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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$95,240.00 IN U.S.  
CURRENCY,  
15 Defendant.  
16

CASE NO. 1:17-MC-00030-DAD  
17 CONSENT JUDGMENT OF FORFEITURE

18 Pursuant to the Stipulation for Consent Judgment of Forfeiture, the Court finds:

19 1. On October 18, 2016, agents with the Drug Enforcement Administration (“DEA”)  
20 contacted Raymond Agee Richardson (hereafter “Richardson” or “Potential Claimant”) at the Fresno  
21 Yosemite International Airport in Fresno, California. Approximately \$95,240.00 in U.S. Currency  
(hereafter the “Defendant Currency”) was seized from Richardson during this encounter.

22 2. The DEA commenced administrative forfeiture proceedings, sending direct written notice  
23 to all known potential claimants and publishing notice to all others. On or about February 14, 2017, the  
24 DEA received a claim from Richardson asserting an ownership interest in the Defendant Currency.

25 3. The United States represents that it could show at a forfeiture trial that on October 18,  
26 2016, agents with the Fresno Resident Office Drug Enforcement Administration (“DEA”) responded to  
27 the Fresno Yosemite International Airport and made contact with Austen Glen McCoy (hereafter  
28 “McCoy”). DEA agents observed Richardson make an attempt to separate himself from McCoy as they

1 both disembarked from flight AA2533. A detective with the Fresno County Sheriff's Office asked  
2 Richardson to join McCoy. A DEA agent asked Richardson the purpose for his travel to Fresno.  
3 Richardson answered, "I'd rather not say." When asked how long Richardson planned on staying in  
4 Fresno, Richardson answered, "I'd rather not say." When asked if he carried any weapons, drugs, or  
5 explosive devices, Richardson answered, "No." When asked if he carried any large sums of currency,  
6 Richardson looked away and did not answer. DEA agents observed that Richardson exhibited a pattern  
7 of nervous behavior. DEA agents advised Richardson that he was free to leave at any time. Richardson  
8 consented to a search of his luggage. Inside the luggage, agents located the Defendant Currency.

9 4. The United States could further show at a forfeiture trial that the Defendant Currency is  
10 forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

11 5. Without admitting the truth of the factual assertions contained above, Richardson  
12 specifically denying the same, and for the purpose of reaching an amicable resolution and compromise  
13 of this matter, Potential Claimant agrees that an adequate factual basis exists to support forfeiture of the  
14 Defendant Currency. Potential Claimant hereby acknowledges that he is the sole owner of the  
15 Defendant Currency, and that no other person or entity has any legitimate claim of interest therein.  
16 Should any person or entity institute any kind of claim or action against the government with regard to  
17 its forfeiture of the Defendant Currency, Potential Claimant shall hold harmless and indemnify the  
18 United States, as set forth below.

19 6. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355, as this  
20 is the judicial district in which acts or omissions giving rise to the forfeiture occurred.

21 7. This Court has venue pursuant to 28 U.S.C. § 1395, as this is the judicial district in which  
22 the Defendant Currency was seized.

23 8. The parties herein desire to settle this matter pursuant to the terms of a duly executed  
24 Stipulation for Consent Judgment of Forfeiture.

25 Based upon the above findings, and the files and records of the Court, it is hereby ORDERED  
26 AND ADJUDGED:

27 9. The Court adopts the Stipulation for Consent Judgment of Forfeiture entered into by and  
28 between the parties.

