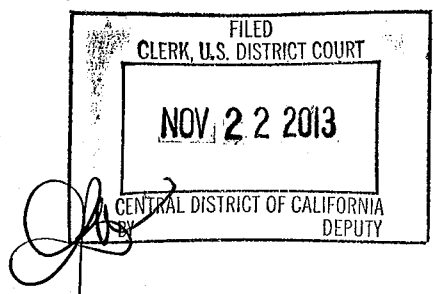


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JS6



11 Attorneys for Plaintiff  
 12 UNITED STATES OF AMERICA

13 UNITED STATES DISTRICT COURT  
 14 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
 15 WESTERN DIVISION

16 UNITED STATES OF AMERICA,	)	No. CV 08-03306-GHK (SHx)
	)	
17 Plaintiff,	)	<del>PROPOSED</del>
	)	
18 vs.	)	<b>CONSENT JUDGMENT OF FORFEITURE</b>
	)	
19 \$2,525,059.70 IN U.S. CURRENCY,	)	
20 \$29,500.00 IN EUROS, \$2,500.00	)	
IN TRAVELERS CHECKS AND	)	
21 \$125,435.62 IN BANK FUNDS,	)	
	)	
22 Defendants.	)	
	)	
23 LAMONT BENNETT, JILL JOHNSON	)	
BENNETT and LIGHT UP LIFE	)	
24 ENTERTAINMENT, INC.,	)	
	)	
25 Claimants.	)	

26 On or about May 19, 2008, Plaintiff United States of  
 27 America ("the government," "the United States of America" or  
 28 "plaintiff") filed a Complaint for Forfeiture alleging that the

1 defendants \$2,525,059.70 in U.S. Currency,<sup>1</sup> \$29,500.00 in Euros,  
2 \$2,500.00 in Travelers Checks and \$125,435.62 in Bank Funds  
3 (collectively, the "defendants") are subject to forfeiture  
4 pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) and 984 and 21  
5 U.S.C. § 881(a)(6).

6 On or about July 14, 2008, claimants Lamont Bennett, Jill  
7 Johnson Bennett and Light Up Life Entertainment, Inc.  
8 (collectively, "claimants") filed their respective claims to  
9 various defendants. More specifically, claimant Lamont Bennett  
10 filed a claim to \$1,380,862.00, \$14,238.35, \$5,474.35 and  
11 \$300,000.00, respectively, of the defendant \$2,525,059.70 in  
12 U.S. Currency; defendant \$29,500.00 in Euros; defendant  
13 \$2,500.00 in Travelers Checks; and defendant \$125,435.62 in Bank  
14 Funds. Claimant Jill Johnson Bennett filed a claim to  
15 \$1,380,862.00, \$14,238.35, \$5,474.35 and \$300,000.00,  
16 respectively, of the defendant \$2,525,059.70 in U.S. Currency;  
17 defendant \$29,500.00 in Euros; defendant \$2,500.00 in Travelers  
18 Checks; and defendant \$125,435.62 in Bank Funds. Claimant Light  
19 Up Life Entertainment, Inc. filed a claim to \$824,485.00 out of  
20 the defendant \$2,525,059.70 in U.S. Currency. Claimants filed  
21 their respective answers to the Complaint for Forfeiture on or  
22 about August 1, 2008.

23  
24  
25 <sup>1</sup> The defendant \$2,525,059.70 in U.S. Currency consists of  
26 \$1,380,862.00 seized on or about August 29, 2007 from the  
27 Tarzana, California residence of Lamont Bennett, \$824,485.00  
28 seized on or about August 29, 2007 from the 2007 Audi S8 which  
Lamont Bennett was driving, \$14,238.85 seized on or about August  
29, 2007 from a male purse situated inside the 2007 Audi S8,  
\$5,474.35 seized on or about August 29, 2007 from Lamont Bennett  
himself and \$300,000.00 seized on or about August 31, 2007 from  
Safe Deposit Box Number 2714 at HSBC Bank USA, 16311 Ventura  
Boulevard, Encino, California.

