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 14 Attorneys for Plaintiff  
 United States of America

15 UNITED STATES DISTRICT COURT  
 16 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
 17 EASTERN DIVISION

18  
 19 UNITED STATES OF AMERICA,  
 20 Plaintiff,  
 21 v.  
 22 \$14,000.00 IN U.S. CURRENCY,  
 23 Defendant.

No. EDCV 14-01380-JGB (DTBx)  
**CONSENT JUDGMENT OF  
 FORFEITURE**

24  
 25 \_\_\_\_\_  
 ABDUL MAJEED,  
 26 Claimant.

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 28

1 This civil forfeiture action was commenced on July 7, 2014 against the defendant  
2 \$14,000.00 in U.S. Currency seized on February 4, 2014 in Upland, California (the  
3 “defendant currency”). Abdul Majeed (“Majeed”) filed a claim of interest in the  
4 defendant currency on August 14, 2014, and an answer to the complaint on August 14,  
5 2014. No other parties have appeared in this case and the time for filing claims of  
6 interest and answers has expired.

7 Plaintiff United States of America and Majeed have reached an agreement that is  
8 dispositive of the action. The parties hereby request that the Court enter this Consent  
9 Judgment of Forfeiture.

10 WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:

11 1. This Court has jurisdiction over the parties and the subject matter of this  
12 action.

13 2. Notice of this action has been given in accordance with law. All potential  
14 claimants to the defendant currency, other than Majeed, are deemed to have admitted the  
15 allegations of the Complaint. The allegations set out in the Complaint are sufficient to  
16 establish a basis for forfeiture.

17 3. The United States of America shall have judgment as to \$7,000.00 of the  
18 defendant currency and all interest earned on the entirety of the defendant currency since  
19 seizure, and no other person or entity shall have any right, title or interest therein. The  
20 United States is ordered to dispose of said funds in accordance with law.

21 4. \$7,000.00 of the defendant currency, without any interest earned by the  
22 government on the full amount of the defendant currency, shall be returned to Majeed by  
23 either check or wire transfer within 60 days of the date that the Court enters the Consent  
24 Judgment. If the United States elects to make the payment by check, the check will be  
25 payable to “Abdul Majeed” and mailed to Anikó R. Hoover, Esq., 337 N. Vineyard  
26 Avenue, 4<sup>th</sup> Floor, Suite 530, Ontario, California 91764. If the United States elects to  
27 make the payment by wire transfer, the funds will be wire transferred to the account that  
28 Majeed and his attorney provide account and routing numbers for. Majeed and his

1 attorney shall provide any and all information, including personal identifiers, needed to  
2 process the return of these funds according to federal law.

3 5. Majeed agrees to release the United States of America, its agencies, agents,  
4 and officers, including employees, officers and agents of the United States Secret  
5 Service from any and all claims, actions or liabilities arising out of or related to this  
6 action or the underlying seizures, including, without limitation, any claim for attorney's  
7 fees, costs or interest which may be asserted on behalf of Majeed, whether pursuant to  
8 28 U.S.C. § 2465 or otherwise. If Majeed submitted a petition for remission to the  
9 defendant currency in any proceedings, Majeed hereby stipulates to withdraw the  
10 petition, and waive any rights he may have to seek remission or mitigation of the  
11 forfeiture of the defendant currency.

12 6. The Court finds that there was reasonable cause for the seizure of the  
13 defendant currency and institution of these proceedings. This judgment shall be  
14 construed as a certificate of reasonable cause pursuant to 28 U.S.C. § 2465.

15  
16 Dated: December 5, 2016

  
THE HONORABLE JESUS G. BERNAL  
UNITED STATES DISTRICT JUDGE

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22 [Signatures of parties appear on the next page]  
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**Approved as to Form and Content:**

Dated: \_December 1, 2016

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          /s/ Katharine Schonbachler  
KATHARINE SCHONBACHLER  
Assistant United States Attorney

Attorneys for Plaintiff  
United States of America

Dated: \_November 30, 2016

          /s/ Aniko Rushakoff Hoover  
ANIKO RUSHAKOFF HOOVER, ESQ.

Counsel for Claimant  
ABDUL MAJEED

Dated: \_November 30, 2016

          /s/ Abdul Majeed  
ABDUL MAJEED  
Claimant