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7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**
 9

10 UNITED STATES OF AMERICA,)	2:17-CV-344
)	
11 Plaintiff,)	
)	
12 v.)	
)	
13 \$417,073.00 IN UNITED STATES)	United States' Unopposed Application To
CURRENCY seized from the premises of)	Continue CAFRA Deadline
2656 North Ontario Street, Las Vegas)	
14 Nevada;)	
)	
15 \$28,230.05 IN UNITED STATES)	
CURRENCY seized from J.P. Morgan)	
16 Chase Account No. xxxxxxx2849;)	
)	
17 \$21,146.37 in UNITED STATES)	
CURRENCY seized from J.P. Morgan)	
18 Chase Bank Account No. xxxxxx5561;)	
)	
19 Defendants.)	

20 COMES NOW The United States of America and moves this Court to extend the
 21 CAFRA (Civil Asset Forfeiture Reform Act) deadline for 60 days or until April 11, 2017.
 22 This motion is unopposed by Claimants' Counsel.

23 Pursuant to 18 U.S.C. 983 (a)(2)(E), the United States has 90 days to file a civil
 24 complaint, if an interested party files a timely administrative claim with the seizing
 25 agency. In this case, Customs and Border Patrol seized the above referenced defendants
 26 on August 17, 2016; and the claimants, Zalmi and Sona Basharyar, filed administrative

1 claims with the Department of Homeland Security (United States Customs and Border
2 Patrol) on November 10, 2016. As such, the United States was/is obliged to file a civil
3 complaint by February 10, 2017.

4 The Government requests a continuance of that February 10, 2017, deadline until
5 April 10, 2017. For its grounds the Government states that it continues to investigate this
6 case, involving the seizure of large quantities of analogue drugs (“spice”) from the
7 business premises of G-One Smoke Shop as well as over \$450,000.00 in monetary assets
8 (specified in the caption above) from the residential premises of the owner of that smoke
9 shop (Zalmai Basharyar) and bank accounts linked to Basharyar, personally, and/or
10 corporate bank accounts maintained by G-One. Government investigators have yet to
11 complete their analysis of what will largely, if not exclusively, be a financial case, to wit:
12 was/is the seized currency derived from legitimate sources or from drug-dealing. To
13 resolve that issue, investigators need to pore over volumes of financial documents and
14 bank records. Their task is not yet complete and, as such, the Government cannot make
15 an informed assessment of whether there exists a preponderance of evidence that would
16 justify filing a civil complaint.

17 Accordingly, the United States requests an additional 60 days (or until April 11,
18 2017) to complete its financial analysis and determine whether to file a complaint in this
19 matter.

20 Counsel for the Government has consulted with the Claimants’ counsel, Gabriel
21 Grasso, and he has authorized Government counsel to represent to this Court that he does
22 not object to this motion.

23 This motion is not submitted solely for the purpose to delay or for any other
24 improper purpose.

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