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United States of America

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION
13

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.

17 \$61,098.00 IN MONEY ORDERS;
18 \$12,850 IN TRAVELERS CHECKS;
19 \$17,741.00 IN U.S. CURRENCY;
20 \$208,220.00 IN U.S. CURRENCY;
21 \$1,031,900.00 IN U.S. CURRENCY;
and \$404,600.01 IN BANK FUNDS,

22 Defendants.

23 BEHZAD ZAMAN, NEDA ZAMAN,
24 BEHROUZ ZAMAN, JINETTE M.
ZAMAN, SAMAN ZAMAN, NADIA
ZAMAN, and IRMA TORRES,

25 Claimants.

NO. CV 08-06066-DSF(CW_x)
(*Consolidated With*)
NO. CV 10-6727-DSF(CW_x)

[PROPOSED]

**CONSENT JUDGMENT AS TO
CLAIMANTS SAMAN ZAMAN
AND NADIA ZAMAN ONLY**

[This consent judgment is not case-
dispositive, but resolves the claims of
two claimants in their entirety]

26 The lead civil forfeiture action captioned above was commenced on
27 September 16, 2008. Claimants Saman Zaman and Nadia Zaman (“Claimants”)
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1 filed claims and answers on October 23, 2008 and November 11, 2008,
2 respectively. The time for filing claims and answer has expired. Claimants contest
3 the forfeiture of \$5,378.26 seized from First Bank account -2801, held in the name
4 of Black and White Rent-A-Car (the "Black and White Funds"). The parties
5 stipulate and agree that no other claimant has made a claim to the Black and White
6 Funds. The parties have agreed to settle the claims of Claimants and to avoid
7 further litigation between them by entering into this Consent Judgment.

8 The Court, having been duly advised of and having considered the matter,
9 and based upon the mutual consent of the parties hereto,

10 **ORDERS ADJUDGES AND DECREES:**

11 1. This Court has jurisdiction over the subject matter of this action and over
12 the parties to this Consent Judgment.

13 2. The Complaint for Forfeiture states a claim for relief pursuant to 18
14 U.S.C. § 981(a) with respect to the Black and White Funds.

15 3. Notice of this action has been given as required by law. No one other
16 than Claimants has made a claim for the Black and White Funds.

17 4. The sum of \$5,378.26, less any debts or other amounts owed by
18 Claimants which the United States of America is required to offset pursuant to 31
19 U.S.C. § 3716 (through the Treasury Offset Program) shall be returned to
20 Claimants through their counsel. For purposes of returning said funds, Claimants
21 shall provide their social security or taxpayer identification numbers to the
22 government upon request, as well as the wire transfer information needed to make
23 the payment electronically.

24 5. Claimants hereby release the United States of America, its agencies,
25 agents, officers, employees and representatives, including, without limitation, all
26 agents, officers and employees of the Department of Homeland Security and the
27 Department of Justice, as well as any and all agents, officers, employees and
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1 representatives of any state or local governmental or law enforcement agency
2 involved in the investigation or prosecution of this matter, from any and all claims,
3 actions, or liabilities arising out of or related to this action, including, without
4 limitation, any claim for attorney fees, costs and interest, which may be asserted by
5 or on behalf of Claimants.

6 6. The Court finds that there was reasonable cause for seizure of the Black
7 and White Funds and the institution of these proceedings against said funds. This
8 judgment shall be construed as a certificate of reasonable cause pursuant to 28
9 U.S.C. § 2465.

10 7. Pursuant to the agreement of the parties, each of the parties to this
11 Consent Judgment shall bear its own fees and costs associated with this action.

12
13 DATED: 9/26/11

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15
16 THE HONORABLE DALE S. FISCHER
UNITED STATES DISTRICT JUDGE

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18 [Signatures of counsel appear on following page]
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1 By their signatures hereunder, the government and Claimants stipulate and
2 request that the Court enter this Consent Judgment and waive any right to appeal.
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4 DATED: September 23, 2011

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Assistant United States Attorney
Chief, Criminal Division

7
8 /S/ Steven R. Welk
STEVEN R. WELK
Assistant United States Attorney
Chief, Asset Forfeiture Section

10 Attorneys for Plaintiff
United States of America

12 DATED: September 23, 2011

VENABLE LLP

14 /S/ David A. Kettel
DAVID A. KETTEL (by email
15 authorization on 092311)

16 Attorney for Claimants
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