

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. 12,324.84 USDT SEIZED FROM BINANCE.COM USER ID # 2974 IN THE NAME OF DUEAN PHIKUNKAEW;
2. CRYPTOCURRENCY SEIZED FROM BINANCE.COM USER ID # 0476 IN THE NAME OF VARAT VITTHAYANUWAT;
3. CRYPTOCURRENCY SEIZED FROM BINANCE.COM USER ID # 5033 IN THE NAME OF WANG XUEWEN;
4. 6,972.2 USDT SEIZED FROM BINANCE.COM USER ID # 3307 IN THE NAME OF JIANG CHANGSEN;

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, (“the United States”) by and through United States Attorney Cole Finegan and Assistant United States Attorney Tonya S. Andrews, pursuant to Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions G(2), states:

JURISDICTION AND VENUE

1. The United States of America (“the United States”) has commenced this action pursuant to the civil forfeiture provisions of 18 U.S.C. § 981(a)(1)(C), seeking forfeiture of the defendant asset as proceeds traceable to one or more violations of 18 U.S.C. § 1343. In addition, the United States has also commenced this action pursuant

to the civil forfeiture provisions of 18 U.S.C. § 981(a)(1)(A), seeking forfeiture of the defendant property involved in violations of 18 U.S.C. §§ 1956 and 1957, or property traceable thereto.

2. This Court has jurisdiction under 28 U.S.C. §§ 1345 and 1355. Venue is proper 28 U.S.C. § 1395, as the defendant property is located, and the acts described herein occurred in the District of Colorado.

DEFENDANT PROPERTY

3. Defendant property is more fully described as:

4. Defendant 12,324.84 US Tether (“USDT”) seized from Binance.com User ID # 133932974 (“User ID # 2974”) in the name of Duean Phikunkaew was seized on March 24, 2023, and is currently in the custody of the Federal Bureau of Investigation.

5. Defendant Cryptocurrency seized from Binance.com User ID # 152600476 (“User ID # 0476”) in the name of Varat Vitthayanuwat, and specifically include approximately 2,116.31641632 USDT and approximately 355.95516855 Binance USD (“BUSD”), was seized on March 24, 2023, and is currently in the custody of the Federal Bureau of Investigation.

6. Defendant Cryptocurrency seized from Binance.com User ID # 11715033 (“User ID # 5033”) in the name of Wang Xuewen consists of the following cryptocurrencies:

- a. 1,169.80719200 Secret Shared Validators (“SSV”)
- b. 143,343.4327 ConstitutionDAO (“PEOPLE”)
- c. 0.19527218 Ethereum (“ETH”)
- d. 144.0632 USDT
- e. 1,857.776701 Tron (“TRX”)
- f. 25,942.552 Chiliz (“CHZ”)

Defendant Cryptocurrency from Binance.com User ID # 5033 was seized on March 24, 2023, and is currently in the custody of the Federal Bureau of Investigation.

7. Defendant 6,972.2 USDT seized from Binance.com User ID # 449993307 (“User ID # 3307”) in the name of Jiang Changsen was seized on March 24, 2023, and is currently in the custody of the Federal Bureau of Investigation.

CRYPTOCURRENCY TERMS

8. Virtual currencies are digital tokens of value circulated over the Internet as substitutes for traditional fiat currency. Virtual currencies are not issued by a government or bank like traditional fiat currencies such as the U.S. dollar but are generated and controlled through computer software. Bitcoin is currently the most well-known virtual currency in use.

9. Virtual currency addresses are the particular virtual locations to which such currencies are sent and received. A virtual currency address is analogous to a bank account number and is represented as a string of alphanumeric characters.

10. Each virtual currency address is controlled through the use of a unique corresponding private key, a cryptographic equivalent of a password needed to access the address. Only the holder of an address’s private key can authorize a transfer of virtual currency from that address to another address.

11. A virtual currency wallet is a software application that interfaces with the virtual currency’s specific blockchain and generates and stores a user’s addresses and private keys. A virtual currency wallet also allows users to send and receive virtual currencies. Multiple addresses can be stored in a wallet.

