

1 ANDRÉ BIROTTE JR.  
 United States Attorney  
 2 ROBERT E. DUGDALE  
 Assistant United States Attorney  
 3 Chief, Criminal Division  
 STEVEN R. WELK  
 4 Assistant United States Attorney  
 Chief, Asset Forfeiture Section  
 5 JENNIFER M. RESNIK  
 Assistant United States Attorney  
 6 Asset Forfeiture Section  
 (Cal. State Bar # 233634)  
 7 1400 United States Courthouse  
 312 North Spring Street  
 8 Los Angeles, California 90012  
 Telephone: (213) 894-6595  
 9 Facsimile: (213) 894-7177  
 E-mail: jennifer.resnik@usdoj.gov

10 Attorneys for Plaintiff  
 11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT  
 13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA, ) NO. CV 12-04474-GAF-JC  
 15 )  
 Plaintiff, )  
 16 )  
 v. )  
 17 )  
 REAL PROPERTY LOCATED IN ) CONSENT JUDGMENT  
 18 DIAMOND BAR, CALIFORNIA, )  
 ASSESSOR PARCEL NUMBER 8713- )  
 19 028-003, )  
 )  
 20 )  
 )  
 21 Defendant. )  
 )  
 22 )  
 )  
 23 SYED QAISAR MADAD AND MEHER )  
 FATINA TABATABAI, )  
 24 )  
 Claimants. )  
 25 )  
 26 )

27 RECITALS

- 28 1. This action was filed on May 23, 2012.  
 2. Notice was given and published in accordance with law.

1       3.       Claimants Syed Qaisar Madad and Meher Fatima Tabatabai  
2 ("Claimants") filed claims to the defendant Real Property Located  
3 in Diamond Bar, California with assessor parcel number 8713-028-  
4 003 (the "defendant property"). The legal description of the  
5 defendant property is attached as Exhibit "A." No other  
6 statements of interest or answers have been filed, and the time  
7 for filing such statements of interest and answers has expired.  
8 Plaintiff and Claimants have reached an agreement that is  
9 dispositive of the action. The parties hereby request that the  
10 Court enter this Consent Judgment of Forfeiture.

11               WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:

12               A.       This Court has jurisdiction over this action  
13 pursuant to 28 U.S.C. §§ 1345 and 1355 and over the parties  
14 hereto.

15               B.       The Complaint for Forfeiture states a claim for  
16 relief pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C).

17               C.       Notice of this action has been given in accordance  
18 with law. All potential claimants to the defendant property  
19 other than Claimants are deemed to have admitted the allegations  
20 of the Complaint. The allegations set out in the Complaint are  
21 sufficient to establish a basis for forfeiture.

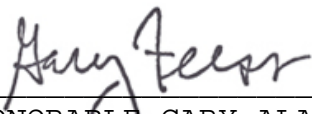
22               D.       The United States of America shall have judgment  
23 as to all of the defendant property, subject to the recorded  
24 interest of J. Lee Gregg (Instrument Number 20120571405), and no  
25 other person or entity shall have any right, title or interest  
26 therein.

27               E.       Claimant hereby releases the United States of  
28 America, its agencies, agents, and officers, including employees

1 and agents of the United States Federal Bureau of Investigation  
2 and Internal Revenue Service, from any and all claims, actions or  
3 liabilities arising out of or related to this action, including,  
4 without limitation, any claim for attorney's fees, costs or  
5 interest which may be asserted on behalf of the claimant, whether  
6 pursuant to 28 U.S.C. § 2465 or otherwise.

7 F. The court finds that there was reasonable cause  
8 for the institution of these proceedings. This judgment shall be  
9 construed as a certificate of reasonable cause pursuant to 28  
10 U.S.C. § 2465.

11  
12 Dated: February 26, 2013

13   
14 \_\_\_\_\_  
15 THE HONORABLE GARY ALAN FEESS  
16 UNITED STATES DISTRICT JUDGE

17 Approved as to form and content:

18 Dated: February\_25, 2013

19 ANDRÉ BIROTTE JR.  
20 United States Attorney  
21 ROBERT E. DUGDALE  
22 Assistant United States Attorney  
23 Chief, Criminal Division  
24 STEVEN R. WELK  
25 Assistant United States Attorney  
26 Chief, Asset Forfeiture Section

27 \_\_\_\_\_ /s/  
28 JENNIFER M. RESNIK  
29 Assistant United States Attorney  
30 Asset Forfeiture Section

31 Attorneys for Plaintiff  
32 United States of America

33 DATED: February\_22, 2013

34 \_\_\_\_\_ /s/  
35 MEHER F. TABATABAI

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: February 25, 2013

\_\_\_\_\_/s/  
ROBERT J. FELDHAKE, ESQ.  
Attorney for Claimant Meher  
Tabatabai

DATED: February\_22, 2013

\_\_\_\_\_/s/  
SYED QAISAR MADAD

DATED: February 25, 2013

\_\_\_\_\_/s/  
LAW OFFICES OF MARK J. WERKSMAN  
MARK M. HATHAWAY  
Attorney for Claimant Syed Qaisar  
Madad

**EXHIBIT A**

PARCEL 1: LOT 118 OF TRACT NO. 30578, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 785, PAGES 1 TO 25, INCLUSIVE, OF MAPS IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

RESERVING UNTO THE GRANTOR EASEMENTS AS RESERVED IN SECTIONS 1 AND 2 OF ARTICLE VI OF THE DECLARATION OF RESTRICTIONS RECORDED MAY 22, 1969 IN BOOK M-3218, PAGE 32, OFFICIAL RECORDS, TOGETHER WITH THE RIGHT TO GRANT OR DEDICATE TO OTHERS WITHOUT LIMITATION LIKE OR SIMILAR EASEMENT.

EXCEPTING THEREFROM ALL OIL, GAS AND OTHER HYDROCARBON SUBSTANCES AND MINERAL NOW OR AT ANY TIME HEREAFTER SITUATED THEREIN OR THEREUNDER OR PRODUCIBLE THEREFROM, AS RESERVED IN THE DEED FROM TRANSAMERICA DEVELOPMENT COMPANY, RECORDED MARCH 29, 1968, IN BOOK D-3955, PAGE 185, OFFICIAL RECORDS OF SAID COUNTY AND AS MODIFIED BY QUITCLAIM DEED RECORDED ON MAY 8, 1969 IN BOOK D-4363, PAGE 643, OFFICIAL RECORDS OF SAID COUNTY, WHICH, RELINQUISHED ALL RIGHTS TO THE USE OF THE SURFACE AND SUBSURFACE TO A DEPTH OF 500 FEET FROM THE SURFACE OF SAID LAND.

PARCEL 2: A NON-EXCLUSIVE EASEMENT TO BE USED IN COMMON WITH OTHERS FOR INGRESS AND EGRESS OVER ALL THOSE AREAS SHOWN UPON THE MAP OF SAID TRACT NO. 30578, AS "PRIVATE STREETS", AND OVER ALL THOSE AREAS SHOWN UPON THE MAP OF TRACT NO. 30289 RECORDED IN BOOK 743, PAGES 42 TO 50, INCLUSIVE, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY AS "PRIVATE STREETS", SAID EASEMENT TO BE APPURTENANT TO AND FOR THE BENEFIT OF THE LOT DESCRIBED ABOVE IN PARCEL 1.

EXCEPTING THEREFROM ANY PORTION WHICH FALLS WITHIN THE LINES PARCEL 1 ABOVE DESCRIBED.

APN 8713-028-003