

STATE OF INDIANA) IN KOSCIUSKO CIRCUIT COURT
KOSCIUSKO COUNTY) SS:
CAUSE NUMBER 43C01-1401-MI- 1)

STATE OF INDIANA)
and the)
SYRACUSE POLICE DEPARTMENT)
Plaintiffs)

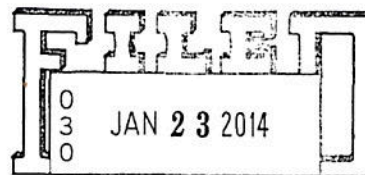
VS.)

SAMUEL S. STIMMEL)
P.O. Box 23)
Kimmell, IN 46760)

One (1) 16 Troy Ounce Platinum Bar)

Fifty Three Thousand Two Hundred Thirty Seven Dollars and Seventy Six Cents (\$53,237.76)
in U.S. Currency)

As Their Interests May Appear,)
Defendants)



Anna Corpey
CLERK KOSCIUSKO CIRCUIT COURT

COMPLAINT FOR FORFEITURE

COMES NOW the Plaintiffs, by counsel, and complain of the Defendant and for claim for relief, allege and say as follows:

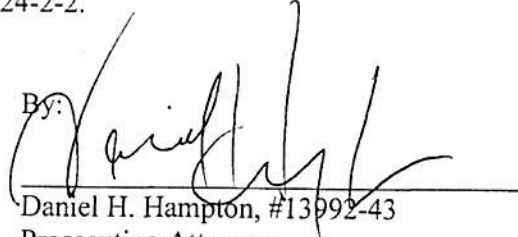
1. That on or about October 30 & 31, 2013, Officers of the Plaintiff seized from the Defendant, Samuel S. Stimmel, the sum of Ten Thousand Five Hundred Eighty Three Dollars and Seventy Five Cents (\$10,583.75) in U.S. Currency, and One (1) Troy Ounce Platinum Bar.
2. That on said date, the Defendant, Samuel S. Stimmel, had in his possession or at his business, Stimmelators and/or California Dreamin, 114 W. Washington Street, North Webster, Kosciusko County, IN 46555, Ten Thousand Five Hundred Eighty Three Dollars and Seventy Five Cents (\$10,583.75) in US currency and One (1) Troy Ounce Platinum Bar, pursuant to a lawful search of the Defendant and his business, and that said currency and platinum bar had been furnished, or was intended to be furnished, in exchange for a violation of the criminal statute, in violation of Indiana Law, as provided in I.C. 34-24-1-1 and/or 34-24-2-2.
3. That on November 1, 2013, the State of Indiana filed a Request to Place a Temporary Hold on the financial accounts of Samuel S. Stimmel and/or Samuel S. Stimmel, DBA: Night Shift of North Webster, located at Teacher's Credit Union in the amount of Forty Two Thousand Six Hundred Fifty Four Dollars and One Cent (\$42,654.01), and that said currency had been furnished, or was intended

to be furnished, in exchange for a violation of the criminal statute, in violation of Indiana Law, as provided in I.C. 34-24-1-1 and/or 34-24-2-2.

4. That said currency and platinum bar are believed to be owned by Samuel S. Stimmel, and he is made a party to this action as his interest may appear.

WHEREFORE, the Plaintiffs demand judgment against the Defendant, Samuel S. Stimmel forfeiture of the sum of Fifty Three Thousand Two Hundred Thirty Seven Dollars and Seventy Six Cents in U.S. Currency, and One (1) 16 Troy Ounce Platinum Bar, and for delivery of said currency and platinum bar upon forfeiture, as provided for in I.C. 34-24-1-1 and/or I.C. 34-24-2-2.

By:

A handwritten signature in black ink, appearing to read "Daniel H. Hampton", is written over a horizontal line.

Daniel H. Hampton, #13992-43
Prosecuting Attorney
54th Judicial Circuit, State of Indiana