12. Wallets can be hosted (custodial) or un-hosted (non-custodial or cold

storage/self-custody). A hosted or custodial wallet is a wallet managed by a third party, such as a cryptocurrency exchange. The custodian stores and manages the private keys, keeping funds secure even if a user forgets their password. An un-hosted or noncustodial wallet, also known as cold storage or self-custody wallets, allows the user to maintain a cryptocurrency balance outside of an exchange. Using Ledger or Trezor hardware wallets are examples of un-hosted wallets. With an un-hosted or non-custodial wallet, losing the private key is synonymous with losing access to the cryptocurrencies.

13. Many virtual currencies publicly record all of their transactions on what is a “blockchain”. The blockchain is essentially a distributed public ledger, run by a decentralized network, containing an immutable and historical record of every transaction utilizing that blockchain’s technology. The blockchain can be updated multiple times per hour and record every virtual currency address that ever received that virtual currency. It also maintains records of every transaction and all the known balances for each virtual currency address. There are different blockchains for different types of virtual currencies.

14. USDT is a blockchain-based cryptocurrency whose tokens in circulation are backed by an equivalent amount of U.S. dollars, making it what is known as a “stablecoin”. USDT is issued by Tether Ltd., a company headquartered in Hong Kong. Tether is a subsidiary of Bitfinex, a cryptocurrency exchange registered in the British Virgin Islands.

15. USD Coin (“USDC”) is another stablecoin. Like USDT, it is backed by an equivalent amount of U.S. dollars to maintain a 1:1 ratio between USD and USDC. USDC is managed by a consortium called Centre, which was founded by Circle, Inc.

16. USDT and USDC are hosted on the Ethereum blockchain, among others. Ethereum (“ETH”) is a cryptocurrency that is open source, public, has a blockchain, and is distributed on a platform that uses “smart contract” technology. The public ledger is the digital trail of the Ethereum blockchain, which allows anyone to track the movement of ETH.

17. Smart contracts allow developers to create markets, store registries of debts, and move funds in accordance with the instructions provided without any type of intermediary or counterparty, all while using the Ethereum blockchain protocol to maintain transparency. Smart contract technology is one of Ethereum’s distinguishing characteristics and an important tool for companies or individuals executing trades on the Ethereum blockchain. When engaged, smart contracts automatically execute according to the terms of the contract written into lines of code. A transaction contemplated by a smart contract occurs on the Ethereum blockchain and is both trackable and irreversible.

18. Like other virtual currencies, USDT and USDC are sent to and received from USDT and USDC addresses. USDT and USDC addresses are somewhat analogous to a bank account number, and are represented as a 26-to 35-characterlong, case-sensitive string of letters and numbers. Users can operate multiple USDT and USDC addresses at any given time, with the possibility of using a unique USDT or USDC address for every transaction.

19. Although the identity of an address owner is generally anonymous (unless the owner opts to make the information publicly available), analysis of the blockchain

can often be used to identify the owner of a particular address. The analysis can also, in some instances, reveal additional addresses controlled by the same individual or entity.

20. Cryptocurrency exchanges are companies that exchange Bitcoin and other cryptocurrencies, for other currencies, including fiat. According to the Department of Treasury, Financial Crimes Enforcement Network (“FinCEN”) Guidance issued on March 18, 2013, virtual currency administrators and exchangers, including an individual exchanger operating as a business, are considered money services businesses. Such exchanges are required to register with FinCEN and have proper state licenses (if required under applicable state law).

BACKGROUND

21. Beginning in November 2022, the Federal Bureau of Investigation (FBI) began investigating a cryptocurrency fraud scheme operating out of Southeast Asia and China which targeted victims in the United States and elsewhere, including the District of Colorado. The scammers used various social media and dating platforms to meet victims and coax them into becoming interested in digital investments. The victims were then introduced to fraudulent cryptocurrency platforms and directed to download applications, some of which had embedded malware, and instructed to invest funds in the fraudulent cryptocurrency platforms through international money wires or cryptocurrency transfers.

22. After the money wires or cryptocurrency transfers occurred, the cryptocurrency website, platform, or application, would appear to reflect the victims’ deposits by providing an account summary or statement. To gain the victims’ trust, the fraudulent websites or applications reflected impressive financial gains in the victims’

accounts, leading some victims to invest additional funds at the behest of the scammers. Some victims were allowed to withdraw small amounts of the apparent profits to establish the legitimacy of the fraudulent cryptocurrency platforms. When victims wanted to withdraw their funds, they were told that they were unable to do so and given various excuses as to why they could not withdraw their funds. In some cases, victims were instructed to pay additional fees under the guise that these fees would allow the release of their funds.

