

The Honorable Robert J. Bryan

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEEDREANNE OTERO

Defendant.

NO. 3:20-cv-6164-RJB

**CONSENT DECREE AND FINAL  
JUDGMENT**

**CONSENT DECREE AND FINAL JUDGMENT**

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

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

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

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

5 1. This Court has jurisdiction over this matter and the parties pursuant to  
6 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under  
7 28 U.S.C. § 1391(b) and (c).

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

10 3. For purposes of this Consent Decree:

11 a. “Defendant” means Deedreanne Otero.

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

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

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

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

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

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

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

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

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

13 8. This Court retains jurisdiction of this action for the purpose of enforcing or  
14 modifying this Consent Decree and for the purpose of granting such additional relief as may be  
15 necessary or appropriate.

16  
17 **APPROVED AND ENTERED BY THIS COURT**

18 Dated this 23<sup>rd</sup> day of December, 2020.

19   
20

21 ROBERT J. BRYAN  
22 United States District Judge  
23

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

We hereby consent to the entry of the foregoing Decree:

**FOR DEFENDANT DEEDREANNE OTERO**

Dated: November 24, 2020

Deedreanne Otero  
DEEDREANNE OTERO

**FOR PLAINTIFF THE UNITED STATES OF AMERICA**

BRIAN MORAN  
United States Attorney

Dated: November 30, 2020

By: s/ Nicholas Bohl  
NICKOLAS BOHL, WA #48978  
Assistant United States Attorney  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Fax: 206-553-4067  
Email: [nickolas.bohl@usdoj.gov](mailto:nickolas.bohl@usdoj.gov)