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

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

20 COMES NOW the United States of America and moves this Court to extend the CAFRA
 21 (Civil Asset Forfeiture Reform Act) deadline for the Government to file its forfeiture complaint,
 22 in rem, for 90 days, or until June 16, 2018. The current CAFRA deadline for the Government to
 23 file its complaint is March 18, 2017.

24 This is the Government’s Eighth request for an extension of the CAFRA deadline.
 25 Initially, this Court granted a 90-day continuance until April 11, 2017. The parties have agreed
 26 to previous extensions of time as they fastidiously attempt to resolve their differences regarding

1 this seizure of nearly one-half million dollars in monetary assets. This iteration of a continuance
2 motion is based upon the Government's actions to procure business bank records for G-One
3 Smoke Shop and personal bank records for Zalamai Basharyar, the owner of G-One Smoke Shop
4 and the administrative claimant of all of the seized cash.

5 This motion is unopposed by Claimants' Counsel.

6 Pursuant to 18 U.S.C. 983(a)(2)(E), the United States has 90 days to file a civil
7 complaint, if an interested party files a timely administrative claim with the seizing agency. In
8 this case, Customs and Border Patrol seized the above-referenced defendant monetary assets on
9 August 17, 2016; and the claimants, Zalamai and Sona Basharyar, filed administrative claims
10 with the Department of Homeland Security (United States Customs and Border Patrol) on
11 November 10, 2016. As such, the United States was obliged to file its civil complaint in this
12 case by February 10, 2017. As the parties have continued to wade through the reams and
13 volumes of documents in this case, the Government has made additional, periodic, continuance
14 motions (stipulated to by opposing counsel) to accommodate that voluminous search and
15 analysis.

16 Since this Court granted the most recent continuance motion on December 20, 2017, the
17 Government has, with Mr. Basharyar's consent, and pursuant to this Court's order, ordered all of
18 Mr. Basharyar's JP Morgan Chase bank records from Chase's out-of-state data processing
19 facility in Indianapolis, Indiana. Mr. Basharyar had already given the Government his Chase
20 bank records from 2011 to present; but to thoroughly assess the case—since Mr. Basharyar
21 claims that he was making large sums of legitimate income dating back to 2005-03—the
22 Government requested Chase to research and retrieve all of Mr. Basharyar's bank records dating
23 back from the establishment of both his personal and corporate accounts. It took Chase several
24 weeks to retrieve, copy and transport those records from Indianapolis to Las Vegas. The United
25 States Attorney's office finally received those records on February 24, 2018. That record
26 production constitutes hundreds of pages of documents. Although the Government received the

1 documents from Chase a week ago, the financial analyst who will analyze these records has been
2 out of town on training since their receipt by the Government. He will not be able to begin
3 analyzing those records until March 5, 2018, when he returns to his office. In conjunction with
4 his other assigned tasks it will take him several weeks to review these documents and to produce
5 a synthesized conclusion as to their efficacy in reaching a settlement in this case. Analysis of all
6 of Mr. Basharyar's bank records, both those that he has provided and those that had to be
7 retrieved and produced by Chase, is necessary to determine the accuracy and authenticity of the
8 Claimants' assertion about the source of their income.

9 As noted above, verification and analysis of the records will facilitate the settlement
10 discussions one way or the other regarding the extent to which the seized funds can be traced to
11 legitimate (or illegitimate) sources. Once the bank records have been analyzed, the parties will
12 be able to make an informed decision as to whether the case can be settled or whether a trial is
13 necessary.

14 Accordingly, the United States requests an additional 90 days (or until June 16, 2018) to
15 complete its financial analysis and determine whether to file a complaint in this matter.

16 Counsel for the Government has consulted with the Claimants' counsel, Gabriel Grasso,
17 and he has authorized Government counsel to represent to this Court that he does not object to
18 this motion.

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

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