23. The scammers gave victims “theft wallets” on fraudulent investment websites. The victims immediately lost access to their funds because they did not have private keys. Once the victim transferred the funds into the theft wallets, the funds were transferred into other unattributed addresses to conceal the nature of the proceeds. Then, most of the funds were consolidated at cryptocurrency exchanges and withdrawn immediately by the scammers. At this juncture, the scammers stopped communicating with their victims, and the victims were locked out of their accounts. This type of scheme is called “Pig Butchering.”

INVESTIGATION

24. In November 2022, the FBI Denver Division received a fraud report from a victim of such a scheme in Denver, Colorado. In August 2022, the Victim was introduced to an individual portraying himself as King Chen Yu, a cryptocurrency trader on an investment platform called DBEX.

25. In total, the Victim invested over \$1,200,000.00 into DBEX before realizing it was a scam that misrepresented investor returns and robbed the Victim of their funds.

Fraud Scheme

26. In August 2022, the Victim received a message from Yu on Airbnb, an online marketplace for short term housing rentals. Yu was interested in renting a property listed by the Victim. Yu and the Victim communicated on the secure messaging application, WhatsApp.

27. Yu did not rent the Airbnb from the Victim, but did engage in frequent communication through WhatsApp, where the two discussed their marital statuses and children.

28. On or about September 27, 2022, Yu spoke to the Victim about an investment platform called DBEX. Yu said that DBEX offered him substantial returns on investing cryptocurrency futures contracts and encouraged the Victim to participate and invest with him on the platform.

29. On or about September 27, 2022, the Victim made her first transfer of 2,930.72275 USDT from her Coinbase.com account to USDT address 0xF79A8dD075FB5dE850a05f5340f445d7949D49AF (“DBEX address 1”).

30. After making the initial investment, the Victim could view her “earnings” on the DBEX platform, which amounted to approximately 22% in gains, increasing her initial investment from 2,930.72275 USDT to 3,576.80 USDT. This encouraged the Victim to make additional investments.

31. From September 27, 2022, to October 18, 2022, the Victim made the following five total investments:

Transfer 1	September 27, 2022	2,930.72275 USDT to USDT address 0xF79A8dD075FB5dE850a05f5340f445d7949D49AF ("DBEX address 1").
Transfer 2	September 30, 2022	48,988.775447 USDT to DBEX address 1
Transfer 3	October 3, 2022	137,185.837296 USDT to USDT address 0xE22fD185685b3F83849f5bDC26aB8F5b39F9EA96 ("DBEX address 2")
Transfer 4	October 12, 2022	242,105.80952 USDT to USDT address 0x803bEE341f94Ef8a194227596d48804E73590764 ("DBEX address 3")
Transfer 5	October 18, 2022	844,990.00 USDC to USDC address 0x3E98B0Bd7a13Ebb134524E186b14f9a5aCDCb045 ("DBEX address 4")

32. In total, between September 27, 2022, and October 18, 2022, the Victim made five investments totaling \$1,276,201.00 USD from her Coinbase account into the four DBEX addresses.

33. On October 19, 2022, the Victim tried to withdraw a portion of her funds to pay off her mortgage. The customer service on the DBEX website told the Victim that she would need to pay taxes on her withdrawal, and that the taxes could not be paid through the gains on her account. At this time, the Victim realized the DBEX platform was a scam.

Facilitating Binance.com Wallets

34. The blockchain analysis showed that after the Victim's cryptocurrency went into the initial four DBEX wallet addresses, most of the funds were sent through a series of USDT and USDC wallet addresses before eventually being deposited into accounts at Binance.com.

35. Six individuals held Binance.com accounts that were directly involved in the receipt of funds linked to the fraud against the Victim.

Transfer 1

36. On September 27, 2022, Victim-1 transferred approximately 2,929.37 USDT on the Ethereum blockchain from her Coinbase.com account to DBEX address 1. On September 27, 2022, DBEX address 1 transferred approximately 2,929.37 USDT to an address beginning with 0x2f2bFb34.

