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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 \$66,379.31 IN U.S.
CURRENCY SEIZED FROM GOLDEN
15 ONE CREDIT UNION ACCOUNT
NUMBER 1321409-2, AND

16 APPROXIMATELY \$3,905.03 IN U.S.
17 CURRENCY SEIZED FROM GOLDEN
ONE CREDIT UNION ACCOUNT
18 NUMBER 909462-0,

19 Defendants.

2:12-MC-00081-WBS-KJN

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

20
21 It is hereby stipulated by and between the United States of America and claimant Abbas M.
22 Tourzani, in *propria persona* (“claimant”), as follows:

23 1. On or about July 26, 2012, claimant Abbas M. Tourzani filed a claim, in the
24 administrative forfeiture proceedings, with the Internal Revenue Service - Criminal Investigation
25 with respect to the Approximately \$66,379.31 in U.S. Currency seized from Golden One Credit
26 Union account number 1321409-2 and Approximately \$3,905.0331 in U.S. Currency seized from
27 Golden One Credit Union account number 909462-0 (hereafter “defendant funds”), which were
28 seized on June 19, 2012.

1 2. The Internal Revenue Service - Criminal Investigation has sent the written notice of
2 intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has
3 expired for any person to file a claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and
4 no person other than the claimant has filed 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 required to file a complaint for
7 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant
8 funds are subject to forfeiture within ninety days after a claim has been filed in the administrative
9 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement
10 of the parties. That deadline is October 24, 2012.

11 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an
12 extension to December 19, 2012, the time in which the United States is required to file a civil
13 complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the
14 defendant funds are subject to forfeiture.

15 5. Accordingly, the parties agree that the deadline by which the United States shall be
16 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
17 alleging that the defendant funds are subject to forfeiture shall be extended to December 19, 2012.

18 Dated: 10/11/12

BENJAMIN B. WAGNER
United States Attorney


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

22 Dated: 10/11/12

/s/ Abbas M. Tourzani
ABBAS M. TOURZANI
Claimant *in propria persona*
(Authorized via telephone on 10/11/12)

25 IT IS SO ORDERED.

Dated: October 11, 2012


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE