

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff)
v.)
299,457.4 USDC, 162.5354 USDT, AND)
6,941.648 TRX SEIZED FROM BINANCE)
ASSOCIATED WITH USER ID)
ENDING IN 3903,)
1,455,143.462248 USDT, 3,032.1689461 SOL,)
67.79400436 BNB, 95,336.8670150 TRX,)
13,703.955431 ADA, AND 0.54151495 ETH)
SEIZED FROM BINANCE ASSOCIATED)
WITH USER ID ENDING IN 7849,)
Defendants *in Rem.*)

Civil No.: 24-CV-10624-NMG

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by its attorney, Joshua S. Levy, Acting United States Attorney for the District of Massachusetts, in a civil action of forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C) alleges that:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355, and venue is appropriate pursuant to 28 U.S.C. § 1395, because acts and omissions giving rise to the forfeiture occurred in the District of Massachusetts.

2. The defendant property consists of the following:

a. 299,457.4 USDC¹, 162.5354 USDT², and 6,941.648 TRX³, seized from a

¹ USD Coin (“USDC”) is a cryptocurrency intended to have a value very close to one US dollar and may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies.

² Tether (“USDT”) is a cryptocurrency intended to have a value very close to one US dollar and may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies.

³ Tronix (“TRX”) is a cryptocurrency utilized by the Tron blockchain and may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other

Binance account with user ID XXXX3903 on dates ranging from on or about January 12, 2024 through January 25, 2024; and

- b. 1,455,143.462248 USDT, 3,032.1689461 SOL⁴, 67.79400436 BNB⁵ 95,336.8670150 TRX, 13,703.955431 ADA⁶, and 0.54151495 ETH⁷ seized from a BINANCE account with user ID XXXX7849 on dates ranging from on or about January 12, 2024 through January 19, 2024

(collectively, the “Defendant Cryptocurrency”).

3. As detailed in the Affidavit of Garrett Fitzgerald Jr., Cyber Special Agent with the United States Secret Service, attached hereto as Exhibit A and incorporated herein by reference, the United States has probable cause to believe that the Defendant Cryptocurrency is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C), because it represents property, real or personal, which constitutes or is derived from proceeds traceable to a violation of a specified unlawful activity, specifically violations of 18 U.S.C. § 1343 (wire fraud). There is also probable cause to believe that the Defendant Cryptocurrency is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), because it represents property, real or personal, involved in a transaction or attempted transaction, specifically violations of 18 U.S.C. § 1956(a)(1)(B)(i) and (h) (money laundering and conspiracy to commit money laundering) or property traceable to such property.

cryptocurrencies.

⁴ Solana (“SOL”) is a cryptocurrency utilized by the Solana blockchain and may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies.

⁵ Binance coin (“BNB”) is a cryptocurrency established by the Binance cryptocurrency exchange and may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies.

⁶ ADA (“ADA”) is a cryptocurrency utilized by the Cardano blockchain and may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies.

⁷ Ether (“ETH”) is a cryptocurrency utilized by the Ethereum blockchain and may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies.

Specifically, there is probable cause to believe that the Defendant Cryptocurrency is subject to forfeiture as proceeds of and involved in an online cryptocurrency romance scam.

WHEREFORE, the United States of America requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshal for the District of Massachusetts, or his designee, commanding seizure of the Defendant Cryptocurrency, and to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;
2. That judgment of forfeiture be decreed against the Defendant Cryptocurrency;
3. That thereafter, the Defendant Cryptocurrency be disposed of according to law; and
4. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

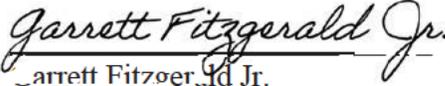
JOSHUA S. LEVY
Acting United States Attorney

By: /s/ Matthew M. Lyons
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Dated: April 26, 2024

Verification

I, Garrett Fitzgerald Jr., Cyber Special Agent for the United States Secret Service state that I have read the foregoing Verified Complaint for Forfeiture *in Rem*, and the Affidavit, attached as Exhibit A, and declare under penalty of perjury that the contents thereof are true to the best of my knowledge, information, and belief.



Garrett Fitzgerald Jr.

Cyber Special Agent

United States Secret Service

Dated: March 13, 2024