37. These funds have been traced to wallets not associated with an exchange.

Transfer 2

38. On September 30, 2022, the Victim transferred approximately 48,988.78 USDT on the Ethereum blockchain from her Coinbase.com account. On the same day, DBEX address 1 transferred approximately 52,892.00 USDT to an address beginning with 0x2f2bFb34. From there, approximately 60,000.00 USDT was transferred to an address beginning with 0xdb040767.

39. On the same day, address 0xdb040767 sent approximately 60,000.00 USDT to an address beginning with 0x5F93D0ZE. On October 1, 2022, address

0x5F93D0ZE transferred approximately 183,225.00 USDT to an address beginning with 0x6e429Fe6.

40. On October 1, 2022, address 0x6e429Fe6 sent four transfers ranging from approximately 1,237.00 USDT to 14,128.00 USDT and totaling 37,420.00 USDT, to a wallet address beginning with 0x546b8bee (Wallet address 0x546) located in Binance User ID # 2974 held in the name of Duean Phikunkaew.

41. On October 2, 2022, address 0x6e429Fe6 also sent two transfers totaling approximately 148,708.00 USDT to an address beginning with 0x6FD1E8A4.

42. On the same day, and within minutes, address 0x6FD1E8A4 also received two additional transfers, totaling 151,071.00 USDT.

43. On October 2, 2022, address 0x6FD1E8A4 sent approximately 10,000.00 USDT to a wallet address beginning with 0x4fd8f5E3 located in Binance User ID# 0476 held in the name of Varat Vitthayanuwat.

Transfer 3

44. On October 3, 2022, the Victim transferred approximately 137,185.84 USDT on the Ethereum blockchain from her Coinbase.com account to DBEX address 2.

45. These funds have been traced to wallets not associated with an exchange.

Transfer 4

46. On October 12, 2022, the Victim transferred approximately 242,105.81 USDT on the Ethereum blockchain from her Coinbase.com account to DBEX address 3. On the same day, DBEX address 3 transferred approximately 242,251.00 USDT to an address beginning with 0x2f2bFb34. Within seconds of address 0x2f2bFb34 receiving

approximately 242,251.00 USDT, approximately 240,000.00 USDT was transferred to an address beginning with 0xdb040767. Then, 260,000.00 USDT was transferred to an address beginning with 0x5F93D07E.

47. On October 14, 2022, address 0x5F93D07E transferred approximately 134,048.00 of the 260,000 USDT received to an address beginning with 0x6e429Fe6.

48. On October 15, 2022, address 0x6e429Fe6 conducted six transfers within three hours ranging from 2,646.00 USDT to 74,212.00 USDT and totaling approximately 225,648.00 USDT to Wallet address 0x546 located in Binance User ID # 2974 held in the name of Duean Phikunkaew.

49. On October 15, 2022, address 0x5F93D07E also transferred 100,000.00 USDT of the 260,000.00 USDT to an address beginning with 0x450195A3.

50. On October 22, 2022, address 0x450195A3 transferred 22,152.00 USDT to a wallet address beginning with 0xBFbB7271 located in Binance User ID# 5033 held in the name of Wang Xuewen.

Transfer 5

51. On October 18, 2022, the Victim transferred approximately 844,987.00 USDC on the Ethereum blockchain from her Coinbase.com account to DBEX address 4. Within minutes of receiving the transfer, DBEX address 4 transferred approximately 844,987.00 USDC to an address beginning with 0x2f2bFb34.

52. Continuing on October 18, 2022, address 0x2f2bFb34 transferred approximately 844,987.00 USDC to an address beginning with 0x0563eB14. Within minutes, address 0x0563eB14 sent approximately 844,987.00 USDC to an address

beginning with 0x8d5B100D. Approximately 844,987.00 USDC was then sent immediately to Uniswap.

53. Uniswap is a cryptocurrency exchange, which uses a decentralized network protocol which facilitates automated transactions between cryptocurrency tokens on the Ethereum blockchain through the use of smart contracts.

54. On October 19, 2022, approximately 844,987.00 USDC was exchanged for approximately 844,318.40 USDT and then deposited back into address 0x8d5B100D.

