

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil No. CIV-24-354-GLJ

**CONTENTS OF OKX EXCHANGE
ACCOUNT WITH USER ID
XXXXXXXXXXXXXXXXXXXX2944 SEIZED ON
OR ABOUT DECEMBER 15, 2023 AND
DELIVERED TO THE UNITED STATES
SECRET SERVICE ON OR ABOUT MAY
16, 2024,**

Defendant.

VERIFIED COMPLAINT OF FORFEITURE *IN REM*

COMES NOW the plaintiff, the United States of America, by and through Christopher J. Wilson, United States Attorney for the Eastern District of Oklahoma, and Clay A. Compton, Assistant United States Attorney for the Eastern District of Oklahoma, and brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is an *in rem* forfeiture action brought to forfeit and condemn to the use and benefit of the United States of America the above-captioned defendant, (hereinafter “Defendant Property”), pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C) for violations of 18 U.S.C. §§ 1343 (Wire Fraud), 1349 (Conspiracy to Commit Wire Fraud), 1956 and 1957 (Money Laundering).

THE DEFENDANTS *IN REM*

2. Defendant Property consists of the contents of OKX Exchange account with User ID XXXXXXXXXXXXXXXX2944 totaling 12,620 USDT, held or controlled in the username of Liàn zi yíng, which was seized on or about December 15, 2023, pursuant to a warrant issued by the United States District Court for the Eastern District of Oklahoma and delivered to the United States Secret Service on or about May 16, 2024.

JURISDICTION AND VENUE

3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the Defendant Property pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C). This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the Defendant Property under 28 U.S.C. § 1355(b) and 28 U.S.C. § 1395.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district and pursuant to 28 U.S.C. § 1395, because action accrued in this district or the criminal defendant was found in this district, giving rise to this forfeiture action.

BASIS FOR FORFEITURE

6. The Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C). The United States alleges that the Defendant Property is any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of a specified unlawful activity. Specifically, they constitute traceable proceeds of Wire

Fraud and Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. §§ 1343 and 1349, or are property involved in or traceable to Money Laundering, in violation of 18 U.S.C. §§ 1956 and 1957.

FACTS

7. The facts and circumstances supporting the forfeiture of the Defendant Property are contained in the supporting affidavit attached hereto as Attachment 1, and fully incorporated herein.

8. This complaint does not contain all of the information known in regard to the investigation; however, it contains enough information to establish probable cause to support a complaint for forfeiture against the Defendant Property.

CLAIM FOR RELIEF

9. As a result of the foregoing, the Defendant Property is liable to condemnation and to forfeiture to the United States for its use, in accordance with 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C).

WHEREFORE, the United States of America prays notice of this action be given to all persons who reasonably appear to be potential claimants of interests in the Defendant Property to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the Defendant Property be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

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