

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America,)	
)	
Plaintiff,)	
)	
v.)	Civil 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> .)	
_____)	

**ASSENTED-TO MOTION FOR FINAL ORDER OF FORFEITURE
OF \$566.00 FROM DEFENDANT IN REM (1), AND DEFENDANTS
IN REM (2), (3) AND (5) THROUGH (29)**

The United States moves the Court for entry of a Final Order of Forfeiture of \$566.00 from defendant *in rem* (1) \$695.00 in U.S. Currency, and defendants *in rem* (2), (3), and (5) through (29), in accordance with a Stipulated Settlement Agreement executed by the United States and Panagiotis and Katie Eliopoulos, and filed with the Court.

In support of this motion, the United States of America states as follows:

1. On July 3, 2014, the United States commenced an action by filing a Verified Complaint for Forfeiture in Rem, seeking the forfeiture of the defendants *in rem*, based upon alleged violations of 21 U.S.C. § 881(a)(6) and (10).

2. The United States and Panagiotis and Katie Eliopoulos have reached an agreement which provides for the forfeiture of: \$566.00 from defendant *in rem* (1) \$695.00 in U.S. Currency; (2) Funds in the amount of \$3,737.23, seized from TD Bank Business Core Checking Account No. 9240737655, in the name of Phat Stuff; (3) Funds in the amount of \$906.78, seized from TD Bank Business Convenience Checking Account No. 9244068759, in

the name of Phat Stuff; (5) One 2011 Ford F 250, NH Registration #2977098, Vin #1FT7W2B68BEA60933, registered to Panagiotes and Katie Eliopoulos; (6) One lot of forty two boxes of assorted glass bonges, seized from Phat Stuff, Keene, New Hampshire; (7) One lot of twelve boxes of assorted glass water pipes, seized from Phat Stuff, Keene, New Hampshire; (8) One lot of twenty one boxes of assorted glass carburetor pipes, seized from Phat Stuff, Keene, New Hampshire; (9) One box of assorted carburetor pipes, seized from Phat Stuff, Keene, New Hampshire; (10) One lot of four boxes of assorted glass pipes, seized from Phat Stuff, Keene, New Hampshire; (11) One box of assorted grinders, with screens, seized from Phat Stuff, Keene, New Hampshire; (12) One lot of two boxes of assorted rolling papers, seized from Phat Stuff, Keene, New Hampshire; (13) One lot of four boxes of assorted grinders, seized from Phat Stuff, Keene, New Hampshire; (14) One lot of four boxes of assorted glassware, seized from Phat Stuff, Keene, New Hampshire; (15) One lot of fifteen boxes of assorted hookah pipes, seized from Phat Stuff, Keene, New Hampshire; (16) One lot of two boxes of assorted vaporizers, seized from Phat Stuff, Keene, New Hampshire; (17) One box of assorted diversion safes, seized from Phat Stuff, Keene, New Hampshire; (18) One box of assorted pipes and digital scales, seized from Phat Stuff, Keene, New Hampshire; (19) One box of assorted glass pipes and metal chamber pipes, seized from Phat Stuff, Keene, New Hampshire; (20) One box of assorted diversion hides and stone pipes seized from Phat Stuff, Keene, New Hampshire; (21) One box of assorted glass mouth pieces, seized from Phat Stuff, Keene, New Hampshire; (22) One box of assorted glass mouth pieces, glassware, and electronic cigarettes, seized from Phat Stuff, Keene, New Hampshire; (23) One box of assorted ceramic bonges, seized from Phat Stuff, Keene, New Hampshire; (24) One box of assorted glass chillums, seized from Phat Stuff, Keene, New Hampshire; (25) One box of assorted chillums, seized from Phat Stuff, Keene, New Hampshire;

(26) One box of assorted carburetor pipes and a carburetor mask, seized from Phat Stuff, Keene, New Hampshire; (27) One lot of two boxes of assorted ceramic pipes, seized from Phat Stuff, Keene, New Hampshire; (28) One box of containers of 420 cleaner, seized from Phat Stuff, Keene, New Hampshire; and (29) One box of assorted carburetor masks, seized from Phat Stuff, Keene, New Hampshire.

3. The agreement also provides for the dismissal of \$129.00 from defendant *in rem* (1) Six Hundred Ninety Five Dollars (\$695.00) in U.S. Currency, more or less, seized from Phat Stuff, Keene, New Hampshire, and defendant *in rem* (4) Funds in the amount of \$9,871.00, seized from TD Bank Savings Account No. 9734334339, in the name of Panagiotes J. Eliopoulos, which was addressed in a previous motion, Docket No. 35.

4. In accordance with the Stipulated Settlement Agreement, the United States requests the relief set forth above.

5. Due to the nature of this Motion, no memorandum of law is necessary.

6. Charles J. Keefe, counsel for Panagiotes and Katie Eliopoulos, has assented, through the Stipulated Settlement Agreement, to the relief sought in this Motion.

Respectfully Submitted,

EMILY GRAY RICE
United States Attorney

Dated: April 6, 2016

By: /s/ Robert J. Rabuck
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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April, 2016, a copy of the foregoing Motion was served electronically through ECF on all counsel of record.

/s/ Robert J. Rabuck
Robert J. Rabuck, AUSA