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 United States of America  
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15 UNITED STATES DISTRICT COURT  
 16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,  
 18  
 Plaintiff,  
 19  
 v.  
 20 HEMATOLOGY ONCOLOGY  
 CONSULTANTS, GP,  
 21  
 Defendant.  
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CR No. 2:21-00026-SVW  
 STIPULATION FOR ENTRY OF MONEY  
 JUDGMENT OF FORFEITURE AGAINST  
 DEFENDANT HEMATOLOGY ONCOLOGY  
 CONSULTANTS, GP  
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24  
 25 The United States of America ("the government") and  
 26 defendant HEMATOLOGY ONCOLOGY CONSULTANTS, GP ("Defendant"), by  
 27 their respective undersigned counsel, respectfully submit this  
 28 stipulation for entry of a Money Judgment of Forfeiture against

1 Defendant in the sum of \$650,000.00, pursuant to the plea  
2 agreement entered into between the government and Defendant.  
3 The proposed Money Judgment of Forfeiture and plea agreement are  
4 being lodged contemporaneously with this stipulation.

5 In the contemporaneously filed plea agreement, Defendant  
6 has agreed to plead guilty to Count One of the Information,  
7 charging a violation of 18 U.S.C. § 545. Defendant has agreed  
8 to forfeit all right, title, and interest in and to the proceeds  
9 of the offense alleged in Count One, totaling \$650,000.00.

10 Pursuant to the plea agreement, the parties hereby  
11 stipulate to the entry of a Money Judgment of Forfeiture against  
12 Defendant in the amount of \$650,000.00 at the time of  
13 sentencing. The entry of the Order is authorized by Rule  
14 32.2(b)(1) and (c)(1) of the Federal Rules of Criminal  
15 Procedure.

16 Once the requested Money Judgment of Forfeiture is entered  
17 and becomes final, the Government may move, at any time after  
18 sentencing, pursuant to Rule 32.2(e)(1)(B), to amend the Money  
19 Judgment of Forfeiture to forfeit specific property of the  
20 Defendant, having a value up to the amount of the money  
21 judgment, as substitute assets.

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By virtue of the plea agreement and Defendant's admission of the amount of money derived from the offense set forth in Count One, for which Defendant has agreed to plead guilty, the parties agree that a Money Judgment of Forfeiture is properly entered against Defendant at the time of sentencing. The statutory basis for the forfeiture order is 18 U.S.C. § 982(a)(2)(B).

1 Dated:

TRACY L. WILKISON  
Acting United States Attorney

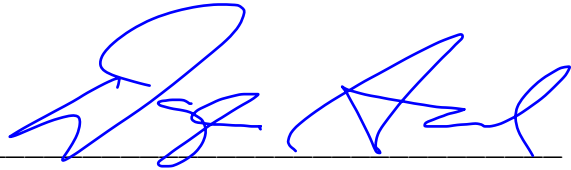
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UNITED STATES OF AMERICA

11 Dated:

*1/28/01*

12  
13 By   
14 DOUGLAS A. AXEL  
15 Attorney for Defendant Hematology  
Oncology Consultants  
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