

1 EILEEN M. DECKER
 United States Attorney
 2 LAWRENCE S. MIDDLETON
 Assistant United States Attorney
 3 Chief, Criminal Division
 STEVEN R. WELK
 4 Assistant United States Attorney
 Chief, Asset Forfeiture Section
 5 CHRISTEN A. SPROULE (Cal. Bar No. 310120)
 Assistant United States Attorney
 6 Asset Forfeiture Section
 1400 United States Courthouse
 7 312 North Spring Street
 Los Angeles, California 90012
 8 Telephone: (213) 894-4493
 Facsimile: (213) 894-7177
 9 E-mail: Christen.A.Sproule@usdoj.gov

10 Attorneys for Plaintiff
 11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT
 13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 ONE 2011 MERCEDES-BENZ SL63
 AMG, \$4,000.00 IN U.S. CURRENCY,
 19 \$322,980.00 IN U.S. CURRENCY,
 20 \$7,603.00 IN U.S. CURRENCY, ONE
 21 MEN'S ROLEX WATCH, AND
 ELEVEN ASSORTED WATCHES,

22 Defendant,

23 _____
 24 LE HOAI LE,
 XIAO LIU, AND
 25 LINH THI TRAN DANG

26 Claimants.
 27
 28

No. CV 16-00458-CJC (DFMx)

[~~PROPOSED~~]

CONSENT JUDGMENT AS TO
 CLAIMANT XIAO LIU ONLY

[This judgment is dispositive as to one
 claimant, but is not case-dispositive]

1 This action was filed on March 9, 2016 against the defendant One 2011 Mercedes-
2 Benz SL63 AMG (“defendant vehicle”), among other defendants. Xiao Liu (“Liu”),
3 from whom the defendant vehicle was seized, claims an interest in the defendant vehicle,
4 and filed a claim and answer to the complaint. No person other than Liu is believed to
5 have an interest in the defendant vehicle. Notice has been given and published in
6 accordance with the law. No other claims or answers have been filed with respect to the
7 defendant vehicle, and the time for filing claims and answers has expired. Plaintiff
8 United States of America and Liu have reached an agreement that is dispositive of all
9 claims concerning the defendant vehicle, and have requested that this consent judgment
10 be entered. Nothing in this consent judgment is intended or should be interpreted as an
11 admission of wrongdoing by Liu.

12 WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:

13 A. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345
14 and 1355 and over the parties hereto.

15 B. The Complaint for Forfeiture states a claim for relief pursuant to 21 U.S.C.
16 § 881(a)(6).

17 C. Notice of this action has been given in accordance with law. All potential
18 claimants to the defendant vehicle other than Liu are deemed to have admitted the
19 allegations of the Complaint. The allegations set out in the complaint are sufficient to
20 establish a basis for forfeiture.

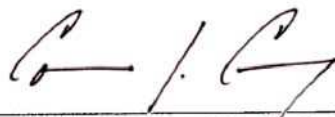
21 D. The defendant 2011 Mercedes-Benz SL63 AMG shall be returned to the
22 claimant, Liu.

23 E. Liu has released the United States of America, its agencies, agents, officers,
24 employees and representatives, including, without limitation, all agents, officers,
25 employees and representatives of the Drug Enforcement Administration and the
26 Department of Justice and their respective agencies, as well as all agents, officers,
27 employees and representatives of any state or local governmental or law enforcement
28

1 agency involved in the investigation or prosecution of this matter, from any and all
2 claims, actions or liabilities arising out of or related to this action, including, without
3 limitation, any claim for attorney fees, costs and interest, which may be asserted by or on
4 behalf of claimant Xiao Liu, whether pursuant to 28 U.S.C. § 2465 or otherwise.

5 The Court finds that there was reasonable cause for the institution of these
6 proceedings. This Judgment shall be construed as a certificate of reasonable cause
7 pursuant to 28 U.S.C. § 2465.

8
9 Dated: January 27, 2017



10 THE HONORABLE CORMAC J. CARNEY
11 UNITED STATES DISTRICT JUDGE

12 **Approved as to form and content:**

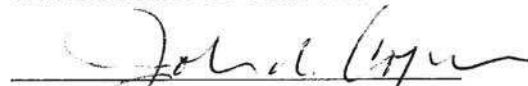
13 DATED: January 23, 2017

14 EILEEN M. DECKER
15 United States Attorney
16 LAWRENCE S. MIDDLETON
17 Assistant United States Attorney
18 Chief, Criminal Division
19 STEVEN R. WELK
20 Assistant United States Attorney
21 Chief, Asset Forfeiture Section

22 
23 CHRISTEN A. SPROULE
24 Assistant United States Attorney

25 Attorneys for Plaintiff
26 United States of America

27 DATED: January 23, 2017

28 
29 JOHN R. COGNORO, ESQ.
30 Attorney for Claimant
31 XIAO LIU

32 DATED: January 25, 2017

33 
34 XIAO LIU
35 Claimant