

1 BENJAMIN B. WAGNER
 United States Attorney
 2 JEAN M. HOBLER
 Assistant U.S. Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2700

5
 6
 7

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

10

11 UNITED STATES OF AMERICA,)	2:11-MC-00033-FCD-DAD
)	
12 Plaintiff,)	
)	
13 v.)	
)	STIPULATION AND ORDER EXTENDING
14 APPROXIMATELY \$86,500 IN U.S.)	TIME FOR FILING A COMPLAINT FOR
CURRENCY SEIZED FROM WELLS FARGO)	FORFEITURE AND/OR TO OBTAIN AN
15 BANK ACCOUNT NUMBER 2067165197,)	INDICTMENT ALLEGING FORFEITURE
)	
16 Defendant.)	
)	
17 _____)	

18 It is hereby stipulated by and between the United States of
 19 America and claimant Farhad Dezaki ("claimant"), by and through
 20 their respective attorneys, as follows:

21 1. On or about February 1, 2011, claimant filed a claim, in
 22 the administrative forfeiture proceedings, with the Internal
 23 Revenue Service with respect to the Approximately \$86,500.00 in
 24 U.S. Currency seized from Wells Fargo Bank Account Number
 25 2067165197 (the "defendant funds"), which were seized on or about
 26 December 7, 2010.

27 2. The Internal Revenue Service has sent the written notice
 28 of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all

1 known interested parties. The time has expired for any person to
2 file a claim to the defendant funds under 18 U.S.C. §
3 983(a)(2)(A)-(E), and no person other than the claimant has filed
4 a claim to the defendant funds as required by law in the
5 administrative forfeiture proceeding.

6 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is
7 required to file a complaint for forfeiture against the defendant
8 funds and/or to obtain an indictment alleging that the defendant
9 funds are subject to forfeiture within 90 days after a claim has
10 been filed in the administrative forfeiture proceedings, unless
11 the court extends the deadline for good cause shown or by
12 agreement of the parties. That deadline is currently May 2, 2011.

13 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish
14 by agreement to extend to December 1, 2011, the time in which the
15 United States is required to file a civil complaint for forfeiture
16 against the defendant funds and/or to obtain an indictment
17 alleging that the defendant funds are subject to forfeiture.

18 5. Accordingly, the parties agree that the deadline by which
19 the United States shall be required to file a complaint for
20 forfeiture against the defendant funds and/or to obtain an

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 indictment alleging that the defendant funds are subject to
2 forfeiture shall be extended to December 1, 2011.

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BENJAMIN B. WAGNER
United States Attorney

DATE: March 29, 2011

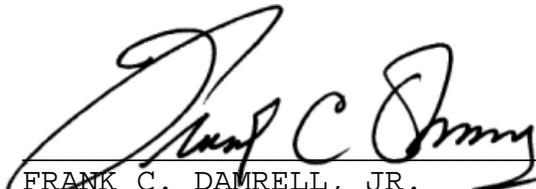
/s/ Jean M. Hobler
JEAN M. HOBLER
Assistant U.S. Attorney

DATE: March 29, 2011

/s/ Patrick K. Hanly
PATRICK K. HANLY
Attorney for Claimant
Farhad Dezaki
(As authorized on 3/29/2011)

IT IS SO ORDERED.

DATE: April 4, 2011


FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE