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                                                  E-FILED 4/22/14
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                       UNITED STATES DISTRICT COURT
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                  FOR THE CENTRAL DISTRICT OF CALIFORNIA
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                              WESTERN DIVISION
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    UNITED STATES OF AMERICA, ) No. CV 13-7226-PSG(MRWx)
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               Plaintiff,
                                  [PROPOSED]
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                                  CONSENT JUDGMENT OF FORFEITURE
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    $200,000.00 IN U.S.
    CURRENCY,
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               Defendant.
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    ALEXANDRO GONZALEZ,
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                Claimant.
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         On or about September 30, 2013, Plaintiff United States of
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    America ("the government," "the United States of America" or
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    "plaintiff") filed a Complaint for Forfeiture alleging that the
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defendant \$200,000.00 in U.S. Currency (the "defendant currency") is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).

Claimant Alexandro Gonzalez ("claimant") filed on or about November 1, 2013 a claim to the defendant currency and an answer to the Complaint. No other parties have appeared in this case and the time for filing claims and answers has expired.

The government and claimant have now agreed to settle this action and to avoid further litigation by entering into this Consent Judgment of Forfeiture.

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

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

- 1. This Court has jurisdiction over the subject matter of this action and the parties to this Consent Judgment of Forfeiture.
- 2. The Complaint for Forfeiture states a claim for relief pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).
- 3. Notice of this action has been given as required by law. No appearances have been made in the litigation by any person other than claimant. The Court deems that all other potential claimants admit the allegations of the Complaint for Forfeiture to be true.
- 4. The sum of \$5,000.00 only (without interest), less any debts or other amounts owed by claimant or claimant's attorney of record in this case which the United States of America is

entitled to offset pursuant to 31 U.S.C. § 3716 or otherwise, shall be returned to claimant. The remainder of the defendant currency (i.e., \$195,000.00), plus the interest earned by the United States of America on the defendant currency shall be condemned and forfeited to the United States of America, which shall dispose of those funds in accordance with law.

5. The funds to be returned to claimant pursuant to paragraph 4 above shall be paid to claimant by electronic transfer directly into the client trust account of the Law Offices of Thomas P. Sleisenger, attorneys of record for claimant in this case. Claimant (through his attorney of record Thomas P. Sleisenger, Esq.) shall provide all information and complete all documents requested by the United States of America in order for the United States of America to complete the transfer and determine the government's right to any offset pursuant to 31 U.S.C. § 3716 or otherwise including, without limitation, providing claimant's social security and taxpayer identification numbers (if any), claimant's attorney of record's taxpayer identification number, and the identity of the bank, the bank's address and the account name, account number, account type and wire transfer routing number for the Law Offices of

 $^{^131}$ U.S.C. § 3716, the Debt Collection Improvement Act of 1996, requires the United States of America to offset from its payments delinquent debts owed to States, including past-due child support enforced by States. For purposes of determining an offset pursuant to 31 U.S.C. § 3716 or otherwise, one third of the \$5,000.00 returned amount (i.e., \$1,666.67) shall be deemed to constitute attorney fees belonging to claimant's attorney of record in this case (i.e., the Law Offices of Thomas P. Sleisenger), while the remaining two-thirds of the \$5,000.00 returned amount (i.e., \$3,333.33) shall be deemed to belong to claimant.

Thomas P. Sleisenger client trust account to which the transfer of funds is to be made.

- 6. Claimant hereby releases the United States of America, its agencies, agents, officers, employees and representatives, including, without limitation, all agents, officers, employees and representatives of the Drug Enforcement Administration or the Department of Justice and their respective agencies, as well as all agents, officers, employees and representatives of any state or local governmental or law enforcement agency involved in the investigation or prosecution of this matter, from any and all claims, actions or liabilities arising out of or related to this action, including, without limitation, any claim for attorney fees, costs and interest, which may be asserted by or on behalf of claimant, whether pursuant to 28 U.S.C. § 2465 or otherwise.
- 7. The Court finds that there was reasonable cause for the seizure of the defendant currency and institution of these proceedings. This judgment shall be construed as a certificate of reasonable cause pursuant to 28 U.S.C. § 2465.
- 8. The Court further funds that claimant did not substantially prevail in this action, and the parties hereto shall bear their own attorney fees and costs.

PHILIP S. GUTIERREZ

THE HONORABLE PHILIP S. GUTIERREZ UNITED STATES DISTRICT JUDGE

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CONSENT

1	CONSENT
2	The parties hereto consent to the above judgment and waive
3	any right of appeal.
4	DATED: April 19. 2014 ANDRÉ BIROTTE JR.
5	United States Attorney ROBERT E. DUGDALE
6	Assistant United States Attorney Chief, Criminal Division
7	STEVEN R. WELK Assistant United States Attorney
8	Chief, Asset Forfeiture Section
9	Nyt It.
10	VICTOR A. RODGERS
11	Attorneys for Plaintiff UNITED STATES OF AMERICA
13	DATED: April /8, 2014 LAW OFFICES OF THOMAS P. SLEISENGER
14	DATED: April 12, 2014 LAW OFFICES OF THOMAS P. SLEISENGER
15	At Cheluses
16	THOMAS P. SKEISENGER
17	Attorneys for Claimant ALEXANDRO GONZALEZ
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