1 No other parties have appeared in this case and the time for  
2 filing claims and answers has expired.

3 The government and claimants are also parties in a related  
4 civil forfeiture action, entitled United States of America v.  
5 \$475,000.00 in Bank Funds, Case No. CV 08-05260-GHK(SHx) (the  
6 "related civil forfeiture litigation"), in which Lamont Bennett  
7 and Jill Johnson Bennett have filed claims to the defendant  
8 \$475,000.00 in Bank Funds and answered the complaint.

9 The government and claimants have now agreed to a global  
10 settlement of this action and the related civil forfeiture  
11 litigation, and to avoid further litigation by entering into  
12 this Consent Judgment of Forfeiture.

13 The Court, having been duly advised of and having  
14 considered the matter, and based upon the mutual consent of the  
15 parties hereto,

16 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

17 1. This Court has jurisdiction over the subject matter of  
18 this action and the parties to this Consent Judgment of  
19 Forfeiture.

20 2. The Complaint for Forfeiture states a claim for relief  
21 pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) and 984 and 21  
22 U.S.C. § 881(a)(6).

23 3. Notice of this action has been given as required by  
24 law. No appearances have been made in the litigation by any  
25 person other than claimants. The Court deems that all other  
26 potential claimants admit the allegations of the Complaint for  
27 Forfeiture to be true.

28 / / /

1           4.     \$1,380,862.00 and \$824,485.00, respectively, of the  
2 defendant \$2,525,059.70 in U.S. Currency, plus the interest  
3 earned by the United States of America on \$1,380,862.00 and  
4 \$824,485.00, respectively, of the defendant \$2,525,059.70 in  
5 U.S. Currency, shall be condemned and forfeited to the United  
6 States of America, which shall dispose of those funds in  
7 accordance with law.

8           5.     The remainder of the defendants (i.e., \$14,238.85,  
9 \$5,474.35 and \$300,000.00 of the defendant \$2,525,059.70 in U.S.  
10 Currency; defendant \$29,500.00 in Euros; defendant \$2,500.00 in  
11 Travelers Checks; and defendant \$125,435.62 in Bank Funds), plus  
12 all interest earned by the United States of America on  
13 \$14,238.85, \$5,474.35 and \$300,000.00 of the defendant  
14 \$2,525,059.70 in U.S. Currency; defendant \$29,500.00 in Euros;  
15 defendant \$2,500.00 in Travelers Checks; and defendant  
16 \$125,435.62 in Bank Funds (collectively, the "Non-Forfeited  
17 Funds") shall be returned to claimants Lamont Bennett and Jill  
18 Johnson Bennett.

19           6.     The funds to be returned to claimants Lamont Bennett  
20 and Jill Johnson Bennett pursuant to paragraph 5 above shall be  
21 paid to them by electronic transfer directly into the client  
22 trust account of Paul Gabbert, Esq., attorney of record for  
23 claimants in this case. Claimants Lamont Bennett and Jill  
24 Johnson Bennett (through their attorney of record Paul Gabbert,  
25 Esq.) shall provide all information and complete all documents  
26 requested by the United States of America in order for the  
27 United States of America to complete the transfer including,  
28 without limitation, providing claimants' attorney of record's

1 taxpayer identification number, and the identity of the bank,  
2 the bank's address and the account name, account number, account  
3 type and wire transfer routing number for the Paul Gabbert  
4 client trust account to which the transfer of funds is to be  
5 made.

6       7.     The forfeiture of the \$1,380,862.00 and \$824,485.00,  
7 respectively, of the defendant \$2,525,059.70 in U.S. Currency,  
8 plus the interest earned by the United States of America on  
9 those monies (as provided in paragraph 4 above) does not  
10 constitute and shall not be construed as a payment of any taxes  
11 (including income taxes), fines or other obligations which may  
12 be owed by any of the claimants, and this Consent Judgment of  
13 Forfeiture does not in any way affect any existing tax  
14 (including income tax), fine, liability or other debt owed by  
15 any of the claimants. Notwithstanding anything to the contrary  
16 in this Consent Judgment of Forfeiture (including, without  
17 limitation, paragraphs 5 and 6 above pertaining to the return of  
18 the Non-Forfeited Funds), nothing contained in this Consent  
19 Judgment of Forfeiture shall be deemed to restrict, waive, limit  
20 or otherwise prejudice in any way any rights of the United  
21 States of America (or any of its departments, agencies,  
22 representatives or designees) to seize, attach, levy on or by  
23 any other means take possession of any or all of the Non-  
24 Forfeited Funds, in order to satisfy any tax (including income  
25 tax), fine, liability or other debt owed by any of the  
26 claimants, before those funds are returned to claimants Lamont  
27 Bennett and Jill Johnson Bennett by electronic transfer (as  
28 provided in paragraph 6 above). Should the United States of

