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JS-6

10 Attorneys for Plaintiff
 11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

No. CV 15-6794 RGK(AJWx)

15 Plaintiff,

CONSENT JUDGMENT OF FORFEITURE

16 v.

17 REAL PROPERTY LOCATED IN
 BRENTWOOD, CALIFORNIA
 18 (TWINHAM), ET AL.,

19 Defendants.

20 BRADLEY TWYNHAM AND MARIEL
 TWYNHAM,

21 Claimants

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 24 Plaintiff and Claimants Bradley Martin Lewis Twynham and Mariel
 25 Twynham ("Claimants") have made a stipulated request for the entry of
 26 this Consent Judgment, resolving this action in its entirety. The
 27 defendant assets were seized from Claimants, and they assert an
 28 interest in the defendant assets and have filed claims in this case

1 and have answered the complaint. No other claims or answers were
2 filed, and the time for filing claims and answers has expired.

3 The Court, having considered the stipulation of the parties, and
4 good cause appearing therefor, **HEREBY ORDERS ADJUDGES AND DECREES:**

5 1. The government has given and published notice of this
6 action as required by law, including Rule G of the Supplemental Rules
7 for Admiralty or Maritime Claims and Asset Forfeiture Actions,
8 Federal Rules of Civil Procedure, and the Local Rules of this Court.
9 Claimants have filed claims and answers to contest the forfeiture of
10 the defendant assets. No other claims were filed, and the time for
11 filing claims and answers has expired. This Court has jurisdiction
12 over the parties to this judgment and the defendant assets. Any
13 potential claimants to the defendant assets other than Claimants are
14 deemed to have admitted the allegations of the complaint with respect
15 to the defendant assets. Nothing in this consent judgment is intended
16 or should be interpreted as an admission of wrongdoing by Claimants
17 Bradley Martin Lewis Twynham or Mariel Twynham, nor can this consent
18 judgment be admissible in any criminal proceeding against the
19 Claimants to prove any of the facts relied upon to establish
reasonable cause for the seizure of the defendant assets.

20 2. The following shall be returned to Claimant Mariel Twynham
21 as follows:

22 a. \$413,158.37.

23 The United States shall return the above-listed asset in
24 Paragraph 2 not later than 45 days after (a) the court enters this
25 Consent Judgment and (b) Claimants provide to the government the bank
26 routing and personal identifiers needed to effect a wire transfer of
27 any returned funds, whichever is later. If the United States elects
28 to make the payment by check, the check will be payable to "Nyman

1 Gibson Miralis Trust Account," and mailed to Mariel Twynham, in care
2 of her attorney, Dennis Miralis, Nyman Gibson Miralis, Level 9, 299
3 Elizabeth Street, Sydney, NSW2000 Australia, P.O. Box 21147 World
4 Square NSW2002 Australia. If the United States elects to make the
5 payment by wire transfer, the funds will be wire transferred to an
6 "Nyman Gibson Miralis Client Trust Account."

7 3. The following shall be forfeited to the United States, and
8 no other right, title or interest shall exist therein. The
9 Government shall dispose of the following according to law:

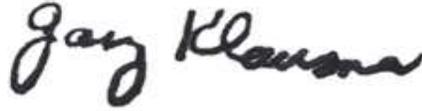
10 a. \$413,158.37.

11 4. Claimants have agreed to release the United States of
12 America, its agencies, agents, and officers, including employees and
13 agents of the Federal Bureau of Investigation, as well as all agents,
14 officers, employees and representatives of any state or local
15 government or law enforcement agency involved in the investigation or
16 prosecution of this matter, from any and all claims, actions or
17 liabilities arising out of or related to the seizure and retention of
18 the defendant assets and/or the commencement of this civil forfeiture
19 action, including, without limitation, any claim for attorneys' fees,
20 costs or interest which may be asserted on behalf of Claimants
21 against the United States, whether pursuant to 28 U.S.C. § 2465 or
22 otherwise. Claimants have waived any rights they may have to seek
23 remission or mitigation of the forfeiture.

24 5. The court finds that there was reasonable cause for the
25 seizure of the defendant assets and the institution of this action as
26 to the defendant assets. This judgment constitutes a certificate of
27 reasonable cause pursuant to 28 U.S.C. § 2465 as to the defendant
28 assets.

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1 6. Each of the parties shall bear its own fees and costs in
2 connection with the seizure, retention and return of the defendant
3 assets.

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5 DATED: January 3, 2017

6 THE HONORABLE R. GARY KLAUSNER
7 UNITED STATES DISTRICT JUDGE

8 Prepared by:

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11 LAWRENCE S. MIDDLETON
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13 Chief, Criminal Division
14 STEVEN R. WELK
15 Assistant United States Attorney
16 Chief, Asset Forfeiture Section

17 /s/ Jonathan Galatzan
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19 Assistant United States Attorney
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