

JS-6

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

17 UNITED STATES OF AMERICA,)	NO. CV 14-07734 PA (PJWx)
)	
18 Plaintiff,)	
)	
19 vs.)	
)	CONSENT JUDGMENT OF FORFEITURE
20)	
21 \$77,400.00 IN U.S. CURRENCY,)	
)	
22 Defendant.)	
23)	

24
 25 This action was filed on October 6, 2014 against the
 26 defendant \$77,400.00 in U.S. Currency ("defendant currency").
 27 Jose Leyva Miranda ("Miranda") and Ramona Jacqueline Gonzalez-
 28 Flores ("Gonzalez-Flores") claim an interest in the defendant

1 \$77,400.00 in U.S. Currency, but have not filed a claim or
2 answer. The parties are not aware of any other potential
3 claimants to the defendant currency. No other parties have
4 appeared in this case and the time for filing statements of
5 interest and answers has expired. Plaintiff United States of
6 America, Miranda, and Gonzalez-Flores have reached an agreement
7 that is dispositive of the action. The parties hereby request
8 that the Court enter this Consent Judgment of 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 defendant \$77,400.00 in U.S.
14 Currency, other than Miranda and Gonzalez-Flores, are deemed to
15 have admitted the allegations of the Complaint. The allegations
16 set out in the Complaint are sufficient to establish a basis for
17 forfeiture. Miranda and Gonzalez-Flores are relieved of their
18 obligation to file a claim or an answer in this litigation.

19 3. The United States of America shall have judgment as to
20 \$67,400.00 of the defendant currency and all interest earned of
21 the entirety of the defendant currency since seizure, and no
22 other person or entity shall have any right, title or interest
23 therein. The United States Marshals Service is ordered to
24 dispose of said funds in accordance with law.

25 4. \$10,000.00 of the defendant currency, without interest,
26 shall be returned to Miranda and Gonzalez-Flores by either check
27 or wire transfer. If the United States elects to make the
28 payment by check, the check will be payable to "Jose Leyva

1 Miranda and Ramona Jacqueline Gonzalez-Flores," and mailed to
2 attorney Elizabeth Carpenter, Esq. at the Law Office of Elizabeth
3 Carpenter, 2923 Waverly Drive, Los Angeles, California 90039.

4 If the United States elects to make the payment by wire transfer,
5 the funds will be wire transferred to the bank account that
6 Miranda, Gonzalez-Flores and their attorney specify. Miranda,
7 Gonzalez-Flores and their attorney shall provide any and all
8 information needed to process the return of these funds according
9 to federal law.

10 5. Miranda and Gonzalez-Flores have agreed to release the
11 United States of America, its agencies, agents, and officers,
12 including employees, officers and agents of the Drug Enforcement
13 Administration, from any and all claims, actions or liabilities
14 arising out of or related to this action, including, without
15 limitation, any claim for attorney's fees, costs or interest
16 which may be asserted on behalf of Miranda and Gonzalez-Flores,
17 whether pursuant to 28 U.S.C. § 2465 or otherwise.

18 6. The court finds that there was reasonable cause for the
19 seizure of the defendant \$77,400.00 in U.S. Currency and
20 institution of these proceedings. This judgment shall be
21 construed as a certificate of reasonable cause pursuant to 28
22 U.S.C. § 2465.

23
24 Dated: January 29, 2015



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THE HONORABLE PERCY ANDERSON
UNITED STATES DISTRICT JUDGE

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[Signatures of parties appear on the next page.]

1 Approved as to form and content:

2
3 DATED: January 26, 2015

STEPHANIE YONEKURA
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Chief, Criminal Division
STEVEN R. WELK
Assistant United States Attorney
Chief, Asset Forfeiture Section

7
8 /s/ Katharine Schonbachler
KATHARINE SCHONBACHLER
9 Assistant United States Attorney

10 Attorneys for Plaintiff
11 United States of America

12 DATED: January 21, 2015

LAW OFFICE OF ELIZABETH CARPENTER

14 /s/ C. Elizabeth Carpenter
15 C. ELIZABETH CARPENTER, ESQ.
16 Attorney for Potential Claimants
17 Jose Leyva Miranda and
18 Ramona Jacqueline Gonzalez-Flores

19 DATED: December ____, 2014

/s/ Jose Leyva Miranda
20 JOSE LEYVA MIRANDA
21 Potential Claimant

22
23 DATED: December ____, 2014

/s/ Ramona J. Gonzalez-Flores
24 RAMONA JACQUELINE GONZALEZ-FLORES
25 Potential Claimant
26
27
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