

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,	:	Civil No. 1:24CV329
Plaintiff,	:	
	:	
v.	:	
	:	
192 ROSALYN DRIVE, ROCKINGHAM,	:	
RICHMOND COUNTY, NORTH CAROLINA,	:	
WITH ALL APPURTENANCES AND	:	
IMPROVEMENTS THEREON,	:	
	:	
\$166,990.00 IN U.S. CURRENCY,	:	
	:	
and	:	
	:	
\$2,993.00 IN U.S. CURRENCY,	:	
Defendants.	:	

VERIFIED COMPLAINT OF FORFEITURE

NOW COMES Plaintiff, United States of America, by and through Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, and respectfully states as follows:

1. This is a civil action in rem brought to enforce the provisions of 21 U.S.C. § 881(a) for the forfeiture of the aforesaid defendant properties which were used or intended to be used in any manner or part to commit or to facilitate the commission of a violation of the Controlled Substances Act, 21 U.S.C. §§ 801 et seq., punishable by more than one year's imprisonment, or which constitute proceeds traceable to the exchange of a controlled substance in violation of the Controlled Substances Act.

2. This action is also brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(A) and (C) for the forfeiture of the aforesaid defendant properties which were involved in transactions or attempted transactions in violation of Title 18, United States Code, Section 1956 or 1957, or constitute or were derived from proceeds traceable to an offense constituting specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), or a conspiracy to commit such offense, specifically the exchange of a controlled substance in violation of state and federal law.

3. The defendant properties are as follows:

a. 192 Rosalyn Drive – is all that certain lot or parcel of land known as 192 Rosalyn Drive, Rockingham, Richmond County, North Carolina, with all appurtenances and improvements thereon, more particularly described as follows:

BEING all of Tract #2 according to a survey and plat made by McNeill Surveying and Land Planning, PLLC and duly recorded in Plat Slide 783-E in the Office of the Register of Deds for Richmond County, North Carolina, reference to which recorded plat is hereby made for a more definite description.

(See Exhibit A-1 attached hereto). The record title holder of the subject real property is Mark Meland. The property was acquired by Mark Meland on or about January 10, 2023, by North Carolina General Warranty Deed recorded in the Richmond County Register of Deeds at Book 1953, Pages 613 - 615.

b. \$166,990.00 in U.S. Currency, which was seized on September 20, 2023, in Rockingham, North Carolina, and is currently in the custody of the United States

Marshals Service; and

c. \$2,993.00 in U.S. Currency, which was seized September 20, 2023, in Rockingham, North Carolina, and is currently in the custody of the United States Marshals Service.

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant properties. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. This Court has venue pursuant to 28 U.S.C. § 1355(b)(1) and 1395.

6. The defendant real property 192 Rosalyn Drive has not been seized but is located in this district, and one or more of the acts giving rise to forfeiture occurred in this district. The United States of America does not request authority from the Court to seize the defendant property at this time. The United States will, as provided by 18 U.S.C. § 985(b) and (c)(1):

- a. post notice of this action and a copy of the Complaint on the defendant real property;
- b. serve notice of this action on the defendant real property's owner and any other person or entity who may claim interest in the defendant real property; and
- c. file a Lis Pendens in the county records of the property status as a defendant

in this action.

7. Upon the filing of this complaint, Plaintiff requests that the Court issue an arrest warrant in rem pursuant to Supplemental Rule G(3)(b) as to the U.S. Currency defendants, which Plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

8. The facts and circumstances supporting the seizure and forfeiture of the defendant properties are contained in Exhibit A, attached hereto and wholly incorporated herein by reference.

WHEREFORE, the United States of America prays that process of a Warrant for Arrest and Notice In Rem be issued for the arrest of the defendant U.S. Currency; that judgment be entered declaring the defendant properties be 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.

This the 16th day of April, 2024.

Respectfully submitted,

SANDRA J. HAIRSTON
United States Attorney

/s/ Lynne P. Klauer

Lynne P. Klauer

Assistant United States Attorney

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VERIFICATION

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America, that the contents of the foregoing Verified Complaint of Forfeiture are true and correct to the best of my knowledge, information and belief.



Jeffrey Gruppo
Special Agent
U.S. Food and Drug Administration,
Office of Criminal Investigations