

ANDRÉ BIROTTE JR.

United States Attorney

CHRISTINE C. EWELL

Assistant United States Attorney

Chief, Criminal Division

STEVEN R. WELK

Assistant United States Attorney

Chief, Asset Forfeiture Section

KATHARINE SCHONBACHLER

Assistant United States Attorney

Asset Forfeiture Section

California Bar No. 222875

Federal Courthouse, 14th Floor

312 North Spring Street

Los Angeles, California 90012

Telephone: (213) 894-3172

Facsimile: (213) 894-7177

E-mail: Katie.Schonbachler@usdoj.gov

JS-6

Attorneys for Plaintiff

United States of America

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ONE 2008 CHEVROLET CORVETTE

Z06; ONE 2007 CADILLAC

ESCALADE; ONE 2005 CHEVROLET

SILVERADO 1500 LS TRUCK;

\$4,000.00 IN U.S. CURRENCY; AND

\$7,011.56 IN BANK FUNDS

Defendants.

) NO. **2:10-cv-01943-JHN -FFMx**

) **CONSENT JUDGMENT AS TO**
) **POTENTIAL CLAIMANT ALEJANDRO**
) **RAIGOZA, JR. ONLY**

/ / /

/ / /

1 This action was filed on March 17, 2010. Notice was given
2 and published in accordance with law. Plaintiff and potential
3 claimant Alejandro Raigoza, Jr. ("Raigoza") have reached an
4 agreement that is dispositive of the action. No other statements
5 of interest or answers have been filed, and the time for filing
6 such statements of interest and answers has expired. The parties
7 hereby request that the Court enter this Consent Judgment of
8 Forfeiture.

9 **WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:**

10 1. This Court has jurisdiction over the parties and the
11 subject matter of this action.

12 2. Notice of this action has been given in accordance with
13 law. All potential claimants to the defendants One 2008
14 Chevrolet Corvette Z06 (VIN #1G1YY26E885109646), One 2007
15 Cadillac Escalade (VIN #1GYFK63857R296626), One 2005 Chevrolet
16 Silverado 1500 Ls Truck (VIN #1GCEK14T25Z229762), \$4,000.00 in
17 U.S. Currency, and \$7,011.56 in Bank Funds (hereinafter
18 "defendants") other than Raigoza are deemed to have admitted the
19 allegations of the Complaint. The allegations set out in the
20 Complaint are sufficient to establish a basis for forfeiture.
21 Raigoza is relieved of his obligation to file a verified claim of
22 interest or an answer in this litigation.

23 3. The United States of America shall have judgment as
24 Raigoza's interests in the defendants One 2007 Cadillac Escalade,
25 One 2008 Chevrolet Corvette Z06 and One 2005 Chevrolet Silverado
26 1500 Ls Truck. The United States Marshals' Service shall dispose
27 of these defendant vehicles in accordance with law.

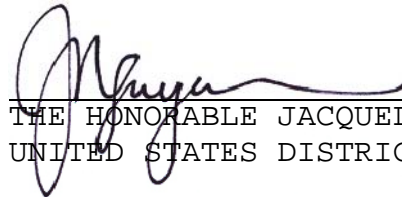
28 / / /

1 4. The defendants \$4,000.00 in U.S. Currency and \$7,011.56
2 in Bank Funds, without any interest earned by the government on
3 either amount, shall be paid to Raigoza and be returned in care
4 of his attorney, Eric Honig. Said funds in the total amount of
5 \$11,011.56 shall be forwarded to "Alejandro Raigoza, Jr." in care
6 of his attorney, Eric Honig, Esq., P.O. Box 10327, Marina Del
7 Rey, California 90295 within 60 days of the date the Court
8 executes this Consent Judgment.

9 5. Raigoza hereby releases the United States of America,
10 its agencies, agents, and officers, including employees and
11 agents of the Federal Bureau of Investigation, from any and all
12 claims, actions or liabilities arising out of or related to this
13 action, including, without limitation, any claim for attorney's
14 fees, costs or interest which may be asserted on behalf of the
15 claimant, whether pursuant to 28 U.S.C. § 2465 or otherwise.

16 6. The court finds that there was reasonable cause for the
17 seizure of the defendants and institution of these proceedings.
18 This judgment shall be construed as a certificate of reasonable
19 cause pursuant to 28 U.S.C. § 2465.

20 Dated: June 28, 2010



THE HONORABLE JACQUELINE H. NGUYEN
UNITED STATES DISTRICT JUDGE

21
22
23 **[Signatures of counsel appear on the next page.]**
24
25
26
27
28

1 Approved as to form and content:

2 DATED: June 25, 2010

3 ANDRÉ BIROTTE JR.
4 United States Attorney
5 CHRISTINE C. EWELL
6 Assistant United States Attorney
7 Chief, Criminal Division
8 STEVEN R. WELK
9 Assistant United States Attorney
10 Chief, Asset Forfeiture Section

11
12 /s/ Katharine Schonbachler
13 _____
14 KATHARINE SCHONBACHLER
15 Assistant United States Attorney
16 Attorneys for Plaintiff
17 United States of America

18 DATED: June 25, 2010

19 LAW OFFICE OF ERIC HONIG

20 /s/ Eric Honig
21 _____
22 ERIC HONIG, ESQ.
23 Attorney for ALEJANDRO RAIGOZA, JR.
24
25
26
27
28