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 11 Attorneys for Plaintiff
 UNITED STATES OF AMERICA

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

16
 17 UNITED STATES OF AMERICA
 18 Plaintiff,
 19 v.
 20 TWO MOTOR VEHICLES, ONE
 MOTORCYCLE, 219 VARIOUS UNOPENED
 21 BOTTLES OF ALCOHOL, AND
 \$162,019.86 IN BANK FUNDS,
 22 Defendants.

CV No. 15-5221-CAS (RAO)

{PROPOSED}

PARTIAL CONSENT JUDGMENT OF
 FORFEITURE

23 VAROUGH GHARIBI AND NANUSH
 24 AGADZHAYAN
 25 Claimants.

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1 This action was filed on July 10, 2015, against the
2 following assets (collectively the "defendant property"): (i)
3 one 2010 Jeep Wrangler bearing Vehicle Identification Number
4 (VIN) 1J4BA3H16ALL113210 (the "defendant Jeep Wrangler"); (ii)
5 one 2011 Dodge Ram truck bearing VIN 1D7RV1CT6BS505767 (the
6 "defendant Dodge Ram"); (iii) one 2009 CanAm Spyder motorcycle
7 bearing VIN 2BXJACA199V000311 (the "defendant Spyder"); (iv) 219
8 various unopened bottles of alcohol seized on November 18, 2014
9 (the "defendant alcohol"); and (v) \$162,019.86 in bank funds
10 seized on or about April 1, 2015, from a Wells Fargo Bank
11 account with account number ending in 0792 (the "defendant bank
12 funds"). Notice was given and published in accordance with law.
13 Claimant Varough Gharibi ("Gharibi") filed the only claim to the
14 defendant Jeep Wrangler, the defendant alcohol and the defendant
15 bank funds. Claimant Nanush Agadzhasyan ("Agadzhasyan") filed the
16 only claim to the defendant Dodge Ram. No other statements of
17 interest or answers have been filed, and the time for filing
18 such statements of interest and answers has expired. Plaintiff
19 and Claimants have reached an agreement that is partially
20 dispositive of the action. The parties have requested that the
21 Court enter this Consent Judgment of Forfeiture.

22 WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:

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

25 B. The Complaint for Forfeiture states a claim for relief
26 pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 984.

27 C. Notice of this action has been given in accordance
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1 with law. All potential claimants to the defendant property
2 other than Claimants are deemed to have admitted the allegations
3 of the Complaint. The allegations set out in the Complaint are
4 sufficient to establish a basis for forfeiture.

5 D. The United States of America shall have judgment as to
6 the defendant bank funds, together with all interest earned by
7 the government on the defendant bank funds since seizure, and
8 the defendant Jeep Wrangler, and no other person or entity shall
9 have any right, title or interest therein.

10 E. The defendant Dodge Ram shall be returned to Claimant
11 Agadzhayan or her designee in the Central District of California
12 by the United States Secret Service. The defendant alcohol shall
13 be returned to Claimant Gharibi or his designee in the Central
14 District of California by the United States Secret Service.

15 F. Claimants have released the United States of America,
16 its agencies, agents, and officers, including employees and
17 agents of the United States Secret Service, from any and all
18 claims, actions or liabilities arising out of or related to this
19 action, including, without limitation, any claim for attorney's
20 fees, costs or interest which may be asserted on behalf of
21 Claimants Agadzhayan and/or Gharibi, whether pursuant to 28
22 U.S.C. § 2465 or otherwise. Nothing in this consent judgment is
23 intended as, nor should anything in this consent judgment be
24 interpreted as an admission by Claimants of any liability or
25 wrongdoing.
26

27 G. The court finds that there was reasonable cause for
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1 the seizure of the defendant property and institution of these
2 proceedings. This judgment shall be construed as a certificate
3 of reasonable cause pursuant to 28 U.S.C. § 2465.

Christina A. Snyder

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5 Dated: October 28, 2015_

THE HONORABLE CHRISTINA A. SNYDER
UNITED STATES DISTRICT JUDGE

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7 **Approved as to form and content:**

8 DATED: October 27, 2015

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/S/

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Attorneys for Plaintiff
UNITED STATES OF AMERICA

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18 DATED: October 23, 2015

/S/

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Attorney for Claimants
Varough Gharibi and Nanush
Agadzhayan