

SEALED DOCUMENT

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

U.S. DISTRICT COURT
DISTRICT OF N.H.
FILED

2014 JUL -3 A 11: 02

United States of America,)
)
)
Plaintiff,)
)
)
v.)

Civil No. 1:14-CV-294

Six Hundred Ninety Five Dollars (\$695.00) in U.S.)
Currency, more or less, seized from Phat Stuff,)
Keene, New Hampshire;)

JURY TRIAL REQUESTED

Funds in the amount of \$3,737.23, seized from)
TD Bank Business Core Checking Account)
No. 9240737655, in the name of Phat Stuff:)

Funds in the amount of \$906.78, seized from)
TD Bank Business Convenience Checking)
Account No. 9244068759, in the name of)
Phat Stuff;)

Funds in the amount of \$9,871.00, seized from)
TD Bank Savings Account No. 9734334339,)
in the name of Panagiotes J. Eliopoulos;)

One 2011 Ford F 250, NH Registration #2977098,)
Vin #1FT7W2B68BEA60933, registered to)
Panagiotes and Katie Eliopoulos;)

One lot of forty two boxes of assorted glass bongs,)
seized from Phat Stuff, Keene, New Hampshire;)

One lot of twelve boxes of assorted glass water)
pipes, seized from Phat Stuff, Keene, New)
Hampshire;)

One lot of twenty one boxes of assorted glass)
carburetor pipes, seized from Phat Stuff, Keene,)
New Hampshire;)

One box of assorted carburetor pipes, seized from)
Phat Stuff, Keene, New Hampshire;)

One lot of four boxes of assorted glass pipes,)
seized from Phat Stuff, Keene, New Hampshire;)

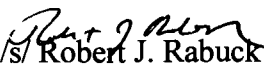
- (b) this matter be scheduled for a jury trial;
- (c) judgment of forfeiture be decreed against the defendants *in rem*;
- (d) the defendants *in rem* be disposed of according to law; and,
- (e) this Court grant the United States of America its costs and whatever other relief to

which it may be entitled.

Respectfully submitted,

JOHN P. KACAVAS
United States Attorney

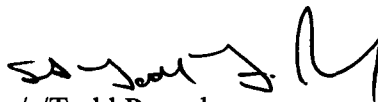
Dated: July 3, 2014

By: 
Robert J. Rabuck
Robert J. Rabuck
NH Bar No. 2087
Assistant U.S. Attorney
District of New Hampshire
53 Pleasant Street
Concord, New Hampshire
603-225-1552
rob.rabuck@usdoj.gov

VERIFICATION

I, Todd Prough, being duly sworn, depose and say that I am a Special Agent with the United States Department of Justice, Drug Enforcement Administration (DEA), and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in Rem* and know the contents therein, and that the same is true to the best of my knowledge, information and belief.

The sources of my information and the grounds of my belief are official records and files of the United States and the State of New Hampshire, and information obtained by me and other law enforcement officers during an investigation of alleged violation of the laws of the United States.



/s/Todd Prough
Todd Prough

STATE OF NEW HAMPSHIRE
COUNTY OF MERRIMACK

Subscribed and sworn to before me this 3rd day of July, 2014.



/s/ Kimberly C. Cooper
Kimberly C. Cooper
Notary Public

My commission expires: September 22, 2015