

US DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FILED

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

JUL 06 2012

CHRIS R. JOHNSON, Clerk  
By

Deputy Clerk

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Civil No. 12-5139

ONE 2006 TOYOTA TACOMA,  
VIN: 5TELU42N46Z223345,  
Defendant.

**VERIFIED COMPLAINT FOR FORFEITURE**

Comes now the plaintiff, the United States of America 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 provision of 21 U.S.C. § 881(a)(4) for the forfeiture of one 2006 Toyota Tacoma, VIN: 5TELU42N46Z223345 which is a conveyance which was used, or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of a controlled substance in 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, and 1355(b)(1)(A), and 1395(b).

3. The defendant vehicle is described as one

2006 Toyota Tacoma, VIN: 5TELU42N46Z223345.


4. The defendant vehicle is located within the Western District of Arkansas, and will remain within the district pending this action.

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

6. The defendant vehicle is being seized pursuant to 21 U.S.C. § 881(a)(4) as it is a vehicle which was 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 respectfully requests that a warrant for arrest for the defendant vehicle 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 vehicle 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 relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,  
Conner Eldridge  
United States Attorney

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