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

18 UNITED STATES OF AMERICA,)	NO. CV 14-4313 CAS (FFMx)
)	
19 Plaintiff,)	
)	{PROPOSED} CONSENT JUDGMENT OF
20 vs.)	FORFEITURE
)	
21 \$71,019.71 SEIZED FROM J.P.)	
)	
22 MORGAN CHASE BANK ACCOUNT)	
)	
23 NUMBER XXXXXX6089, ET AL.)	
)	
24 Defendants.)	

25
 26 Plaintiff and Claimants Jose Figueroa and Lucero Adriana
 27 Lara ("Claimants") have made a stipulated request for the entry
 28

1 of this Consent Judgment, resolving this action in its entirety.
2 The defendant assets were seized from Claimants, and they assert
3 an interest in the defendant assets and have filed claims in
4 this case and have answered the complaint. No other claims or
5 answers were filed, and the time for filing claims and answers
6 has expired.

7 The Court, having considered the stipulation of the
8 parties, and good cause appearing therefor, **HEREBY ORDERS**

9 **ADJUDGES AND DECREES:**

10 1. The government has given and published notice of this
11 action as required by law, including Rule G of the Supplemental
12 Rules for Admiralty or Maritime Claims and Asset Forfeiture
13 Actions, Federal Rules of Civil Procedure, and the Local Rules
14 of this Court. Claimants have filed claims and answers to
15 contest the forfeiture of the defendant assets. No other claims
16 were filed, and the time for filing claims and answers has
17 expired. This Court has jurisdiction over the parties to this
18 judgment and the defendant assets. Any potential claimants to
19 the defendant assets other than Claimants are deemed to have
20 admitted the allegations of the complaint with respect to the
21 defendant assets.

22 2. The following defendant assets shall be returned to
23 Claimants as follows:

- 24 a. \$55,474.71, without interest; and
- 25 b. The defendant One 2014 Chevrolet Silverado,
26 Vehicle Identification Number 3GCPCSEC7EG263254.

27 The United States shall return the above-listed assets in
28 Paragraph 2 not later than 45 days after (a) the court enters

1 this Consent Judgment and (b) Claimants provide to the
2 government the bank routing and personal identifiers needed to
3 effect a wire transfer of any returned funds, whichever is
4 later. If the United States elects to make the payment by
5 check, the check will be payable to "Paul L. Gabbert Client
6 Trust Account," and mailed to Jose Figueroa and Lucero Adriana
7 Lara, in care of their attorney, Paul L. Gabbert, Esq. 2115 Main
8 Street, Santa Monica, CA 90405. If the United States elects to
9 make the payment by wire transfer, the funds will be wire
10 transferred to a "Paul L. Gabbert Client Trust Account."

11 3. The following assets shall be forfeited to the United
12 States, and no other right, title or interest shall exist
13 therein. The Government shall dispose of the following
14 according to law:

15 a. \$55,258.46, with interest;

16 b. The defendant One 2006 BMW 650i, Vehicle
17 identification Number WBAEK13426CN80165; and

18 c. The defendant 2003 Tracker boat and trailer,
19 Vehicle Identification Number BUJ35979E303.

20 4. Claimants have agreed to release the United States of
21 America, its agencies, agents, and officers, including employees
22 and agents of the Federal Bureau of Investigation, as well as
23 all agents, officers, employees and representatives of any state
24 or local government or law enforcement agency involved in the
25 investigation or prosecution of this matter, from any and all
26 claims, actions or liabilities arising out of or related to the
27 seizure and retention of the defendant assets and/or the
28 commencement of this civil forfeiture action, including, without

1 limitation, any claim for attorneys' fees, costs or interest
2 which may be asserted on behalf of Claimants against the United
3 States, whether pursuant to 28 U.S.C. § 2465 or otherwise.
4 Claimants have waived any rights they may have to seek remission
5 or mitigation of the forfeiture.

6 5. The court finds that there was reasonable cause for the
7 seizure of the defendant assets and the institution of this
8 action as to the defendant assets. This judgment constitutes a
9 certificate of reasonable cause pursuant to 28 U.S.C. § 2465 as
10 to the defendant assets.

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