

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

U. S. DISTRICT COURT
WESTERN DISTRICT ARKANSAS
FILED

JUN 28 2012

CHRIS R. JOHNSON, CLERK

BY

DEPUTY CLERK

UNITED STATES OF AMERICA,
Plaintiff,

v.

Civil No. 12-5130

\$11,100.00 in UNITED STATES CURRENCY,
Defendant.

VERIFIED COMPLAINT OF FORFEITURE

Comes now plaintiff, the United States of America acting by and through Conner Eldridge, United States Attorney for the Western District of Arkansas, and the undersigned Assistant United States Attorney, and respectfully states as follows:

1. This is a civil action In Rem brought to enforce the provisions of 21 U.S.C. § 881(a)(6) for forfeiture of currency which was used or intended to be used in exchange for controlled substances, or represents proceeds of trafficking in controlled substances; or was used or intended to be used to facilitate a violation of Title II of the Controlled Substances Act 21 U.S.C. §§ 801 et seq.

2. This Court has jurisdiction over this matter by virtue of 28 U.S.C. §§ 1345, 1355(b)(1)(A), and 1395(b).

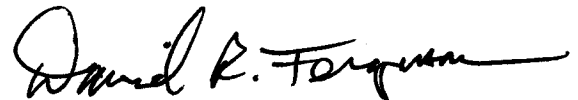
3. The defendant United States currency is in the amount of \$11,100.00 in U.S. currency.

4. The facts and circumstances supporting the forfeiture of the defendant currency are contained in Exhibit "A" attached hereto and incorporated herein by reference.

5. The defendant United States currency is being seized pursuant to 21 U.S.C. § 881(a)(6) as it was used or intended to be used in exchange for controlled substances, or represents proceeds of trafficking in controlled substances; or was used or intended to be used to facilitate a violation of Title II of the Controlled Substances Act 21 U.S.C. §§ 801 et seq.

WHEREFORE, the United States of America prays that a warrant for arrest for the defendant currency be issued; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

CONNER ELDRIDGE
UNITED STATES ATTORNEY



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