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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$159,421.37 IN U.S. CURRENCY and  
ONE 2002 CADILLAC ESCALADE,

Defendants.

No. CV 16-04922-GW(PLAx)

CONSENT JUDGMENT OF  
FORFEITURE

CHRISTOPHER FLYNN and  
REGINA FLYNN,

Claimants.

Plaintiff and Claimants Christopher Flynn (“C. Flynn”) and Regina Flynn (“R. Flynn”) (collectively, the “Claimants”) have made a stipulated request for the entry of this Consent Judgment, resolving this action in its entirety.

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

3 1. This Court has jurisdiction over the parties and the subject matter of this  
4 action.

5 2. The government has given and published notice of this action as required by  
6 law, including Supplemental Rule G for Admiralty or Maritime Claims and Asset  
7 Forfeiture Actions, Federal Rules of Civil Procedure, and the Local Rules of this Court.  
8 All potential claimants to the defendants other than C. Flynn and R. Flynn are deemed to  
9 have admitted the allegations of the Complaint. The allegations set out in the Complaint  
10 are sufficient to establish a basis for forfeiture.

11 3. \$52,000.00 of the defendant \$159,421.37 in U.S. Currency (“defendant  
12 currency”), without interest, and the defendant One 2002 Cadillac Escalade (“defendant  
13 vehicle”), shall be returned to R. Flynn through her counsel. The United States Marshals  
14 Service shall release said funds by wire transfer to R. Flynn’s counsel, who shall provide  
15 the information necessary to make the wire transfer (including bank account and routing  
16 information) forthwith. R. Flynn and her attorney shall provide any and all information,  
17 including personal identifiers, needed to process the return of these funds according to  
18 federal law. The United States Marshals Service shall make the transfer within 60 days  
19 of the entry of this judgment or its receipt of the necessary information, whichever is  
20 later. The United States Marshals Service shall further make arrangements for R. Flynn  
21 to collect the defendant vehicle within 60 days of the entry of this judgment.

22 4. C. Flynn’s claim to any of the defendant currency is withdrawn.<sup>1</sup>

23 5. The government shall have judgment as to \$107,421.37 of the defendant  
24 currency, plus the interest earned by the United States on the entire amount of the seized  
25 currency since seizure, and no other right, title or interest shall exist therein. The  
26 government shall dispose of the forfeited funds according to law.

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28 <sup>1</sup> C. Flynn filed a claim of interest as to \$89,946.37 of the defendant currency.

1           6.       Claimants have agreed to release the United States of America, its agencies,  
2 agents, and officers, including employees, agents and task force officers of the Drug  
3 Enforcement Administration, from any and all claims, actions or liabilities arising out of  
4 or related to the seizure and retention of the defendants and/or the commencement of this  
5 civil forfeiture action, including, without limitation, any claim for attorneys' fees or costs  
6 which may be asserted on behalf of Claimants against the United States, whether  
7 pursuant to 28 U.S.C. § 2465 or otherwise. If Claimants submitted a petition for  
8 remission to the defendants in any proceedings, Claimants hereby withdraw the petition,  
9 and waive any rights they may have to seek remission or mitigation of the forfeiture of  
10 the defendants.

11           7.       The Court finds that there was reasonable cause for the seizure of the  
12 defendants and the institution of this action. This consent judgment shall be construed as  
13 a certificate of reasonable cause pursuant to 28 U.S.C. § 2465.

14           8.       Each of the parties shall bear its own fees and costs in connection with the  
15 seizure, retention and return of the defendant vehicle or any portion of the defendant  
16 currency.

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18       Dated: February 20, 2018

  
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GEORGE H. WU, U.S. District Judge

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20 Presented by:  
21 NICOLA T. HANNA  
22 United States Attorney  
23 LAWRENCE S. MIDDLETON  
24 Assistant United States Attorney  
25 Chief, Criminal Division  
26 STEVEN R. WELK  
27 Assistant United States Attorney  
28 Chief, Asset Forfeiture Section

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/s/  
KATHARINE SCHONBACHLER  
Assistant United States Attorney