

IN THE UNITED STATES DISTRICT COURT
THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
v.)	
)	Case No. 14-294-PB
Six Hundred Ninety Five Dollars (\$695.00) in)	
U.S. Currency, more or less, seized from Phat)	
Stuff, Keene, New Hampshire; et al,)	
)	
Defendants <i>in rem</i>)	

VERIFIED CLAIM OF FORD MOTOR CREDIT COMPANY

TO: PLAINTIFF AND ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Ford Motor Credit Company has an interest in the defendant *in rem* property, one 2011 Ford F250, Vin #1FT7W2B68BEA60933, registered to Panagiotes and Katie Eliopoulos.

1. On or about December 29, 2010, Panagiotes J Eliopoulos and Katie A Eliopoulos executed and delivered to Ford Motor Credit a Retail Installment Contract in the principal amount of \$35,258.50. A copy of the contract and Title are attached hereto as Exhibit A.
2. The contract gives Ford Motor Credit a secured interest in one 2011 Ford F250, Vin #1FT7W2B68BEA60933.
3. As of September 3, 2014, the principal and interest balance owing is \$16,535.31. Interest will continue to accrue under the contract at a rate of 6.9% per diem from September 3, 2014.

4. By virtue of Ford Motor Credit Company's interest in the defendant property, Ford Credit Company demands restitution and the right to defend this action.

Respectfully submitted,
Ford Motor Credit
By its attorneys,
Niederman, Stanzel & Lindsey, PLLC

Dated: September 4, 2014

By: /s/ Jay M Niederman
Jay M. Niederman, NH Bar #1874
55 West Webster Street
Manchester, NH 03104
603-668-5960
jay@nslnh.com

VERIFICATION

I, Wendy Smith, am the Team Leader, of Ford Motor Credit Company, and I am authorized to make this verification on its behalf. I have read the foregoing verified claim of Ford Motor Credit Company and know the contents thereof. I am informed and believe that the matters stated are true and on that basis I declare that the matters stated are true. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 4, 2014

/s/ Wendy Smith
Wendy Smith

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served electronically via ECF upon the following:

Rob Rabuck, Esq. rob.rabuck@usdoj.gov
Charles Keefe, Esq. keefe@wbdklaw.com

Exhibit A

01610012

NEW HAMPSHIRE EXAMPLE INTEREST VEHICLE RETAIL INSTALLMENT CONTRACT DATE 12/29/2010

1-800-722-7000 **Ford Credit** www.fordcredit.com

PANAGIOTES J ELIPOPOULOS
KATIE A ELIPOPOULOS
189 WINCHESTER ROAD
RICHMOND NH 03470
RICHMOND

MOUNTREE FORD LINCOLN
115 MONADNOCK HIGHWAY
SMARZEE NH 03446

You, the Buyer and Co-Buyer, if any, may buy the vehicle described below for cash or on credit. The cash price is shown below as "Cash Price." The credit price is shown below as "Total Due Price." By signing this contract, you declare to buy the vehicle on credit on the best and least of this contract.

Year and Make	Model	Vehicle Identification Number	Use For
2011	FORD TRUCK	5-BT F-250	1FT7W2P488EAG0833

1. Cash Price \$42833.00 (1)

2. Down Payment

Third Party Rebate Assigned to Creditor \$ 1500.00

Cash Down Payment \$ 7000.00

Trade-In (deduction shown) \$ 8180.00

Total Down Payment \$ 17420.00 (2)

3. Unpaid Balance of Cash Price (1 minus 2) \$ 25413.00 (3)

4. Amounts paid on your behalf (Seller may be retaining a portion of these amounts):

To Public Officials

(a) for license, title & registration fees \$ 25.00

(b) for official fees \$ N/A

(c) for taxes (not in Cash Price) \$ N/A

Total \$ 25.00 (4)

5. Amount Financed (3 plus 4) \$ 25438.00 (5)

ANNUAL PERCENTAGE RATE	FINANCE CHARGE	Amount Financed	Total of Payments	Total Due Price
6.9%	7891.10	25438.00	43149.50	53749.50

Other Finance Information:

Rate	Amount of Payment	Start Date	Frequency
7.2%	628.20	JANUARY 28 2011	Monthly

Other-Than Product (Optional)

If this loan is showing you purchased the anti-theft product(s) listed below. The purchase of anti-theft product(s) is optional and not required to obtain credit, even if the purchase is shown as included on the vehicle you selected. You may purchase optional product(s) at the time of your choice. If signing below, you agree to purchase the anti-theft product(s) at the price disclosed.

Debt Classification Under Automobile (Optional)

If this loan is showing you have purchased a debt classification under Automobile (Optional) is optional and is not required to obtain credit. The terms and conditions of the debt classification under are set forth in the other installment which is incorporated into this contract. The price for the debt classification under is set forth on this contract in the description of Amount Financed under section 4.

