

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

UNITED STATES OF AMERICA,	)	CIVIL ACTION NO. 20-1087
Plaintiff	)	
	)	
v.	)	JUDGE HICKS
	)	
WENDI L. LABORDE AND	)	MAGISTRATE JUDGE HORNSBY
CCLCA TRUST	)	
Defendants	)	

**MOTION FOR ENTRY OF JUDGMENT**

Pursuant to Federal Rules of Civil Procedure 58 and 79, the Plaintiff, the United States of America, respectfully moves this Court for entry of a judgment as follows:

1. On August 20, 2020, the United States filed a Complaint to Avoid Fraudulent Transfer against Defendants, Wendi L. Laborde and CCLCA Trust. The Complaint alleges that Wendi L. LaBorde engaged in a fraudulent transfer of funds to CCLCA Trust in order to purchase certain real and personal property and evade the Government's enforcement of a civil judgment against LaBorde. (R. 1).

2. On June 22, 2021, the United States' First Amended Complaint to Avoid Fraudulent Transfer was entered into the record. (R. 21). This Complaint reiterated the allegations against LaBorde and CCLCA Trust made in the original complaint, but also detailed the transaction history for the purchase of the real property where LaBorde currently resides, municipally known as 79885 Ciego Drive, Bermuda Dunes, California 92203 in Riverside County.

3. After both Defendants were properly served and appeared in the suit, the United States filed a Motion for Summary judgment on October 1, 2021. (R. 26, 26-1, 26-1, 26-3, 26-4, and 26-5). LaBorde filed an Opposition to the Government's summary judgment motion on October 14, 2021. (R. 28).

4. On March 03, 2022, after consideration of the pleadings and evidence in the record, this Court issued a memorandum ruling granting the United States' motion for summary judgment. (R. 29).

5. In accordance with its memorandum ruling, the Court issued an order (R. 30) for the following:

- a. That the transfer of \$485,902.60 by LaBorde to CCLCA Trust be declared fraudulent and voided;
- b. That Judgment be entered against the CCLCA Trust in an amount no greater than the amount currently owed to the Government by LaBorde; and
- c. That the Ciego Drive Property currently titled in the name of the CCLCA Trust be properly titled in the name of Wendi LaBorde and be subject to the judgment lien in favor of the United States.

6. As of the date of this filing, LaBorde owes \$437,152 to the Government. (*See Exhibit 1*, Declaration of Sheila Still). Accordingly, this is the amount of the judgment that should be entered against CCLCA Trust pursuant to the Court's Order (R. 30).

7. Additionally, because the Court's Order affects the title to and Government's lien against the real property at 79885 Ciego Drive, Bermuda Dunes, California 92203 in Riverside County, the United States requests that the Court order the Clerk to enter final judgment transferring title of that real property from CCLCA Trust to Wendi LaBorde in the form and manner prescribed by Federal Rule of Civil Procedure 79(b).

8. Based on the foregoing, the United States now moves, under Rule 58 of the Federal Rules of Civil Procedure for entry of judgment as set forth in the Court's Order (R. 30) and requests that the Court approve the form of the judgment submitted herewith or direct such modifications as may be deemed necessary to effectuate its Order (R. 30) for prompt entry by the Clerk.

Respectfully submitted,

BRANDON B. BROWN  
UNITED STATES ATTORNEY

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on March 30, 2022 copies of the foregoing were filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be mailed to Defendants at their last known addresses as follows:

**Wendi LaBorde**  
79885 Ciego Drive  
Bermuda Dunes, CA 92203  
318-470-8783  
PRO SE

**CCLCA Trust**  
Through Linda Feirlein, Trustee  
3524 Eastlake Drive  
Shreveport, Louisiana 71105  
PRO SE

s/ Shannon T. Brown  
Shannon T. Brown (#32366)  
Assistant United States Attorney