1 America (or any of its departments, agencies, representatives or  
2 designees) undertake such action as to any or all of the Non-  
3 Forfeited Funds, the affected Non-Forfeited Funds shall not be  
4 physically returned to claimants Lamont Bennett  
5 and Jill Johnson Bennett by electronic transfer (as provided in  
6 paragraph 6) or otherwise.

7 8. Claimants, and each of them, on behalf of themselves  
8 and each of their respective officers, directors, shareholders,  
9 employees, agents, representatives, heirs, successors and  
10 assigns (if any) hereby release the United States of America,  
11 its agencies, agents, officers, employees and representatives,  
12 including, without limitation, all agents, officers, employees  
13 and representatives of the Drug Enforcement Administration, the  
14 Department of Justice and their respective agencies, as well as  
15 all agents, officers, employees and representatives of any state  
16 or local governmental or law enforcement agency involved in the  
17 investigation or prosecution of this matter, from any and all  
18 claims, actions, or liabilities arising out of or related to  
19 this action, including, without limitation, any claim for  
20 attorney fees, costs, and interest, which may be asserted by or  
21 on behalf of claimants, or any of them, whether pursuant to 28  
22 U.S.C. § 2465 or otherwise.

23 9. The Court finds that there was reasonable cause for  
24 the seizure of the defendants and institution of these  
25 proceedings. This judgment shall be construed as a certificate  
26 of reasonable cause pursuant to 28 U.S.C. § 2465.

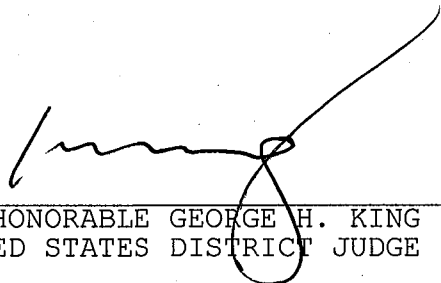
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1           10. The Court further finds that claimants did not  
2 substantially prevail in this action, and the parties hereto  
3 shall bear their own attorney fees and costs.

4           11. This Consent Judgment of Forfeiture is contingent upon  
5 the Court's entry of the consent judgment of forfeiture lodged  
6 contemporaneously herewith in the related civil forfeiture  
7 litigation.

8  
9 DATED: 11/21/13

  
\_\_\_\_\_

THE HONORABLE GEORGE H. KING  
UNITED STATES DISTRICT JUDGE

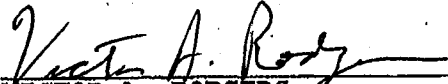
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CONSENT

The parties hereto consent to the above Consent Judgment of Forfeiture and waive any right of appeal.

DATED: 10/28, 2013


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United States Attorney  
ROBERT E. DUGDALE  
Assistant United States Attorney  
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STEVEN R. WELK  
Assistant United States Attorney  
Chief, Asset Forfeiture Section

  
VICTOR A. RODGERS  
Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

DATED: 10/23, 2013

PAUL L. GABBERT

  
Attorneys for Claimants  
LAMONT BENNETT, JILL JOHNSON  
BENNETT and LIGHT UP LIFE  
ENTERTAINMENT, INC.

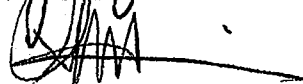
DATED: \_\_\_\_\_, 2013

  
LAMONT BENNETT

DATED: 10/23, 2013

  
JILL JOHNSON BENNETT

DATED: \_\_\_\_\_, 2013

  
LIGHT UP LIFE ENTERTAINMENT, INC.  
GREGORY HOOKIN  
CHIEF FINANCIAL OFFICER