55. From October 19, 2022, through October 29, 2022, address 0x8d5B100D received approximately 1,296,074.76 USDT and transferred a 1,299,960.00 USDT to other wallet addresses.

56. Specifically, on October 28, 2022, address 0x8d5B100D sent approximately 402,144.00 USDT to wallet address beginning with 0xDB19dc86. On October 29, 2022, approximately 66,278.00 USDT was then transferred from wallet address beginning with 0xDB19dc86 to Wallet address 0x546 located in Binance User ID# 2974 held in the name of Duean Phikunkaew.

57. In addition, on October 29, 2022, address 0x8d5B100D sent approximately 6,285.00 USDT to wallet address beginning with 0x3a7A1EB1. On the same day, address 0x3a7A1EB1 transferred 6,285.00 USDT to a wallet address beginning with 0xE8Db93DE located in Binance User ID # 3307 held in the name of Jiang Changsen.

Defendant Binance.com User IDs

12,331 USDT seized from Binance.com User ID # 133932974 in the name of Duean Phikunkaew

58. Binance User ID # 2974 was opened on April 25, 2021, by Duean Phikunkaew, a citizen of the Kingdom of Thailand. Wallet address 0x546 is a wallet within Binance.com User ID # 2974 held in the name of Duean Phikunkaew.

59. In total, between July 1, 2021, and November 21, 2022, Wallet address 0x546 received nearly \$33 million worth of USDT in 1,271 transactions.

60. As stated above, Wallet address 0x546 received the following transfers, a portion of which was directly traceable to the Victim's funds:

- I. On October 1, 2022, 37,4200.00 USDT was transferred into Wallet address 0x546;
- II. On October 15, 2022, approximately 225,648.00 USDT was transferred into Wallet address 0x546; and
- III. On October 29, 2022, approximately 66,278.00 USDT was transferred into Wallet address 0x546;

61. On March 24, 2023, the FBI executed a federal seizure warrant for Binance.com User ID # 2974. FBI seized defendant 12,324.84 USDT from Binance.com User ID # 2974 in the name of Duean Phikunkaew.

Cryptocurrency seized from Binance.com Account # 152600476 in the name of Varat Vitthayanuwat

62. Binance User ID # 0476 was opened on November 5, 2021, by Varat Vitthayanuwat, a citizen of the Kingdom of Thailand. Wallet address 0x4fd8f5E3 is a wallet within Binance.com User ID # 0476 in the name of Varat Vitthayanuwat.

63. From November 28, 2021, to November 21, 2022, Wallet address 0x4fd8f5E3 received approximately \$1.3 million worth of USDT in 96 transactions.

64. As stated above, on October 2, 2022, Wallet address 0x4fd8f5E3 received 10,000.00 USDT, a portion of which was directly traceable to the Victim's funds.

65. On March 24, 2023, the FBI executed a federal seizure warrant for Binance.com User ID# 0476 in the name of Varat Vitthayanuwat. FBI seized defendant 2111.816416 USDT and defendant 351.95516855 BUSD from Binance.com User ID# 0476 in the name of Varat Vitthayanuwat.

Cryptocurrency seized from Binance.com User ID # 11715033 in the name of Wang Xuewen

66. Binance User ID # 5033 was opened on May 12, 2017. It is held in the name of Wang Xuewen, a citizen of the People's Republic of China. Wallet address 0xBFbB7271 is a wallet within Binance.com User ID # 5033 in the name of Wang Xuewen.

67. From February 19, 2021, to October 25, 2022, Wallet address 0xBFbB7271 received approximately 656,720.00 worth of USDT in 90 transactions.

68. As stated above, on October 22, 2022, Wallet address 0xBFbB7271 received approximately 22,152.00 USDT, of which a portion of funds were directly traceable to the Victim's funds.

