Asset Forfeiture Actions, Federal Rules of Civil Procedure, and the Local Rules of this Court. Potential Claimant, from whom the defendant currency was seized, has agreed to

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forfeit \$25,920.00. The government has not received any claims or answers, and the time for filing claims and answers has expired. This Court has jurisdiction over the parties to this judgment and the defendant currency. Any potential claimants to the defendant currency other than Ramirez are deemed to have admitted the allegations of the complaint. Nothing in this consent judgment is intended or should be interpreted as an admission of wrongdoing by Potential Claimant Ramirez, nor should this consent judgment be admitted in any criminal proceeding against Ramirez to prove any of the facts relied upon to establish reasonable cause for the seizure of the defendant currency.

- 2. The proposed judgment further provides that \$22,000.00 of the defendant currency shall be returned to Ramirez, without interest, and shall be paid to Ramirez no later than forty-five days after the date the Judgment is entered, or the date Ramirez provides the information described below, whichever is later.
- 3. If the United States elects to make the payment of the \$22,000.00 by check, the check shall be payable to the "Richard E. Nahigian client trust account", and mailed to Raul Samano Ramirez in care of his attorney, Richard E. Nahigian, 1122 East Green Street, Pasadena, California 91106. If the United States elects to make the payment by wire transfer, the funds shall be wire transferred to the Richard E. Nahigian Client Trust Account. Claimant agrees to provide the necessary bank account information for the trust account and his personal identifiers upon request from the United States.
- 4. The remaining \$25,920.00 of the defendant currency shall be forfeited to the United States, together with all interest earned by the government on the total amount of defendant currency, and no other right, title, or interest shall exist therein.
- 5. The court finds that there was reasonable cause for the seizure of the defendant currency and the institution of this action. This judgment constitutes a certificate of reasonable cause pursuant to 28 U.S.C. § 2465.

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1	6. Each of the parties shall bear its own fees and costs in connection with the
2	seizure of the defendant currency and this action.
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4	DATED: //, 2018
5	THE HONORABLE STEPHEN V. WILSON UNITED STATES DISTRICT JUDGE
6	STATES BISTING TOPOLE
7	Prepared by:
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9	NICOLA T. HANNA United States Attorney
10	LAWRENCE S. MIDDLETON
11	Assistant United States Attorney Chief, Criminal Division
12	STEVEN R. WELK
13	Assistant United States Attorney Chief, Asset Forfeiture Section
14	
15	/s/Michael R. Sew Hoy MICHAEL R. SEW HOY
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17	Assistant United States Attorney Asset Forfeiture Section
18	Asset I directure section
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