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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 \$37,719.00 IN U.S.
CURRENCY,

15 APPROXIMATELY \$96,409.27 SEIZED
16 FROM CHASE BANK ACCOUNT
NUMBER 105589805, HELD IN THE
17 NAME OF MEDITERRANEAN
MARKET, and

18 APPROXIMATELY \$18,623.98 SEIZED
19 FROM GOLDEN ONE CREDIT UNION
ACCOUNT NUMBER 1290544, HELD IN
20 THE NAMES OF BASSAM ADEEB
ABUGHAZALEH AND SAHAR
21 ABUGHAZALEH,

22 Defendants.

2:17-MC-00152-KJM-EFB

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

23
24 It is hereby stipulated by and between the United States of America and potential claimants
25 Bassam Adeeb Abughazaleh, Sahar Abughazaleh, and Kayed Bouri (“claimants”), by and through their
26 counsel, as follows:

27 1. On July 18, 2017, claimants filed a claims in the administrative forfeiture proceeding with
28 the U.S. Secret Service with respect to the Approximately \$37,719.00 in U.S. Currency, Approximately

1 \$96,409.27 seized from Chase Bank Account Number 105589805, held in the name of Mediterranean
2 Market, and Approximately \$18,623.98 seized from Golden One Credit Union Account Number
3 1290544, held in the names of Bassam Adeeb Abughazaleh and Sahar Abughazaleh (hereafter “defendant
4 funds”), which were seized on or about April 27, 2017.

5 2. The U.S. Secret Service has sent the written notice of intent to forfeit required by 18
6 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim
7 to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has filed a
8 claim to the defendant funds as required by law in the administrative forfeiture proceeding.

9 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
10 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
11 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
12 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
13 That deadline was October 16, 2017.

14 4. By Stipulation and Order filed October 19, 2017, the parties stipulated to extend to
15 November 15, 2017, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
17 forfeiture.

18 5. By Stipulation and Order filed November 14, 2017, the parties stipulated to extend to
19 December 15, 2017, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 6. By Stipulation and Order filed December 15, 2017, the parties stipulated to extend to
23 February 13, 2018, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
25 forfeiture.

26 7. By Stipulation and Order filed March 26, 2018, the parties stipulated to extend to May 14,
27 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
28 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

1 8. By Stipulation and Order filed May 16, 2018, the parties stipulated to extend to August
2 13, 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

4 9. By Stipulation and Order filed August 8, 2018, the parties stipulated to extend to
5 November 12, 2018, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
7 forfeiture.

8 10. By Stipulation and Order filed November 7, 2018, the parties stipulated to extend to
9 February 11, 2019, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
11 forfeiture.

12 11. By Stipulation and Order filed February 7, 2019, the parties stipulated to extend to May
13 13, 2019, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

15 12. By Stipulation and Order filed May 13, 2019, the parties stipulated to extend to August
16 12, 2019, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

18 13. By Stipulation and Order filed August 5, 2019, the parties stipulated to extend to
19 November 11, 2019, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 14. By Stipulation and Order filed November 8, 2019, the parties stipulated to extend to
23 February 10, 2020, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
25 forfeiture.

26 15. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May
27 11, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
28 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

1 16. 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 funds and/or to obtain an indictment
3 alleging that the defendant funds are subject to forfeiture shall be extended to May 11, 2020.

4 Dated: 1/30/2020

MCGREGOR W. SCOTT
United States Attorney


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

7
8 Dated: 1/30/2020

/s/ David D. Fischer & Kelly Babineau
DAVID D. FISCHER
KELLY BABINEAU
Attorneys for potential claimants Bassam Adeb
Abughazaleh, Sahar Abughazaleh, and Kayed Bouri
(As authorized by email)

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12 **IT IS SO ORDERED.**

13 Dated: February 4, 2020.

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CHIEF UNITED STATES DISTRICT JUDGE