

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	<b>CASE NO.</b>
	:	
v.	:	
	:	
\$3,205.00 IN UNITED STATES	:	
FUNDS,	:	
First-Named Defendant Property,	:	
	:	
ONE 2005 GMC YUKON,	:	
VIN: 1GKFK16Z35J138962,	:	
Second-Named Defendant Property,	:	
	:	
ONE TAURUS PT111 PISTOL,	:	
SERIAL NUMBER: TDR53571, and	:	
Third-Named Defendant Property,	:	
	:	
ONE TAURUS PT111 PISTOL,	:	
SERIAL NUMBER: TET70166,	:	
Fourth-Named Defendant Property.	:	
	:	
	:	

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**VERIFIED COMPLAINT FOR FORFEITURE**

COMES NOW, Plaintiff, the United States of America, by and through its attorney, the United States Attorney for the Middle District of Georgia, brings this complaint and alleges as follows in accordance with Rule G(2) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal Rules of Civil Procedure:

***Nature of the Action***

1. This is a civil action *in rem* brought pursuant to 21 U.S.C. § 881(a)(6), to forfeit and condemn to the use and benefit of the United States of America certain

personal property, to wit: 1) \$3,205.00 in United States funds; 2) One (1) 2005 GMC Yukon, VIN: 1GKFK16Z35J138962; 3) One (1) Taurus PT111 Pistol, Serial Number: TDR53571; and 4) One (1) Taurus PT111 Pistol, Serial Number: TET70166 (hereinafter collectively referred to as "Defendant Property").

***The Defendant in Rem***

2. The First-Named Defendant Property consists of \$3,205.00 in United States funds, seized from the residence of Thaddeus L. Bonds and Arteius C. Cotton, located at 202 Peppertree, Griffin, Georgia, 30224. The First-Named Defendant Property is presently in the custody of the United States Postal Service ("USPS"), and has been deposited into the United States Postal Service Forfeiture Holding Fund Account.

3. The Second-Named Defendant Property consists of one (1) 2005 GMC Yukon, VIN: 1GKFK16Z35J138962, titled in the name of Arteius Chuntera Cotton. The Second-Named Defendant Property is presently in the custody of the USPS, and is currently being stored at 200 Tradeport Boulevard, Suite 209, Atlanta, Georgia, 30354.

4. The Third-Named Defendant Property consists of one (1) Taurus PT111 Pistol, Serial Number: TDR53571, and is registered to Arteius Chuntera Cotton. The Third-Named Defendant Property is presently in the custody of the USPS, and is currently being stored at 200 Tradeport Boulevard, Suite 209, Atlanta, Georgia, 30354.

5. The Fourth-Named Defendant Property consists of one (1) Taurus PT111 Pistol, Serial Number: TET70166, and is registered to Arteius C. Cotton. The Fourth-Named Defendant Property is presently in the custody of the USPS, and is currently

being stored at the facility located at 200 Tradeport Boulevard, Suite 209, Atlanta, Georgia, 30354.

### ***Jurisdiction and Venue***

6. Plaintiff brings this action *in rem* in its own right to forfeit the Defendant Property. 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).

7. This Court has *in rem* jurisdiction over the Defendant Property under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the Plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the Plaintiff will execute upon the Defendant Property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

8. Venue is proper in this District pursuant to 28 U.S.C. § 1355, because acts or omissions giving rise to the forfeiture occurred in the Middle District of Georgia.

9. The seizure was made by the United States Postal Inspection Service, (“USPIS”), which began administrative forfeiture proceedings. On or about October 8, 2013, Arteius C. Cotton, 202 Peppertree, Griffin, Georgia, 30224, filed a claim with the USPIS, after which the USPIS referred the matter to the United States Attorney for the Middle District of Georgia.

### ***Basis For Forfeiture***

10. The Defendant Property is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because it constitutes 1) money furnished or intended to be furnished in exchange for a controlled substance or listed chemical in violation of the Controlled

Substances Act; 2) proceeds traceable to such an exchange; and/or 3) money used or intended to be used to facilitate a violation of the Controlled Substances Act.

***Factual Allegations***

11. Beginning in December of 2010, USPIS began an investigation involving the use of mails by drug traffickers to transport illegal narcotics and drug proceeds to the Macon, Georgia and Phoenix, Arizona areas.

12. The investigation has led to the identity of numerous targets in the Macon, Georgia and Phoenix, Arizona areas, including Arteius C. Cotton and Thaddeus L. Bonds.

13. An inquiry made through the Spalding County Georgia Tax Assessors Office revealed that the residence located at 202 Peppertree, Griffin, Georgia, 30224, was listed in the name of Thaddeus Bonds.

14. As part of that investigation, a Federal Search Warrant was obtained for the residence of Thaddeus L. Bonds and Arteius C. Cotton, located at 202 Peppertree, Griffin, Georgia, 30224, and was executed by USPIS Postal Inspectors on July 17, 2013.

15. The First through the Fourth-Named Defendant Properties were seized during the execution of the Federal Search Warrant which included the following, to wit: 1) \$3,205.00 in United States funds; 2) One (1) 2005 GMC Yukon, VIN: 1GKFK16Z35J138962; 3) One (1) Taurus PT111 Pistol, Serial Number: TDR53571; and 4) One (1) Taurus PT111 Pistol, Serial Number: TET70166.

16. An inquiry made to the Georgia Department of Revenue revealed that the Second-Named Defendant Property (2005 GMC Yukon, VIN: 1GKFK16Z35J138962) was purchased by Arteius C. Cotton on December 28, 2011, and is currently registered in her name. There is no lien on the vehicle.

17. An inquiry made to the Department of Justice, Bureau of Alcohol, Tobacco, Firearms & Explosives, National Tracing Center revealed that the Third-Named Defendant Property (Taurus PT111 Pistol, Serial Number: TDR53571) was purchased by Arteius Cotton on August 10, 2011.

18. An inquiry made to the Department of Justice, Bureau of Alcohol, Tobacco, Firearms & Explosives National Tracing Center revealed that the Fourth-Named Defendant Property (Taurus PT111 Pistol, Serial Number: TET70166) was purchased by Arteius Cotton on February 2, 2013.

### ***Conclusion***

19. Based on the foregoing, probable cause exists to believe that the Defendant Property constitutes money furnished or intended to be furnished in exchange for a controlled substance, in violation of the Controlled Substances Act, 21 U.S.C. § 801, *et seq.*, punishable by more than one year's imprisonment, constitutes proceeds traceable to such an exchange, and/or constitutes money used or intended to be used to facilitate a violation of the Controlled Substances Act, and is therefore subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays that process of warrant issue for the arrest of the Defendant Property; that due notice be given to all parties to appear

and show cause why forfeiture should not be decreed; that judgment be entered declaring the Defendant Property 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.

RESPECTFULLY SUBMITTED, January 6, 2014.

MICHAEL J. MOORE  
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