UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| UNITED STATES OF AMERICA | : | **STIPULATION AND ORDER** |
| - v. - | : | 26 Civ. 3014 (LJL) |
| $540,964.57 IN UNITED STATES CURRENCY FORMERLY ON DEPOSIT IN REGIONS BANK ACCOUNT NUMBER 0339845141 HELD IN THE NAME OF ATA ABRISHAMI, DVM INC.; | : | |
| $92,278.67 IN UNITED STATES CURRENCY ON DEPOSIT IN REGIONS BANK ACCOUNT NUMBER 0334791248 HELD IN THE NAME OF CARLA S. JOHNSTON; AND | : | |
| $19,617.99 IN UNITED STATES CURRENCY ON DEPOSIT IN REGIONS BANK ACCOUNT NUMBER 0320739923 HELD IN THE NAME OF MASONDE TRAORE, | : | |
| Defendants-*in-rem*. | : | |

WHEREAS, on or about April 13, 2026, the United States commenced an *in rem* forfeiture action by the filing of a Verified Civil Complaint for Forfeiture (the "Verified Complaint"), seeking the forfeiture of the following:

a. $540,964.57 in United States currency formerly on deposit in Regions Bank account number 0339845141, held in the name of Ata Abrishami, Dvm, Inc.;

b. $92,278.67 in United States currency formerly on deposit in Regions Bank account number 0334791248, held in the name of Carla S. Johnston; and

c. $19,617.99 in United States currency formerly on deposit in Regions Bank account number 0320739923, held in the name of Masonde Traore

(a. through c., collectively, the "Defendants-*in-rem*");

WHEREAS, on or about April 30, 2026, Finance ERC West Inc. (the "Claimant"), through counsel, Justin V. Shur, Esq., filed a claim (the "Petition) asserting an interest in the Defendants-*in-rem*; and

WHEREAS, the United States and the Claimant (collectively, the "Parties") have agreed to resolve their respective interests in the Defendants-*in-rem* without further litigation;

NOW THEREFORE, IT IS HEREBY STIPULATED, AGREED AND ORDERED, by and between the United States of America, by its attorney Jay Clayton, United States Attorney, Connie L. Dang, Assistant United States Attorney, of counsel, and the Claimant, by its attorney, Justin V. Shur, Esq, that:

1. The Claimant has a superior interest in the Defendants-*in-rem* pursuant to Title 18, United States Code, Section 983, and the Government shall not seek to further forfeit the Defendants-*in-rem*.

2. Upon entry of this Stipulation and Order, the United States Marshals Service ("USMS") shall return the Defendants-*in-rem* to the Claimant in a manner agreed upon by the Parties.

3. The terms of this Stipulation and Order shall be subject to approval by the Court. Violation of any terms of conditions herein shall be constructed as a violation of an Order of the Court.

4. The Claimant is hereby barred from asserting, or assisting others in asserting, any claim, including third-party claims and any claim for attorney's fees and costs, against the United States or any of its agents and employees, including USMS, the Federal Bureau of Investigation ("FBI"), and the United States Attorney's Office for the Southern District of New York ("USAO-SDNY"), as well as any and all employees, officers, and agents of the USMS, FBI,

and USAO-SDNY in connection with, or arising out of, the United States' seizure, restraint, custody, or control of the Defendants-*in-rem*.

5. The Claimant agrees to hold harmless the United States, USMS, FBI, USAO-SDNY, and any and all employees, officers, and agents of said entities from any and all third-party claims of ownership of the Defendants-*in-rem*.

6. The Government's agreement to this Stipulation and Order is expressly premised upon the truthfulness, accuracy and completeness in every material part of the representations made by counsel for the Claimant.

7. Each party signing this Stipulation and Order warrants that they are authorized to sign this Stipulation and Order on behalf of the party for whom their signature appears.

8. The Parties hereby waive all rights to challenge or contest the validity of this Stipulation and Order.

9. Each party shall bear its own costs and attorney's fees.

10. This Stipulation and Order constitutes the complete agreement of the parties and may not be amended without express written authorization from all parties.

11. This Court shall have exclusive jurisdiction over the interpretation and enforcement of this Stipulation and Order.

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12. The signature page of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: _____ 7/21/2026
Connie Dang DATE
Assistant United States Attorney
26 Federal Plaza, 37th Floor
New York, NY 10278
(212) 637- 2543

FINANCE ERC WEST INC.

By: _____ 7/21/2026
Justin V. Shur, Esq. DATE
Counsel for Claimant
Liu Shur Kravis LLP
607 14th Street, NW, Suite 625
Washington, DC 20005
(202) 240-7102

SO ORDERED:

_____ 7/21/2026
HONORABLE LEWIS J. LIMAN DATE
UNITED STATES DISTRICT JUDGE