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	Attorneys for Plaintiff UNITED STATES OF AMERICA		
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12	UNITED STATES DISTRICT COURT		
13	FOR THE CENTRAL DISTRICT OF CALIFORNIA		
14	WESTERN DIVISION		
15	UNITED STATES OF AMERICA,	No. CV015-08271-PSG(DFMx)	
16	Plaintiff,	XPROPOSED.	
17	V-	CONSENT JUDGMENT	
	000 001 CA DI DANE TED TO 0		
18	\$85,271.64 IN BANK FUNDS SEIZED FROM TWO BANK OF AMERICA		
19	ACCOUNTS,		
	N de	* #5//52	
20	Defendant,		
21			
	CHAO CHEN		
22			
23	Claimant.		
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"). Char		

Chen ("Chen"), from whom the defendant funds were seized, filed a claim and answer

on December 29, 2015. No person other than Chen is believed to have an interest

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therein. Notice has been given and published in accordance with the 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 Chen 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 Chen.

## 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)(A) and (C).
- C. Notice of this action has been given in accordance with law. All potential claimants to the defendant funds other than Chen 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 \$85,271.64 in bank funds, plus all interest earned on the entirety of the defendant funds since seizure, shall be and hereby is forfeited to the United States of America, which shall dispose of the defendant \$85,271.64 in bank funds and interest in the manner required by law.
- E. Chen has released the United States of America, its agencies, agents, and officers, including employees and agents of United States Homeland Security ("DHS"), Homeland Security Investigations ("HSI"), United States Customs and Border Protection ("CBP"), and the Internal Revenue Service ("IRS"), from any and all claims, actions or liabilities arising out of or related to this action, including, without limitation, any claim for attorney's fees, costs or interest which may be asserted on his behalf, whether pursuant to 28 U.S.C. § 2465 or otherwise. Chen waives any rights he may have to seek remission of the forfeiture ordered herein.

1	F. The Court finds that there was reasonable cause for the institution of these	
2		construed as a certificate of reasonable cause
3	pursuant to 28 U.S.C. § 2465.	
4	_	
5	Dated:06/27/2016	PHILIP S. GUTIERREZ
6		THE HONORABLE PHILLIP S. GUITERREZ UNITED STATES DISTRICT JUDGE
7	Approved on to forms and and and	CIVILD STATES DISTRICT TODGE
8	Approved as to form and content:	
9	DATED: June 2016	EILEEN M. DECKER
10		United States Attorney LAWRENCE S. MIDDLETON Assistant United States Attorney
11		Chief, Criminal Division STEVEN R. WELK
12		Assistant United States Attorney Chief, Asset Forfeiture Section
13		Ol San A A
14		CHRISTEN A. SPROULE Assistant United States Attorney
15		
16 17		Attorneys for Plaintiff United States of America
18	DATED: June אָי 2016	Chao Ohen 06/16/2016.
19		CHAO CHEN Claimant
20		PRO SE
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## PROOF OF SERVICE BY MAILING

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States
Attorney, Central District of California. My business address is 312 North Spring Street, 14th Floor, Los Angeles, CA 90012.

On <u>June 21, 2016</u>, I served a copy of: <u>[PROPOSED] CONSENT</u>

<u>JUDGMENT</u> upon each person or entity named below by enclosing a copy in an envelope addressed as shown below and placing the envelope for collection and mailing on the date and at the place shown below following our ordinary office practices.

TO: Chao Chen 2850 Kelvin Avenue No. 234 Irvine, CA 92614

X I am readily familiar with the practice of this office for collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on: June 21, 2016 at Los Angeles, California.

S. Beckman SHANNEN BECKMAN