1		The Honorable Benjamin H. Settle	
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6	UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON		
7	AT TACOMA		
8	UNITED STATES OF AMERICA,	NO. 3:20-cv-06152-BHS	
9	Plaintiff,	CONSENT DECREE AND FINAL	
10	V.	JUDGMENT	
11	ANN LYSE		
12	Defendant.		
13	CONSENT DECREE AND FINAL JUDGMENT		
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15	Plaintiff, United States of America ("Plaintiff"), commenced the above-captioned action in		
	this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Ann Lyse, is		
16	committing or about to commit a banking law violation as defined in 18 U.S.C. § 3322(d),		
17	including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B).		
18	Plaintiff and Defendant, pro se, wish to resolve Plaintiff's allegations without litigation and		
19	jointly request and consent to the entry of this Consent Decree and Final Judgment ("Consent		
20	Decree") without Defendant's admission of liability or wrongdoing. Defendant agrees to waive		
21	service of the Summons and the Complaint.		
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CONSENT DECREE AND FINAL JUDGMENT - 1 No. 3:20-cv-06152-BHS UNITED STATES ATTORNEY 700 Stewart St., Suite 5220 Seattle, Washington 98101 (206) 553-7970

1	Defendant has entered into this Consent Decree freely and without coercion. Defendant	
2	further acknowledges that she has read the provisions of this Consent Decree, understands them,	
3	and is prepared to abide by them.	
4	IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:	
5	1. This Court has jurisdiction over this matter and the parties pursuant to	
6	18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under	
7	28 U.S.C. § 1391(b) and (c).	
8	2. Defendant neither admits nor denies the allegations in the Complaint. Only for	
9	purposes of this action, Defendant admits the facts necessary to establish jurisdiction.	
10	3. For purposes of this Consent Decree:	
11	a. "Defendant" means Ann Lyse.	
12	b. "Person" means an individual, a corporation, a partnership, or any other	
13	entity.	
14	c. "Funds" include any currency, check, money order, stored value card,	
15	stored value card numbers, bank wire transmission, or other monetary value.	
16	d. "Money transmitting business" refers to a person who, for a fee, receives	
17	funds from one person for the purpose of transmitting the funds, or providing access to the	
18	funds, to another person.	
19	e. "Fee" refers to a payment or compensation of any kind regardless of how	
20	the payment or compensation is labeled, including but not limited to processing fees,	
21	service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and	
22	gratuities.	
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CONSENT DECREE AND FINAL JUDGMENT - 2 No. 3:20-cv-06152-BHS

2 from, directly or indirectly, assisting, facilitating, or participating in any money transmitting 3 business. 4 5. Within five (5) days after entry of this Consent Decree, the Defendant is ordered 5 to submit to Postal Inspector Amy Kerkof a written acknowledgement of receipt of this Consent 6 Decree sworn under penalty of perjury. The statement shall be addressed to: 7 U.S. Postal Inspector Amy Kerkof 8 P.O. Box 400 Seattle, WA 98111 206-442-6132 (desk) 10 6. The Consent Decree shall not be modified except in writing by Plaintiff and the 11 Defendant and approved by the Court. 7. This Consent Decree shall constitute a final judgment and order in this action. 8. This Court retains jurisdiction of this action for the purpose of enforcing or modifying this Consent Decree and for the purpose of granting such additional relief as may be 15 necessary or appropriate. 16 January, 2021. 17 AND ORDERED in Chambers at Tacoma, Washington, this 14th day of 18 January, 2021. 12 23	1	4. Upon entry of this Decree, Defendant is permanently prohibited and enjoined		
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CONSENT DECREE AND FINAL JUDGMENT - 3 No. 3:20-cv-06152-BHS

1	APPROVED AND ENTERED B	Y THIS COURT
2	Dated this 14th day of January 2021.	
3		$(\Lambda C$
4		Or Saute
5		BENJAMIN H. SETTLE
6		United States District Judge
7	We hereby concept to the entry of the force	voing Deeree
8	We hereby consent to the entry of the foregoing Decree:	
9		FOR DEFENDANT ANN LYSE
10		$\bigcap \mathcal{O}$
11	Dated: <u><i>OcT. 30</i></u> , 2020	ANN LYSE
12		
13		FOR PLAINTIFF THE UNITED STATES OF
14		AMERICA
15		BRIAN MORAN
16	Dated: November 24, 2020	United States Attorney By: <u>s/Nickolas Bohl</u>
17	Dated: November 24, 2020	NICKOLAS BOHL, WA #48978 Assistant United States Attorney
18		United States Attorney's Office 700 Stewart Street, Suite 5220
19		Seattle, Washington 98101-1271 Phone: 206-553-7970
20		Fax: 206-553-4067 Email: <u>nickolas.bohl@usdoj.gov</u>
21		Linan, <u>mekolas.oom@usuoj.gov</u>
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CONSENT DECREE AND FINAL JUDGMENT - 4 No. 3:20-cv-06152-BHS