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

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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$19,575.00 IN U.S.
CURRENCY,
15 Defendant.

2:15-MC-00004-WBS-AC

CONSENT JUDGMENT OF
FORFEITURE

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

18 1. On July 30, 2014, agents with the Drug Enforcement Administration (“DEA”)
19 contacted Daniel Hagel (“Hagel”) at the Sacramento International Airport in Sacramento, California.
20 Approximately \$19,575.00 in U.S. Currency (“defendant currency”) was seized from Hagel during this
21 encounter.

22 2. The DEA commenced administrative forfeiture proceedings, sending direct written
23 notice to all known potential claimants and publishing notice to all others. On or about October 14,
24 2014, the DEA received a claim from Hagel asserting an ownership interest in the defendant currency.

25 3. The United States represents that it could show at a forfeiture trial that on or about
26 On July 30, 2014, 2012, agents with the DEA received information that Hagel was traveling from
27 Sacramento to Los Angeles with a large amount of cash in his bag. When he attempted to proceed
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1 through security, law enforcement officials observed a large amount of cash and personal use amounts
2 of marijuana in Hagel's luggage. The agents confiscated the cash and marijuana and asked Hagel what
3 he was doing in Sacramento. Hagel responded that he went to Chico to discuss a business opportunity
4 – a nutrition meal delivery service – with two partners. Hagel had flown into Sacramento the previous
5 day. According to Hagel, the business partners agreed to invest \$20, 000 total, thus he was returning to
6 Los Angeles with the money.

7 4. The United States could further show at trial that a drug dog positively alerted to the
8 presence of the odor of narcotics on the defendant currency.

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

11 6. Without admitting the truth of the factual assertions contained in this stipulation, Daniel
12 Hagel specifically denies the same, and for the purpose of reaching an amicable resolution and
13 compromise of this matter, Daniel Hagel agrees that an adequate factual basis exists to support
14 forfeiture of the defendant currency. Daniel Hagel hereby acknowledges that he is the sole owner of
15 the 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, Daniel Hagel shall hold harmless and indemnify the United
18 States, as set forth below.

19 7. 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 8. This Court has venue pursuant to 28 U.S.C. § 1395, as this is the judicial district in
22 which the defendant currency was seized.

23 9. 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 10. The Court adopts the Stipulation for Consent Judgment of Forfeiture entered into by and
28 between the parties.

