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5 Attorneys for the United States

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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.      By Stipulation and Order filed February 4, 2020, the parties stipulated 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.     As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
2 August 10, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
3 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
4 forfeiture.

5           17.     Accordingly, the parties agree that the deadline by which the United States shall be  
6 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
7 alleging that the defendant funds are subject to forfeiture shall be extended to August 10, 2020.

8 Dated: 5/1/2020

MCGREGOR W. SCOTT  
United States Attorney

9  
10 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

11  
12 Dated: 5/1/2020

/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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16           **IT IS SO ORDERED.**

17 Dated: 5/11/2020

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CHIEF UNITED STATES DISTRICT JUDGE