

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	
303,992.547 USDT AND 100.896 BNB	)	
SEIZED FROM BINANCE ACCOUNT	)	Civil Action No.: 1:23-CV-12193
ASSOCIATED WITH USER ID xxxx4375	)	
ON APRIL 13, 2023; and	)	
108,551.008 USDT SEIZED FROM	)	
BINANCE ACCOUNT ASSOCIATED WITH	)	
USER ID xxxxx5891 ON APRIL 13, 2023,	)	
Defendants <i>in Rem</i> .	)	

**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 *in rem* pursuant to 18 U.S.C.

§ 981(a)(1)(A) and (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. 303,992.547 USDT<sup>1</sup> and 100.896 BNB<sup>2</sup> seized from Binance account associated with User ID xxxx4375 on April 13, 2023; and,
- b. 108,551.008 USDT seized from Binance account associated with User ID xxxxx5891 on April 13, 2023

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<sup>1</sup> “USDT” is the abbreviation for Tether, a blockchain-based cryptocurrency whose tokens operate as a stablecoin, indicating that each token is equivalent in value to one U.S. dollar.

<sup>2</sup> 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.

(collectively, the “Defendant Property”).

3. As detailed in the Affidavit of Michael Pickett, 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 Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and (C), because it represents property, real or personal, which constitutes or is derived from proceeds traceable to a scheme to defraud in violation of 18 U.S.C. § 1343 and because it represents property involved in a violation of 18 U.S.C. § 1956, or property traceable to such property. Specifically, there is probable cause to believe that some of the Defendant Property is subject to forfeiture as proceeds traceable to an online cryptocurrency investment fraud scam and that all of the Defendant Property is property involved in the subsequent laundering of assets connected to that scam, or traceable to such property.

WHEREFORE, the United States of America requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Secret Service or its designee, commanding seizure of the Defendant Property, 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 Property;
3. That thereafter, the Defendant Property 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/ Brendan T. Mockler  
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Dated: September 26, 2023

Verification

I, Michael Pickett, 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 that the contents thereof are true to the best of my knowledge, information, and belief.



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Michael Pickett  
Special Agent  
United States Secret Service

Dated: September 22, 2023