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JS-6 1 EILEEN M. DECKER United States Attorney 2 LAWRENCE S. MIDDLETON **Assistant United States Attorney** FILED CLERK, U.S. DISTRICT COURT 3 Chief, Criminal Division STEVEN R. WELK 4 Assistant United States Attorney September 11, 2016 Chief, Asset Forfeiture Section CENTRAL DISTRICT OF CALIFORNIA 5 CHRÍSTEN A. SPROULE (Cal. Bar #310120) Assistant United States Attorney 6 Asset Forfeiture Section 1400 United States Courthouse 7 312 North Spring Street Los Angeles, California 90012 Telephone: (213) 894-4493 Facsimile: (213) 894-7177 8 9 Christen.A.Sproule@usdoj.gov E-mail: 10 Attorneys for Plaintiff UNITED STATES OF AMERICA 11 UNITED STATES DISTRICT COURT 12 FOR THE CENTRAL DISTRICT OF CALIFORNIA 13 WESTERN DIVISION 14 UNITED STATES OF AMERICA, No. CV 14-09899-SJO (ASx) 15 Plaintiff, CONSENT JUDGMENT 16 v. 17 \$25,285.00 in U.S. CURRENCY 18 19 Defendant. FRANCES KAY WILLIAMS, 20 Claimant. 21 22 23 This action was filed on January 22, 2015 against the defendant \$22,285.00 in 24 U.S. Currency ("defendant currency"). Frances Kay Williams ("Williams") filed a claim 25 and answer on April 10, 2015. No person other than Williams is believed to have an 26 interest therein. Notice has been given and published in accordance with law. No other

claims or answers have been filed, and the time for filing claims and answers has

expired. Plaintiff United States of America and Williams have reached an agreement

that is dispositive of the action and have requested that this consent judgment be entered. Nothing in this consent judgment is intended or should be interpreted as an admission of wrongdoing by Williams.

WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:

- A. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355 and over the parties hereto.
- B. 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).
- C. Notice of this action has been given in accordance with law. All potential claimants to the defendant currency other than Williams are deemed to have admitted the allegations of the Complaint. The allegations set out in the Complaint are sufficient to establish a basis for forfeiture.
 - D. The defendant currency shall be returned to Williams without interest.
- E. The funds to be returned to Williams shall, at the government's option, be returned by either check or wire transfer within 60 days of the date this Judgment is entered or the date Williams provides the information described below, whichever is later. If the United States elects to make the payment by check, the check will be payable to "Paul L. Gabbert, Client Trust Account." If the United States elects to make the payment by wire transfer, the funds will be wire transferred to Paul L. Gabbert, Client Trust Account. Williams agrees to provide the necessary bank account information and personal identifiers for Mr. Gabbert's trust account upon request from the United States.
 - F. Williams agrees to waive any and all attorney fees and costs.
- G. Williams has released the United States of America, its agencies, agents, officers, employees and representatives, including, without limitation, all agents, officers, employees and representatives of the Federal Bureau of Investigation and 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	
2	agency involved in the investigation or prosecution of this matter, from any and all	
3	claims (including, without limitation, any petitions for remission, which Williams hereby	
4	withdraws), actions or liabilities arising out of or related to this action, including,	
5	without limitation, any claim for attorney fees, costs and interest, which may be asserted	
6	by or on behalf of Williams, whether pursuant to 28 U.S.C. § 2465 or otherwise.	
7	H. The Court finds that there was reasonable cause for the institution of these	
8	proceedings. This Judgment shall be	construed as a certificate of reasonable cause
9	pursuant to 28 U.S.C. § 2465.	
10	9/11/16	5. Jame Otens
11	Dated:	THE HONORABLE S. JAMES OTERO
12		UNITED STATES DISTRICT JUDGE
13	Approved as to form and content:	
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15	DATED: August , 2016	EILEEN M. DECKER United States Attorney LAWRENCE S. MIDDLETON
16		Assistant United States Attorney
17		Chief, Criminal Division STEVEN R. WELK Assistant United States Attorney
18		Assistant United States Attorney Chief, Asset Forfeiture Section
19		CHDICTENIA CDDOLLE
20		CHRISTEN A. SPROULE Assistant United States Attorney
21		Attorneys for Plaintiff United States of America
22		Officed States of Afficinea
23	DATED: August , 2016	
24		FRANCES KAY WILLIAMS Claimant
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