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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,)	
)	
12	v.)	
)	
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;)	(Second Request)
)	
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 June 11, 2017.

22 This is the Government's second request for an extension of the CAFRA deadline.

23 This motion is unopposed by Claimants' Counsel.

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

1 on August 17, 2016; and the claimants, Zalmi and Sona Basharyar, filed administrative
2 claims with the Department of Homeland Security (United States Customs and Border
3 Patrol) on November 10, 2016. As such, the United States was obliged to file its civil
4 complaint in this case by February 10, 2017. In an uncontested motion filed on February
5 3, 2017, the United States requested an additional sixty (60) days to file a civil forfeiture
6 complaint in this case because it (the United States) was still in the process of
7 determining whether there was/is sufficient evidence to file such a complaint. The United
8 States was (and still is) gathering evidence to determine whether it can meet the burden
9 of the preponderance of evidence necessary to file a complaint.

10 In addition, Claimants' counsel, in the person of Gabriel Grasso, has advised
11 counsel for the United States that he (Grasso) is reviewing significant quantities of bank
12 records that he would like to present to the Government to stave off a civil and/or
13 criminal filing, or to, at least, provide a basis for settlement discussions. In that regard,
14 Claimants' counsel joins in this request so that he and the Government may continue to
15 investigate this matter.

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

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

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

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WHEREFORE, for all of the reasons stated above, the United States moves this Court to continue the CAFRA deadline sixty (60) days or until June 11, 2017.

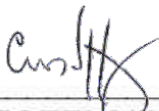
Dated: April 4, 2017

STEVEN W. MYHRE
Acting United States Attorney

/s/ Michael A. Humphreys
MICHAEL A. HUMPHREYS
Assistant United States Attorney

IT IS SO ORDERED.

DATED: April 5, 2017



C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE

A copy of the foregoing was served upon counsel of record on April 4, 2017 by

First Class Mail:

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/s/ Heidi L. Skillin
HEIDI L. SKILLIN
FSA Paralegal

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