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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 * * *

10 UNITED STATES OF AMERICA,)
11 Plaintiff,)
12 v.)
13 \$101,635.00 IN UNITED STATES)
CURRENCY,)
14 Defendant.

15 **COMPLAINT FOR FORFEITURE IN REM**

16 The United States of America, by and through Daniel G. Bogden, United States Attorney for
17 the District of Nevada, and Greg Addington, Assistant United States Attorney, in a civil cause for
18 forfeiture, respectfully states as follows:

19 1. This court has jurisdiction under 19 U.S.C. §§ 1603 and 1610; Supplemental Rules for
20 Admiralty or Maritime Claims and Asset Forfeiture Actions; 21 U.S.C. § 881(a)(6); 18 U.S.C. § 983;
21 and 28 U.S.C. §§ 1345 and 1355.

22 2. This court has venue of this matter pursuant to 28 U.S.C. § 1395 because the above-named
23 defendant is now, and during the pendency of this action will be, in the jurisdiction of this court.

24 3. In rem jurisdiction over the defendant property will be obtained through issuance of an
25 appropriate warrant of arrest in rem or supplemental process pursuant to Rule G(3), Supplemental
26 Rules.

1 11. While conducting the inspection of the train, the RPD officers observed Campbell
2 standing outside of a sleeper car compartment wearing a large backpack. Because the Reno
3 AMTRAK stop is a short duration, it is uncommon for sleeper car passengers to carry their luggage
4 outside of their sleeper car compartment during the stop. The RPD officers identified themselves to
5 Campbell. Campbell engaged in a consensual conversation with the RPD officers.

6 12. During the consensual conversation between Campbell and the RPD officers, Campbell
7 stated that he did not have any drugs or large amounts of currency with him. Campbell declined
8 consent to search his backpack.

9 13. While one RPD officer left the area to obtain a trained canine, Campbell returned
10 to his sleeper car compartment with another RPD officer. Campbell placed his backpack on a bed in
11 the sleeper car compartment.

12 14. A canine trained to detect the odor of illegal drugs, including marijuana, alerted to the
13 presence of the odor of such illegal drugs at Campbell's sleeper car compartment and on Campbell's
14 backpack.

15 15. At the time of the consensual conversation with the RPD officers, Campbell exhibited
16 obvious signs of nervousness and anxiety.

17 16. Following the canine alert, Campbell's backpack and a brown duffel-type bag also in
18 Campbell's possession were removed from the sleeper car compartment and placed on the train
19 platform. A canine trained to detect the odor of illegal drugs, including marijuana, alerted to the
20 presence of the odor of such illegal drugs on Campbell's backpack but did not alert to the brown
21 duffel-type bag. Due to cold weather, Campbell's backpack was thereafter moved to an area inside
22 the train station pending application for a search warrant.

23 17. A records check conducted by RPD officers revealed that Campbell had previously been
24 arrested for cultivation of marijuana, possession of a controlled substance, and possession of
25 concentrated cannabis.

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1 18. Based on the totality of circumstances at the scene of the traffic stop, a RPD officer
2 requested the issuance of a search warrant from the Justice Court of Reno Township, Washoe County,
3 Nevada. On April 6, 2011, a judicial officer issued a warrant authorizing a search of the backpack and
4 Campbell's I-Phone.

5 19. Execution of the search warrant yielded the discovery of the defendant currency. The
6 defendant currency was located in Campbell's backpack. The currency was wrapped in two separate
7 vacuum sealed plastic packages with separate bundles of currency bound with rubber bands in each
8 plastic package. The plastic packages containing the currency were each triple-sealed in plastic. The
9 two vacuum-sealed plastic packages were located in a paper bag inside the backpack. Upon discovery
10 of the currency in the backpack, Campbell stated that he would talk about the currency but would not
11 talk about marijuana.

12 20. Following the discovery of the currency in the backpack, Campbell engaged in a
13 consensual conversation with the RPD officers.

14 21. Campbell told the RPD officers that he was going to San Francisco to purchase art
15 from persons who would only transact business with cash. Campbell declined to identify any persons
16 from whom he intended to purchase any art.

17 22. During the consensual conversation with the RPD officers, Campbell acknowledged
18 that he was lying but did not elaborate on what statements were untrue.

19 23. Execution of the search warrant yielded the discovery of information saved in
20 Campbell's I-Phone. The information in Campbell's I-Phone included text messages between
21 Campbell and Kyle Cobey (hereinafter "Cobey"). Cobey was arrested in December 2010 by officers
22 of the RPD after Cobey was found on an east-bound AMTRAK train transporting over 45 pounds of
23 marijuana. The text messages on Campbell's I-Phone include references consistent with Campbell
24 meeting with Cobey in California just prior to Cobey boarding the December 2010 east-bound
25 AMTRAK train with the marijuana. The information in Campbell's I-Phone also included references
26 to marijuana and other terminology commonly used in drug trafficking.

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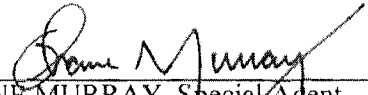
VERIFICATION

I, Shane Murray, am a Special Agent of the Drug Enforcement Administration, United States Department of Justice, and am the agent assigned the responsibility of this case.

I have read the contents of the foregoing Complaint for Forfeiture in Rem, and the statements contained therein are true to the best of my knowledge, information and belief.

I declare and verify under penalty of perjury that the foregoing is true and correct.

DATED: 08/29/2011



SHANE MURRAY, Special Agent
Drug Enforcement Administration