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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 NET PROCEEDS FROM THE SALE OF OTHER  
 TOBACCO PRODUCTS LOCATED AT 6255 MCLEOD  
 15 DRIVE, SUITE 13, LAS VEGAS, NEVADA 89120,  
 16 NET PROCEEDS FROM THE SALE OF OTHER  
 TOBACCO PRODUCTS LOCATED AT 10879  
 17 PORTAL DRIVE, SUITE B, LOS ALAMITOS,  
 CALIFORNIA 90720, and  
 18 APPROXIMATELY \$41,274.49 SEIZED FROM WELLS  
 19 FARGO BANK ACCOUNT NUMBER 5422109032,  
 20 TITLED IN THE NAME 21<sup>ST</sup> CENTURY  
 DISTRIBUTION,  
 21 Defendants.

2:17-MC-00195-TLN-EFB

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

22 It is hereby stipulated by and between the United States of America and potential claimant  
 23 Rahman Lakhani (“claimant”), by and through their respective counsel, as follows:

24 1. On or about September 21, 2017, the Bureau of Alcohol, Tobacco, Firearms and  
 25 Explosives (“ATF”) seized Other Tobacco Products located at 6255 McLeod Drive, Suite 13, Las  
 26 Vegas, Nevada and Other Tobacco Products located at 10879 Portal Drive, Suite B, Los Alamitos,  
 27 California (“defendant OTP”). On or about October 16, 2017, ATF seized Approximately  
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1 \$41,274.49 seized from Wells Fargo Bank Account Number 5422109032, titled in the name 21<sup>st</sup>  
2 Century Distribution (hereafter “defendant currency”).

3           2.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
4 forfeiture against the defendant OTP and defendant currency and/or to obtain an indictment alleging  
5 that the defendant OTP and defendant currency are subject to forfeiture within ninety days after  
6 seizure of an asset, unless the court extends the deadline for good cause shown or by agreement of the  
7 parties. That deadline was December 20, 2017.

8           3.       By Stipulation and Order filed January 2, 2018, the parties stipulated to extend to  
9 March 20, 2018, the time in which the United States is required to file a civil complaint for forfeiture  
10 against the defendant OTP and defendant currency and/or to obtain an indictment alleging that the  
11 defendant OTP and defendant currency are subject to forfeiture.

12           4.       By Stipulation and Order filed March 28, 2018, the parties stipulated to extend to June  
13 18, 2018, the time in which the United States is required to file a civil complaint for forfeiture against  
14 the defendant OTP and defendant currency and/or to obtain an indictment alleging that the defendant  
15 OTP and defendant currency are subject to forfeiture.

16           5.       By Stipulation and Order filed June 26, 2018, the parties stipulated to extend to  
17 September 17, 2018, the time in which the United States is required to file a civil complaint for  
18 forfeiture against the defendant OTP and defendant currency and/or to obtain an indictment alleging  
19 that the defendant OTP and defendant currency are subject to forfeiture.

20           6.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
21 extend to December 17, 2018, the time in which the United States is required to file a civil complaint  
22 for forfeiture against the defendant OTP and defendant currency and/or to obtain an indictment  
23 alleging that the defendant OTP and defendant currency are subject to forfeiture.

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1           7.       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 OTP and defendant currency and/or to  
3 obtain an indictment alleging that the defendant OTP and defendant currency are subject to forfeiture  
4 shall be extended to December 17, 2018.

5 DATED: 9/11/2018

McGREGOR W. SCOTT  
United States Attorney

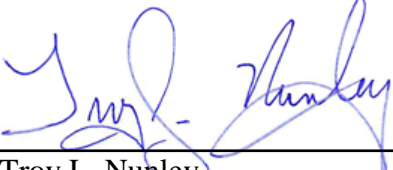
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7 By: /s/ Kevin C. Khasigian  
8 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

9  
10 DATED: 9/11/2018

/s/ Patrick Hanly  
11 PATRICK HANLY  
Attorney for Rahman Lakhani  
12 (As authorized via email)

13 IT IS SO ORDERED.

14 Dated: September 14, 2018

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17 Troy L. Nunley  
United States District Judge