BUYER SIGNATURE: *Katie Elipoulos*

CO-BUYER SIGNATURE: _____

SELLER SIGNATURE: *Chris Hallett*

DATE: 12/29/10

THIS IS TO CERTIFY THAT THIS IS A TRUE AND EXACT COPY OF THE ORIGINAL SALES CONTRACT OF: FORD MOTOR CREDIT COMPANY

SUBSCRIBED AND SWORN TO BEFORE ME THIS 20th day of December 2010

NOTARY PUBLIC: Felana Murray, State of South Carolina, My Commission Expires June 4, 2019

ASSIGNMENT: I hereby assign this contract to another person. That person will then have all Seller's rights, privileges, and remedies. By signing below, the assignee agrees to this contract as if it were his or her own. (Assignee)

ASSIGNEE: FORD MOTOR CREDIT COMPANY

ASSIGNOR: FORD MOTOR CREDIT COMPANY

SEE OTHER SIDE FOR ADDITIONAL AGREEMENTS

ORIGINAL

PLY 1 - ORIGINAL PLY 2 - BUYER'S COPY PLY 3 - CO-BUYER'S/ASSIGNOR COPY PLY 4 - SELLER'S COPY (NON-TRANSFERABLE)

THIS IS TO CERTIFY THAT THIS IS A TRUE AND EXACT COPY OF THE ORIGINAL SALES CONTRACT OF: FORD MOTOR CREDIT COMPANY

BY: *[Signature]* DATE: 12/29/10

SUBSCRIBED AND SWORN TO BEFORE ME THIS 20th day of December 2010

Felana Murray
NOTARY PUBLIC
State of South Carolina
My Commission Expires
June 4, 2019

FELANA MURRAY
NOTARY PUBLIC
SOUTH CAROLINA

CERTIFICATE OF TITLE

STATE OF NEW HAMPSHIRE

VEHICLE IDENTIFICATION NO.
1F7W2B66BEA60833

TITLE NO.

MODEL YR MFG YR GVW
2011 3600

AXLES CYL
2 5

MAKE	MODEL	BODY STYLE	ODOMETER	NEW/USED	ISSUED DATE	PURCHASED DATE
FORD	F250	PKUP	457	NEW	01/20/2011	12/29/2010

ACTUAL MILEAGE: _____ PREVIOUS TITLE & STATE: _____

MAILING ADDRESS

FORD MOTOR CREDIT CO
PO BOX 105704
ATLANTA GA 303485704

THIS IS TO CERTIFY THAT THIS IS A TRUE AND EXACT

OWNER(S) NAME AND ADDRESS

ELIPOULOS, PANAGIOTES J OR
ELIPOULOS, KATIE A
186 WINCHESTER RD
RICHMOND NH 03470

COPY OF THE ORIGINAL TITLE
BRAND/PERMIT INFORMATION
FORD MOTOR CREDIT COMPANY

BY [Signature] DATE 09/03/14
SUBSCRIBED AND SWORN TO BEFORE ME THIS 03 DAY
OF SEPTEMBER 2014
[Signature] NOTARY

FIRST LIENHOLDER NAME AND ADDRESS

FORD MOTOR CREDIT CO
PO BOX 105704
ATLANTA GA 303485704

SECOND LIENHOLDER NAME AND ADDRESS

Kelana Murray
NOTARY PUBLIC
State of South Carolina
My Commission Expires
June 4, 2019



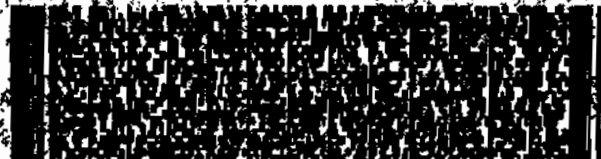
RELEASE OF LIEN

THE LIENHOLDER ON THIS VEHICLE DESCRIBED ON THIS CERTIFICATE DOES HEREBY STATE THAT THE LIEN IS RELEASED.

BY _____ DATE _____
FIRM SIGNATURE OF AUTHORIZED AGENT

BY _____ DATE _____
FIRM SIGNATURE OF AUTHORIZED AGENT

THE DIVISION OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE APPLICANT HEREIN NAMED IS DULY REGISTERED AS THE OWNER OF THE VEHICLE DESCRIBED ABOVE; AND THAT FROM THE STATEMENTS OF THE OWNER AND THE RECORDS ON FILE WITH THIS DIVISION, THE VEHICLE DESCRIBED IS SUBJECT TO THE LIENS ENUMERATED, IF ANY, AND NO OTHERS.



CONTROL NUMBER
DC158803



RICHARD C. BAILEY, JR.
DIRECTOR

TD891 (REV 03/10)

591

VOID IF ALTERED

HOLD TO LIGHT TO VIEW EAGLE WATERMARK

HOLD TO LIGHT TO VIEW EAGLE WATERMARK