

JUDGE RAMOS

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Southern District of New York
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA :

 - v. - :

\$6,185.00 IN UNITED STATES :
CURRENCY, :
 Defendant-in-rem. :
-----X

VERIFIED COMPLAINT
13 Civ.



Plaintiff United States of America, by its attorney,
PREET BHARARA, United States Attorney for the Southern District
of New York, for its verified complaint alleges, upon information
and belief, as follows:

I. NATURE OF THE ACTION

1. This action is brought by the United States of
America pursuant to 21 U.S.C. § 881(a)(6), seeking the forfeiture
of \$6,185.00 in United States currency (the "Defendant-in-rem"),
on the ground that the Defendant-in-rem constitutes moneys
furnished or intended to be furnished in exchange for a
controlled substance, proceeds traceable to such an exchange,
and/or moneys used or intended to be used to facilitate such an
exchange.

II. JURISDICTION AND VENUE

2. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1345 and 1355.

3. Venue is proper under 28 U.S.C. § 1355(b) because acts and omissions giving rise to the forfeiture took place in the Southern District of New York and pursuant to 28 U.S.C. § 1395(c) because the Defendant-in-rem has been transferred to the Southern District of New York.

4. The Defendant-in-rem is currently in the custody of the United States Marshals Service.

III. PROBABLE CAUSE FOR FORFEITURE

5. An investigation regarding moneys furnished or intended to be furnished in exchange for a controlled substance was conducted by the City of Newburgh Police Department (the "CNPD"), agents of the Federal Bureau of Investigation (the "FBI") and other law enforcement agencies. The information set forth in paragraphs six through twelve, below, is based on this investigation.

6. In January 2013, officers from the CNPD initiated an investigation into a narcotics trafficking organization operated by Paul D. Chavis ("Chavis") and Kelly Boykins ("Boykins").

7. In January 2013, a confidential informant ("CI") conducted three separate narcotics purchases from Chavis and Boykins.