

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	NO: 6:25-CV-00246
	§	
793,510.506954 USDT	§	
Defendant.	§	

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

In accordance with Fed. R. Civ. P. Supplemental Rule G(2), the United States of America, Plaintiff, brings this complaint and alleges as follows:

Nature of the Action

1. This is an action to forfeit property to the United States for violations of 18 U.S.C. §§ 1343, 1349, 1956, and 1956(h).

Defendant In Rem

2. The Defendant Property is a total of 793,510.506954 in USDT seized from Tether deposit addresses 0xbeB0036BC0939D805bB9fCFEc704aF3Cb7C29Ba5 (“0xbeB00”) and 0xDD8A10Df4c86a3584D3ef970BbCD85391c8117Ab (“0xDD8A1”) on or about April 4, 2025 pursuant to a seizure warrant approved by a United States Magistrate Judge for the Eastern District of Texas in Case No. 6:24-MJ-289 (the “Defendant Property”). The Defendant Property remains in the custody of the Federal Bureau of Investigation (FBI).

### Jurisdiction and Venue

3. The Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

4. The Court has *in rem* jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

### Basis for Forfeiture

6. The Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is personal property involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 and 1956(h), or any property traceable to such property, and pursuant to 18 U.S.C. § 981(a)(1)(C) because it is personal property which constitutes or is derived from proceeds traceable to a violation of any offense constituting a specified unlawful activity (as defined in 18 U.S.C. § 1956(c)(7)), namely, a violation of 18 U.S.C. § 1343, or a conspiracy to commit such offense (18 U.S.C. § 1349).

### Facts

7. The facts and circumstances supporting the forfeiture of the above-described property are attached in the affidavit by FBI Special Agent Ian Hetrick.

Potential Claimants

8. The known claimant to the Defendant Property is:
  - a. Lindsey Harrison  
Tyler, Texas  
c/o [lindsey.s.harrison@gmail.com](mailto:lindsey.s.harrison@gmail.com)

The United States's investigation was based on tracing victim funds from initial transactions through other accounts whose owners' true identities could not be determined (as explained in the supporting affidavit of SA Hetrick). Nonetheless, the United States will still publish notice of this suit consistent with the Federal Rules of Civil Procedure, specifically Supplemental Rule G.

Claim for Relief

9. The United States respectfully requests that the Court forfeit the Defendant Property to the United States, award costs and disbursements in this action to the United States and order any other relief that the Court deems appropriate.

Respectfully submitted,

JAY R. COMBS  
ACTING UNITED STATES ATTORNEY

*/s/ Robert Austin Wells*  
ROBERT AUSTIN WELLS  
Assistant United States Attorney  
Texas State Bar Number 24033327  
110 North College, Suite 700  
Tyler, Texas 75702  
(903) 510-9350  
[robert.wells3@usdoj.gov](mailto:robert.wells3@usdoj.gov)

**VERIFICATION PURSUANT TO 28 U.S.C. § 1746**

I, Ian Hetrick, hereby state that:

1. I am a Special Agent with the Federal Bureau of Investigation.
2. I have read this Complaint, and the information contained herein is true and correct to the best of my knowledge.
3. The information contained in this Complaint comes from the official files and records of the United States, statements from other law enforcement officers, and my investigation of this case.

I state and verify under penalty of perjury that the foregoing is true and correct.



---

Ian Hetrick  
Special Agent  
Federal Bureau of Investigation

Dated: JUNE 30, 2025