

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
SALAZAR DOS SANTOS,)
TRUST OF SALAZAR DOS SANTOS,)
and)
TRUST OF AMERICA DOS SANTOS,)
)
Defendants.)

Case No. 3:20-cv-30191-MGM

UNITED STATES' ASSENTED-TO MOTION TO ENTER CONSENT DECREE

The plaintiff United States of America, with the consent of the defendants, Salazar Dos Santos, Trust of Salazar Dos Santos, and Trust of America Dos Santos, hereby moves the Court to enter the attached consent decree. The grounds for this motion are set forth in the consent decree, attached hereto as Exhibit A.

Respectfully submitted,

UNITED STATES OF AMERICA

RACHAEL S. ROLLINS
United States Attorney
District of Massachusetts

By: /s/ Torey B. Cummings
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Dated: May 3, 2023

RULE 7.1 CERTIFICATION

I hereby certify that I have conferred with the defendants in accordance with L.R. 7.1(A)(2).

/s/ Torey B. Cummings
TOREY B. CUMMINGS
Assistant United States Attorney

Dated: May 3, 2023

CERTIFICATE OF SERVICE

I hereby certify that, on this 3rd day of May 2023, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Torey B. Cummings
TOREY B. CUMMINGS
Assistant United States Attorney