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11 Attorneys for Plaintiff
 United States of America

12 UNITED STATES DISTRICT COURT
 13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,)	CV 04-0036-SGL (RNBx)
)	
16 Plaintiff,)	[proposed]
)	CONSENT JUDGMENT
17 v.)	
)	
18 \$237,785.00 IN U.S. CURRENCY,)	
)	
19 Defendant.)	
)	
20)	
21)	
KENT LA, JOHN LA, NANCY LA,)	
22 CINDY LA, DAVID LA, JULIE LA)	
and WILLIAM LA,)	
23)	
Claimants.)	
24)	
25)	

26 In its complaint in this action, plaintiff United States of
 27 America (the "government") alleged that the defendant \$237,785.00 in
 28 U.S. Currency (the "defendant currency") is subject to forfeiture

1 pursuant to 18 U.S.C. § 981(a)(1)(C). Claimants Kent La, John La,
2 Nancy La, Cindy La, David La, Julie La and William La (collectively,
3 the "claimants") filed their claims of interest and answers
4 disputing the government's allegations.

5 The claimants's collective claim to the defendant currency was
6 limited to \$208,000 of the defendant currency, and this court
7 previously entered a default judgment of forfeiture as to the
8 remaining \$29,785.00 of the defendant currency.

9 The parties have agreed to settle this forfeiture action and to
10 avoid further litigation by entering into this consent judgment.

11 The Court, having been duly advised of and having considered
12 the matter, and based upon the mutual consent of the parties,
13 HEREBY ORDERS, ADJUDGES, AND DECREES:

14 1. This Court has jurisdiction over this action pursuant
15 to 28 U.S.C. §§ 1345 and 1355.

16 2. The Complaint states claims for relief pursuant to 18
17 U.S.C. § 981(a)(1)(C).

18 3. Notice of this action has been given as required by
19 law. No appearance has been made in this action by any person other
20 than the claimants, and the time to file claims and answers has
21 expired as to all other potential claimants. The Court deems that
22 all potential claimants other than the claimants admit the
23 allegations of the Complaint to be true, and hereby enters default
24 against all such potential claimants.

25 4. \$29,785.00 of the defendant currency has already been
26 forfeited to the United States.

27 5. The remaining \$208,000 of the defendant currency shall
28 be used toward partial satisfaction of the restitution order in the

1 amount of \$1,678,743.30 to the California State Board of
2 Equalization in The State of California v. La, BA 270564.

3 6. The claimants hereby release the United States of America,
4 the State of California, all counties, municipalities and cities
5 within the State of California, and their agencies, departments,
6 offices, agents, employees and officers, including, but not limited
7 to, the United States Attorney's Office, the Bureau of Alcohol,
8 Tobacco, Firearms and Explosives, and their employees and agents,
9 from any and all, known or unknown, claims, causes of action,
10 rights, and liabilities, including, without limitation, any claim
11 for attorney's fees, costs, or interest which may be now or later
12 asserted by or on behalf any of the claimants, arising out of or
13 related to this action, or the seizure or possession of the
14 defendant currency. The claimants represent and agree that they
15 have not assigned and are the rightful owners of such claims, causes
16 of action and rights.

17 7. The claimants also agree to hold harmless and indemnify
18 the United States, the United States Attorney's Office, the Bureau
19 of Alcohol, Tobacco, Firearms and Explosives and their employees
20 from all claims by third party to any of the \$208,000 being used
21 toward partial satisfaction of the restitution order.

22 8. The Court finds that there was reasonable cause for the
23 seizure of the defendant currency and institution of these
24 proceedings. This judgment shall be construed as a certificate of
25 reasonable cause pursuant to 28 U.S.C. § 2465.

26 9. This Consent Judgment is solely caused by the parties'
27 desire not to further litigate this action, and does not constitute
28 a judgment, order or ruling on the merits of this action or of any

1 litigated matters. This judgement shall not have any res judicata,
2 collateral estoppel, claim preclusion or issue preclusion effects
3 whatsoever.

4 10. The parties shall each bear their own attorney's fees and
5 other costs and expenses of litigation.

6 DATED: _____, 2009

UNITED STATES DISTRICT JUDGE

8 CONSENT

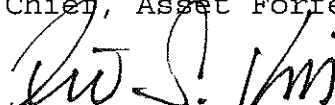
9 The parties consent to judgment and waive any right of appeal.

11 DATED: August 10, 2009

THOMAS P. O'BRIEN
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CHRISTINE C. EWELL
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Chief, Criminal Division

STEVEN R. WELK
Assistant United States Attorney
Chief, Asset Forfeiture Section



PIO S. KIM
Assistant United States Attorney

Attorneys for Plaintiff
United States of America

21 DATED: June __, 2009

[please see next page]

KENT LA
Claimant

24 DATED: July 13, 2009

[please see next page]

JOHN LA
Claimant

(Signature page continues)

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UNITED STATES DISTRICT JUDGE

8 CONSENT

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United States Attorney

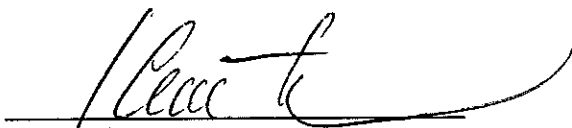
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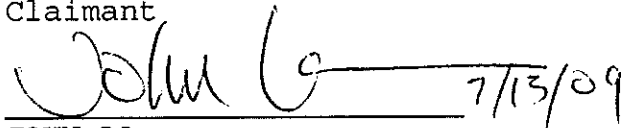
PIO S. KIM
Assistant United States Attorney

Attorneys for Plaintiff
United States of America

21 DATED: June __, 2009


KENT LA
Claimant

24 DATED: June __, 2009


JOHN LA
Claimant

(Signature page continues)

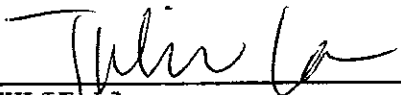
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DATED: ~~June~~ ^{Aug.} 3, 2009




NANCY LA
Claimant

DATED: ~~June~~ ^{Aug.} 3, 2009




JULIE LA
Claimant

DATED: ~~June~~ ^{July} 31, 2009




WILLIAM LA
Claimant

DATED: June 15, 2009



DAVID LA
Claimant


DATED: ~~June~~ ^{Aug.} 3, 2009



CINDY LA
Claimant

Approved as to form and content.

DATED: ~~June~~ ^{August} 5, 2009



PAUL I. GABBERT

Attorney for Claimants
Kent La, John La, Nancy La, Cindy La,
David La, Julie La and William La

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