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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANY AND ALL FUNDS SEIZED FROM
VARIOUS ACCOUNTS AT BANK OF
AMERICA, N.A.,

Defendant.

No. CV 22-00826-RGK-AS

~~PROPOSED~~ PARTIAL CONSENT
JUDGMENT OF FORFEITURE [559]

[Not Dispositive of This Action]

SICHONG WANG AND FENGXIANG
GUO,

Claimants.

Plaintiff United States of America ("the government") and
Claimants Sichong Wang and Fengxiang Guo ("Claimants") have made a
stipulated request for the entry of this Partial Consent Judgment,
which is not dispositive of this action.

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

1 1. Notice has been given and published regarding the Defendant
2 Funds as required by law and the Local Rules of this Court. No other
3 claims or answers were filed as to the Defendant Funds identified in
4 Schedule A, and the time for filing such claims has expired.

5 2. On or about March 9, 2022, Claimant Sichong Wang filed
6 timely claims for certain of the Defendant Funds, as identified in
7 Schedule A.

8 3. On September 2, 2022, Claimant Fengxiang Guo filed a claim.

9 4. On September 8, 2022, the Court ordered the claim and
10 notice of interested parties to be stricken for failure to comply
11 with the Court's Local Rules, General Orders, and/or Case Management
12 Order.

13 5. The partial consent judgment provides that certain of the
14 Defendant Funds identified in Schedule A, without interest, shall be
15 returned to Claimants as specified in Schedule A (hereinafter, the
16 "Returned Funds").

17 6. The government shall have judgment as to the portion of the
18 Defendant Funds specified in Schedule A, together with all interest
19 earned on the entire amount of such Defendant Funds since seizure,
20 and no other person or entity shall have any right, title or interest
21 therein.

22 7. If the government elects to make the payment of the
23 Returned Funds by check, the check shall be payable to Claimant
24 Sichong Wang. If the government elects to make the payment by wire
25 transfer, the funds shall be wire transferred to an account
26 designated by Claimant Sichong Wang. Upon request from the
27 government, Claimant Sichong Wang shall provide any necessary bank
28 account information to complete the transfer.

1 8. If the government elects to make the payment of the
2 Returned Funds for Claimant Fengxiang Guo by check, the check shall
3 be payable to the Client Trust account of the Law Offices of James
4 Zhou (the "Zhou Client Trust Account"), and mailed to Claimant
5 Fengxiang Guo in care of his attorney, James Zhou. If the government
6 elects to make the payment by wire transfer, the funds shall be wire
7 transferred to the Zhou Client Trust Account. Upon request from the
8 government, Claimant Fengxiang Guo, through his counsel, shall
9 provide the necessary bank account information to complete the
10 transfer.

11 9. Claimants, and each of them, release the United States of
12 America, its attorneys, agencies, agents, and officers, including
13 employees and agents of the United States Department of Justice,
14 Department of State, and Department of Homeland Security, from any
15 and all claims, actions or liabilities arising out of or related to
16 the seizure and retention of the Defendant Funds and the commencement
17 of this action as it relates to the Defendant Funds, including any
18 claim for attorneys' fees or costs which may be asserted on behalf of
19 Claimants, or either of them, against the United States, whether
20 pursuant to 28 U.S.C. § 2465 or otherwise. Claimants have waived any
21 rights they may have to seek remission or mitigation of the
22 forfeiture.

23 10. The Court finds that there was reasonable cause for the
24 seizure of the Defendant Funds and institution of this action.

25 11. This judgment shall be construed as a certificate of
26 reasonable cause pursuant to 28 U.S.C. § 2465.

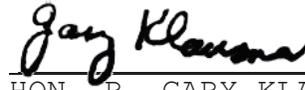
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1 12. Each of the Parties shall bear its own fees and costs in
2 connection with the seizure, retention and efforts to forfeit the
3 Defendant Funds.

4 IT IS SO ORDERED.

5
6 Dated: **September 15**, 2022



HON. R. GARY KLAUSNER
UNITED STATES DISTRICT JUDGE

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9 Presented by:

10 STEPHANIE S. CHRISTENSEN
Acting United States Attorney
11 SCOTT M. GARRINGER
Assistant United States Attorney
12 Chief, Criminal Division
JONATHAN GALATZAN
13 Assistant United States Attorney
Chief, Asset Forfeiture Section

14 _____
 /s/
15 DAN G. BOYLE
Assistant United States Attorney

16
17 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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Schedule A

<u>Account</u>	<u>Claimant</u>	<u>Seized</u>	<u>Returned</u>	<u>Forfeited</u>
X60026	Sichong Wang	\$200,067.00	\$134,044.89	\$66,022.11
X43908	Fengxiang Guo	\$63,917.90	\$42,824.99	\$21,092.91

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