

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 07-20027-01-CM-DJW
v.)	
)	
SAMUEL KUONEN,)	
)	
Defendant.)	
)	
_____)	

MOTION FOR PRELIMINARY FORFEITURE ORDER

_____ COMES NOW the United States by and through Eric F. Melgren, United States Attorney for the District of Kansas and Annette B. Gurney, Assistant United States Attorney, and moves the Court to enter a Preliminary Forfeiture Order forfeiting any and all interest of the defendant in the personal property identified in the plea agreement entered into between the United States and the defendant on April 16, 2007. In support of this motion, the United States, states the following:

1. On April 16, 2007, the defendant entered his plea to Counts 1 and 2 of the Information filed on March 23, 2007, and agreed to forfeit all of his interest in the personal property named in the Forfeiture Notice of the Information and in paragraph 8 of the plea agreement.

2. The property includes:

- a. Compaq Deskpro Computer;
- b. Asus Computer;
- c. Three computer hard drives;
- d. Approximately 320 CD Roms and Floppy Disks
- e. Computer Raid Cabinet; and
- f. Miscellaneous Documentation.

3. In the plea agreement and petition to enter plea, the defendant agreed that all of the listed property was used to facilitate the commission of the crime charged in Counts 1 and 2 of the Information.

4. Upon the entry of this order, the United States will proceed to give notice to any third parties who may have an interest in the property and dispose of the property according to law.

Wherefore, for the reasons stated above, the United States respectfully requests that the Court grant its motion and enter a Preliminary Order of Forfeiture.

Respectfully Submitted,

ERIC F. MELGREN
United States Attorney

/s/ Annette B. Gurney
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CERTIFICATE OF SERVICE

This is to certify that on April 18, 2007, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system which will send a notice of electronic filing to the following:

David J. Phillips, Attorney for Defendant.

/s/ Annette B. Gurney
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