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5 UNITED STATES DISTRICT COURT FOR THE  
6 WESTERN DISTRICT OF WASHINGTON  
7 AT SEATTLE

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 DEBRA HESLOP

12 Defendant.

NO. 2: 20-cv-1736-RSL

**CONSENT DECREE AND FINAL  
JUDGMENT**

13 **CONSENT DECREE AND FINAL JUDGMENT**

14 Plaintiff, United States of America (“Plaintiff”), commenced the above-captioned action in  
15 this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Debra  
16 Heslop, is committing or about to commit a banking law violation as defined in 18 U.S.C.  
17 § 3322(d), including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B).

18 Plaintiff and Defendant, *pro se*, wish to resolve Plaintiff’s allegations without litigation and  
19 jointly request and consent to the entry of this Consent Decree and Final Judgment (“Consent  
20 Decree”) without Defendant’s admission of liability or wrongdoing. Defendant agrees to waive  
21 service of the Summons and the Complaint.

22 Defendant has entered into this Consent Decree freely and without coercion. Defendant  
23 further acknowledges that she has read the provisions of this Consent Decree, understands them,  
and is prepared to abide by them.

1 **IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:**

2 1. This Court has jurisdiction over this matter and the parties pursuant to  
3 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under  
4 28 U.S.C. § 1391(b) and (c).

5 2. Defendant neither admits nor denies the allegations in the Complaint. Only for  
6 purposes of this action, Defendant admits the facts necessary to establish jurisdiction.

7 3. For purposes of this Consent Decree:

8 a. “Defendant” means Debra Heslop.

9 b. “Person” means an individual, a corporation, a partnership, or any other  
10 entity.

11 c. “Funds” include any currency, check, money order, stored value card,  
12 stored value card numbers, bank wire transmission, or other monetary value.

13 d. “Money transmitting business” refers to a person who, for a fee, receives  
14 funds from one person for the purpose of transmitting the funds, or providing access to the  
15 funds, to another person.

16 e. “Fee” refers to a payment or compensation of any kind regardless of how  
17 the payment or compensation is labeled, including but not limited to processing fees,  
18 service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and  
19 gratuities.

20 4. Upon entry of this Decree, Defendant is permanently prohibited and enjoined  
21 from, directly or indirectly, assisting, facilitating, or participating in any money transmitting  
22 business.

1           5.       Within five (5) days after entry of this Consent Decree, the Defendant is ordered  
2 to submit to Postal Inspector Amy Kerkof a written acknowledgement of receipt of this Consent  
3 Decree sworn under penalty of perjury. The statement shall be addressed to:

4           U.S. Postal Inspector Amy Kerkof  
5           U.S. Postal Inspection Service  
6           P.O. Box 400  
7           Seattle, WA 98111  
8           206-442-6132 (desk)

9           6.       The Consent Decree shall not be modified except in writing by Plaintiff and the  
10 Defendant and approved by the Court.

11           7.       This Consent Decree shall constitute a final judgment and order in this action.

12           8.       This Court retains jurisdiction of this action for the purpose of enforcing or  
13 modifying this Consent Decree and for the purpose of granting such additional relief as may be  
14 necessary or appropriate.  
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**APPROVED AND ENTERED BY THIS COURT**

Dated this 30th day of November, 2020.

*MM S Lasnik*  
HONORABLE ROBERT S. LASNIK  
United States District Judge

We hereby consent to the entry of the foregoing Decree:

**FOR DEFENDANT DEBRA HESLOP**

Dated: Nov 5, 2020 *Debra Heslop*  
DEBRA HESLOP

**FOR PLAINTIFF THE UNITED STATES OF AMERICA**

BRIAN MORAN  
United States Attorney

Dated: November 24, 2020 By: *s/Nickolas Bohl*  
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