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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 WESTERN DIVISION

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 \$85,271.64 IN BANK FUNDS SEIZED  
19 FROM TWO BANK OF AMERICA  
ACCOUNTS,

20 Defendant,

21 CHAO CHEN

22 Claimant.  
23

No. CV015-08271-PSG(DFMx)

~~PROPOSED~~

CONSENT JUDGMENT

24  
25 This action was filed on October 22, 2015 against the defendant \$85,271.64 in  
26 Bank Funds Seized from Two Bank of America Accounts, (“defendant funds”). Chao  
27 Chen (“Chen”), from whom the defendant funds were seized, filed a claim and answer  
28 on December 29, 2015. No person other than Chen is believed to have an interest

1 therein. Notice has been given and published in accordance with the law. No other  
2 claims or answers have been filed, and the time for filing claims and answers has  
3 expired. Plaintiff United States of America and Chen have reached an agreement that is  
4 dispositive of the action, and have requested that this consent judgment be entered.  
5 Nothing in this consent judgment is intended or should be interpreted as an admission of  
6 wrongdoing by Chen.

7 WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:

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

10 B. The Complaint for Forfeiture states a claim for relief pursuant to 18 U.S.C.  
11 § 981(a)(1)(A) and (C).

12 C. Notice of this action has been given in accordance with law. All potential  
13 claimants to the defendant funds other than Chen are deemed to have admitted the  
14 allegations of the Complaint. The allegations set out in the complaint are sufficient to  
15 establish a basis for forfeiture.

16 D. The defendant \$85,271.64 in bank funds, plus all interest earned on the  
17 entirety of the defendant funds since seizure, shall be and hereby is forfeited to the  
18 United States of America, which shall dispose of the defendant \$85,271.64 in bank funds  
19 and interest in the manner required by law.

20 E. Chen has released the United States of America, its agencies, agents, and  
21 officers, including employees and agents of United States Homeland Security ("DHS"),  
22 Homeland Security Investigations ("HSI"), United States Customs and Border Protection  
23 ("CBP"), and the Internal Revenue Service ("IRS"), from any and all claims, actions or  
24 liabilities arising out of or related to this action, including, without limitation, any claim  
25 for attorney's fees, costs or interest which may be asserted on his behalf, whether  
26 pursuant to 28 U.S.C. § 2465 or otherwise. Chen waives any rights he may have to seek  
27 remission of the forfeiture ordered herein.

1 F. The Court finds that there was reasonable cause for the institution of these  
2 proceedings. This Judgment shall be construed as a certificate of reasonable cause  
3 pursuant to 28 U.S.C. § 2465.  
4

5 Dated: 06/27/2016

PHILIP S. GUTIERREZ  
THE HONORABLE PHILLIP S. GUITERREZ  
UNITED STATES DISTRICT JUDGE

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

9 DATED: June 27, 2016

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16 Attorneys for Plaintiff  
United States of America

18 DATED: June 16, 2016

Chao Chen 06/16/2016.  
CHAO CHEN  
Claimant  
PRO SE

