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8 Attorneys for Plaintiff

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,)	No. CV 12-3839 DMR
14 Plaintiff,)	
15 v.)	CONSENT ORDER OF SETTLEMENT
16 \$30,064.94 IN FUNDS SEIZED FROM)	AND FORFEITURE
17 BANK OF AMERICA ACCT #)	
18 XXXXX08318, et. al.)	
19 Defendants.)	

20 **CONSENT ORDER OF SETTLEMENT AND FORFEITURE**

21 WHEREAS, on July 23, 2012, the United States filed a complaint for forfeiture of certain
22 currency seized as a result of the activities of signators to \$30,064.94 IN FUNDS FROM ACCT
23 # XXXXX08318; \$8,298.00 IN FUNDS FROM ACCT # XXXXX21933; \$854.53 IN FUNDS
24 FROM ACCT # XXXXX60403, all from BANK OF AMERICA("defendant currency") :

25 WHEREAS, notice of this action has been given by publication and the only claim submitted
26 with respect to the defendant currency is that of Coast Exports, Inc., submitted on or about
27 August 29, 2012;

28 WHEREAS, pursuant to settlement negotiations among the parties, Coast Exports, Inc.,

CONSENT ORDER OR SETTLEMENT AND FORFEITURE
[No. C 12-3839 DMR]

1 agrees to withdraw its claim with respect to \$19,608.74 of the seized defendant currency in any
2 administrative or judicial forfeiture proceeding;

3 WHEREAS, pursuant to settlement negotiations among the parties, the United States has
4 agreed to return \$19,608.73 plus accrued interest of the defendant currency to Coast Exports,
5 Inc., less any debt owed to the United States, any agency of the United States, or any other debt
6 in which the United States is authorized to collect;

7 AND WHEREAS, it appearing to the court from the endorsement of the parties that the
8 parties have agreed to a resolution of this matter with respect to the defendant currency, and
9 deeming it proper so to do;

10 NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

11 1. Notice of this action having been given by publication and there being only the claims filed
12 by Coast Exports, Inc., the default of all persons or entities other than Coast Exports, Inc., is
13 entered.

14 2. A portion of the defendant currency, to wit: \$19,608.74 of the defendant currency, is
15 forfeited to the United States pursuant to 18 U.S.C. § 981(a)(1)(A), 18 U.S.C. § 984, and 31
16 U.S.C. § 5317, free from the claims of any other party.

17 3. A portion of the currency, to wit, \$19,608.73 plus accrued interest of the defendant
18 currency, shall be returned by the United States to Gerard Lam, on behalf of Coast Exports, Inc.,
19 in accordance with the claims of Coast Exports, Inc., to \$19,608.73 plus accrued interest of the
20 defendant currency, less any debt owed to the United States, any agency of the United States, or
21 any other debt in which the United States is authorized to collect.

22 4. The United States shall dispose of the forfeited currency in accordance with law.

23 5. Coast Exports, Inc., releases the United States of America and all of its respective
24 agencies, officers, agents, and employees from any claims or actions, including that for attorney
25 fees or costs or interest, concerning the seizure and custody of the defendant currency.


26 6. The United States releases Coast Exports, Inc., from any claims or actions, including that
27 for attorney fees or costs or interest, concerning the seizure and custody of the defendant
28 currency.

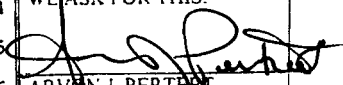
1 7. It is understood and agreed that this Consent Order of Settlement and Forfeiture is entered
2 into by Coast Exports, Inc., for the purpose of avoiding the expense of and inconvenience of
3 litigation. Neither this agreement, nor any action taken to carry out this agreement, shall be
4 construed as giving rise to any presumption or inference of an admission or concession by Coast
5 Exports, Inc., of any fault, wrong doing, or liability whatsoever.

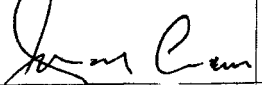
6 8. The parties to this action shall execute any documents necessary or proper to effectuate
7 the terms of this Order.

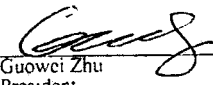
8 9. The case is dismissed with prejudice. Dated: September 12, 2013

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10
11 9/4/13
12 Date


DONNA M. RYU
UNITED STATES MAGISTRATE JUDGE

13 WE ASK FOR THIS:
14
15 
16 ARVON J. PERRETT
Assistant United States Attorney

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19 GERARD LAM
Counsel for Claimants
Coast Exports, Inc.

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22  9/4/13
23 Guowei Zhu
President,
Coast Export, Inc.

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CONSENT ORDER OR SETTLEMENT AND FORFEITURE
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