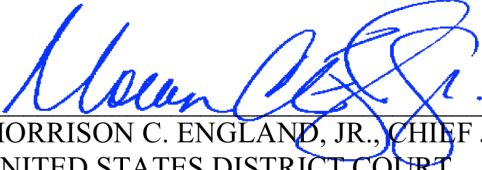
1 DATE: 7/1/2015

/s/ Denise Hohn
DENISE HOHN
Claimant, Appearing in *propria persona*
(Authorized via email)

5 **ORDER**

6 IT IS SO ORDERED.

7 Dated: July 8, 2015

8 
9 MORRISON C. ENGLAND, JR., CHIEF JUDGE
10 UNITED STATES DISTRICT COURT
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