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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,

2:12-MC-00081-WBS-KJN

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.

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

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 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 was October 24, 2012.

11          4.       By Stipulation and Order filed October 10, 2012, the parties stipulated to extend to  
12 December 19, 2012, the time in which the United States is required to file a civil complaint for  
13 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant  
14 funds are subject to forfeiture.

15          4.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an  
16 extension to March 19, 2013, the time in which the United States is required to file a civil complaint  
17 for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant  
18 funds are subject to forfeiture.

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