69. On March 24, 2023, the FBI executed a federal seizure warrant for Binance.com User ID # 5033 in the name of Wang Xuewen. FBI seized the following defendant cryptocurrencies from Binance.com User ID # 5033 in the name of Wang Xuewen:

- a. 1,169.80719200 Secret Shared Validators ("SSV")

- b. 143,343.4327 ConstitutionDAO (“PEOPLE”)
- c. 0.19527218 Ethereum (“ETH”)
- d. 144.0632 USDT
- e. 1,857.776701 Tron (“TRX”)
- f. 25,942.552 Chiliz (“CHZ”)

6,972.2 USDT seized from Binance.com User ID # 449993307 in the name of Jiang Changsen

70. On May 8, 2022, Binance User ID # 3307 was opened in the name of Jiang Changsen, a citizen of the People’s Republic of China. Wallet address 0xE8Db93DE is a wallet within Binance.com User ID # 3307 held in the name of Jian Changsen.

71. From May 14, 2022, to November 21, 2022, Wallet address 0xE8Db93DE received approximately \$1.4 million worth of USDT in 169 transactions.

72. As stated above, on October 29, 2022, Wallet address 0xE8Db93DE received a total of approximately 36,285.00 USDT, a portion of which was directly traceable to the Victim’s funds.

73. On March 24, 2023, the FBI executed a federal seizure warrant for Binance.com User ID # 3307 in the name of Jian Changsen. FBI seized defendant 6,967.7 USDT from Binance.com User ID # 3307 in the name of Jian Changsen.

Conclusion

74. Accordingly, the defendant assets constitute or were derived from proceeds of wire fraud, and constitute property involved in specified unlawful activity, and are therefore forfeitable to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C).

VERIFICATION OF DANIEL HEETHER
SPECIAL AGENT, FEDERAL BUREAU OF INVESTIGATION

I, Federal Bureau of Investigation Special Agent Daniel Heether hereby state and aver under the pains and penalties of perjury that I have read the foregoing Factual Basis for Forfeiture and that the facts and information contained therein are true.

s/Daniel Heether
Daniel Heether
Special Agent – FBI

FIRST CLAIM FOR RELIEF

75. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

76. By the foregoing and other acts, defendant 12,324.84 USDT seized from Binance.com User ID # 2974 in the name of Duean Phikunkaew constitutes property involved in violation of 18 U.S.C. §§ 1956 and 1957, or property traceable to such property, and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

SECOND CLAIM FOR RELIEF

77. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

78. By the foregoing and other acts, defendant 12,324.84 USDT seized from Binance.com User ID # 2974 in the name of Duean Phikunkaew constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. §

1343, and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

THIRD CLAIM FOR RELIEF

79. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

80. By the foregoing and other acts, defendant Cryptocurrency Seized from Binance.com User ID # 0476 in the name of Varat Vitthayanuwat constitutes property involved in violation of 18 U.S.C. §§ 1956 and 1957, or property traceable to such property, and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

FOURTH CLAIM FOR RELIEF

81. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

82. By the foregoing and other acts, defendant Cryptocurrency seized from Binance.com User ID # 0476 in the name of Varat Vitthayanuwat constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. § 1343, and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FIFTH CLAIM FOR RELIEF

83. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

84. By the foregoing and other acts, defendant Cryptocurrency seized from Binance.com User ID # 5033 in the name of Wang Xuewen constitutes property

involved in violation of 18 U.S.C. §§ 1956 and 1957, or property traceable to such property, and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

SIXTH CLAIM FOR RELIEF

85. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

86. By the foregoing and other acts, defendant Cryptocurrency seized from Binance.com User ID # 5033 in the name of Wang Xuewen constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. § 1343, and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

SEVENTH CLAIM FOR RELIEF

87. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

88. By the foregoing and other acts, defendant 6,972.2 USDT seized from Binance.com User ID # 3307 in the name of Jiang Changsen constitutes property involved in violation of 18 U.S.C. §§ 1956 and 1957, or property traceable to such property, and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

EIGHTH CLAIM FOR RELIEF

89. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

90. By the foregoing and other acts, defendant 6972.2 USDT seized from Binance.com User ID # 3307 in the name of Jiang Changsen constitutes or was derived

from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. § 1343, and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, the United States prays for entry of a final order of forfeiture for the defendant assets in favor of the United States, that the United States be authorized to dispose of the defendant assets in accordance with law, and that the Court enter a finding of probable cause for the seizure of the defendant assets and issue a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465.

DATED this 29th day of September 2023.

Respectfully submitted,

COLE FINEGAN
United States Attorney

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