

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PHILLIP A. TALBERT
United States Attorney
KEVIN C. KHASIGIAN
Assistant U. S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$16,237.00 IN U.S.
CURRENCY,

Defendant.

2:17-MC-00113-KJM-DB

CONSENT JUDGMENT OF FORFEITURE

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

1. On March 17, 2017, agents with the Drug Enforcement Administration (“DEA”) contacted Travis Alvin Laws (“Laws”) at the Sacramento International Airport in Sacramento, California. Approximately \$16,237.00 in U.S. Currency (“defendant currency”) was seized from Laws during this encounter.

2. The DEA commenced administrative forfeiture proceedings, sending direct written notice to all known potential claimants and publishing notice to all others. In late April or early May 2017, claimant Laws filed a claim in the administrative forfeiture proceedings with the DEA with respect to the Approximately \$16,237.00 in U.S. Currency. The United States contends the claim was filed with the DEA on or about May 12, 2017, while Laws contends the claim was filed on April 21, 2017. The parties agree that any dispute over the administrative forfeiture proceedings is resolved pursuant to this settlement agreement.

1 3. The United States represents that it could show at a forfeiture trial that on March 17,
2 2017, agents with the DEA received information regarding suspicious travel by Laws, including the
3 timing and manner of his ticket purchase. Law enforcement agents responded to the terminal, observed
4 Laws exit the flight, and made contact with him in the terminal. The lead agent, displaying his DEA
5 badge, approached Laws, identified himself as law enforcement, and asked for permission to speak with
6 Laws. Laws agreed to speak with the agent. Laws told the agent that he was traveling from Fort
7 Lauderdale, Florida, and was not carrying narcotics, weapons or large sums of cash. Agents asked Laws
8 if he had any checked luggage and he responded in the negative. According to American Airlines, Laws
9 had checked one piece of luggage.

10 4. The United States represents that it could further show at a forfeiture trial that the
11 agents went to the outdoor baggage drop off area to find Laws' checked luggage. The agents
12 identified Laws' luggage and proceeded through the airport to determine if Laws was still in the
13 terminal. The agents observed Laws in the baggage claim area and asked him why he did not tell them
14 about the checked luggage. Laws said he "forgot" about the luggage. Laws agreed to accompany the
15 agents to a private room to conduct a search of the checked luggage.

16 5. The United States represents that it could further show at a forfeiture trial that Laws and
17 the agents proceeded into a separate room to search the Laws' checked luggage. Agents asked Laws
18 twice if there was any money in his luggage and Laws responded, "not in the main pocket." Agents
19 removed all of the clothing in the luggage and found a zippered compartment underneath the clothing.
20 Inside the zippered compartment, agents found thousands of dollars in loose cash. Agents asked Laws
21 how much cash was in the luggage and he stated a "couple of thousand." Laws then changed his
22 statement to between \$13,000 and \$14,000 in cash. Agents found approximately \$16,237.00 in cash in
23 the compartment, denominated as follows: 62 \$1 bills, 43 \$5 bills, 43 \$10 bills, 399 \$20 bills, 57 \$50
24 bills, and 47 \$100 bills.

25 6. The United States represents that it could further show at a forfeiture trial that the cash
26 seized from Laws' luggage was presented to a dog trained to alert to the presence of narcotics odor. The
27 drug dog positively alerted to the presence of the odor of narcotics on the cash seized from Laws'
28 luggage.

1 7. The United States represents that it could further show at a forfeiture trial that the
2 defendant currency is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

3 8. Without admitting the truth of the factual assertions contained above, Travis Alvin
4 Laws specifically denying the same, and for the purpose of reaching an amicable resolution and
5 compromise of this matter, potential claimant agrees that an adequate factual basis exists to support
6 forfeiture of the defendant currency. Laws hereby acknowledges that he is the sole owner of the
7 defendant currency, and that no other person or entity has any legitimate claim of interest therein.
8 Should any person or entity institute any kind of claim or action against the government with regard to
9 its forfeiture of the defendant currency, Laws shall hold harmless and indemnify the United States, as
10 set forth below.

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

13 10. This Court has venue pursuant to 28 U.S.C. § 1395, as this is the judicial district in
14 which the defendant currency was seized.

15 11. The parties herein desire to settle this matter pursuant to the terms of a duly executed
16 Stipulation for Consent Judgment of Forfeiture.

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

19 1. The Court adopts the Stipulation for Consent Judgment of Forfeiture entered into by
20 and between the parties.

21 2. Upon entry of the Consent Judgment of Forfeiture, \$4,000.00 of the Approximately
22 \$16,237.00 in U.S. Currency, together with any interest that may have accrued on the total amount
23 seized, shall be forfeited to the United States pursuant to 21 U.S.C. § 881(a)(6), to be disposed of
24 according to law.

25 3. Upon entry of the Consent Judgment of Forfeiture, but no later than 60 days thereafter,
26 \$12,237.00 of the Approximately \$16,237.00 in U.S. Currency shall be returned to claimant Travis
27 Alvin Laws through his attorney Ian Pancer.

28 //

