

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

UNITED STATES OF AMERICA

v.

Approximately \$499,999.00 in Funds seized
from Bank of America Account
XXXXXXXXXX3200, such account held in the
name of Valur Holding LLC

CASE NO. 4:24-cv-00563

NOW COMES the United States of America, Plaintiff herein, by and through
Damien M. Diggs, United States Attorney for the Eastern District of Texas, in a
civil cause of forfeiture, and respectfully states the following:

INTRODUCTION

1. This is a civil action *in rem* pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C).
Procedures for this action are mandated by Rule G of the Supplemental Rules for
Admiralty or Maritime Claims and Asset Forfeiture Actions and, to the extent
applicable, 18 U.S.C. §§ 981, 983, and 984, and the Federal Rules of Civil
Procedure.

2. This action seeks the forfeiture of all right, title, and interest in the above-
captioned \$499,999.00 in funds seized from Bank of America Account
XXXXXXXXXX3200, such account held in the name of Valur Holding LLC; such
account held by or for the benefit of, or in the names of Nan Gang and Kenji

Toumi (hereinafter, “Defendant Property”). The Defendant Property constitutes or is derived from proceeds of wire fraud in violation of 18 U.S.C. § 1343, and property involved in monetary transactions and a money laundering conspiracy in violation of 18 U.S.C. §§ 1957 and 1956(h).

3. This Court has jurisdiction over this action commenced by the United States under 28 U.S.C. § 1345 and over this action for forfeiture under 28 U.S.C. § 1355(a). The Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

4. This Court has venue pursuant to 28 U.S.C. §§ 1355 and 1395. Venue is proper because the acts or omissions giving rise to the forfeiture occurred in this district and the defendant property was found in this district.

5. As set forth more fully below, the Defendant Property was derived from investment scams perpetrated on United States’ residents. The victims are often elderly and vulnerable seeking companionship online, which the fraudsters dubiously provided. After the fraudsters gained the trust of the victims, the fraudsters duped the victims into wiring money to various accounts, including the business account of Valur Holding LLC. Special Agent Newman has traced money from victims, who he has interviewed, into the accounts of Valur Holding LLC. Thereafter, funds are moved from the Valur Holdings account to other business accounts in, among other places, China, that suggest that the funds

identified for seizure herein may be involved in a form of trade-based money laundering.¹

6. On or about January 25, 2024, the United States Secret Service (“USSS”), in conjunction with the Plano Police Department, acting pursuant to a state Warrant (S380-240125-7PPD), seized the Defendant Property in the Eastern District of Texas. The United States Secret Service is currently holding the Funds.

7. Pursuant to Supplemental Rule G(2)(f), facts in support of a reasonable belief that the Government will be able to meet its burden of proof at trial are set forth more fully as follows and have been verified by the attached Verification of USSS Special Agent Adam Newman.

The Fraud Scheme

8. Since December 2023, the United States Secret Service (USSS), Dallas Field Office (DAL), has been investigating a criminal money laundering syndicate operating various cryptocurrency investment scams. Often the unknown scammers promote spoofed domains and websites purporting to look like legitimate platforms to U.S. based victims. Scammers then fool victims into "investing" through these fraudulent investment platforms, which instead allow the scammers to steal the victims' money. Numerous bank accounts for businesses have been

¹ “[T]rade-based money laundering is defined as the process of disguising the proceeds of crime and moving value through the use of trade transactions in an attempt to legitimize their illicit origins.” Financial Action Task Force, *Trade-Based Money Laundering* (June 23, 2006), available at <https://www.fatf-gafi.org/publications/methodsandtrends/documents/trade-basedmoneylaundering.html>.

identified as receiving funds derived either directly or indirectly from fraud victims.

9. Based on the information provided, it appears that the victims are involved in a fraudulent scheme known as "Pig Butchering." Pig Butchering is a type of romance scam, or confidence scam, that convinces victims to invest in non-existent cryptocurrency trading platforms. Romance scams target persons looking for romantic partners or friendships on dating websites and other social media platforms. The scammers may create profiles using fictitious or fake names, locations, images, and personas, allowing the scammers to cultivate relationships with prospective romance scam victims. Romance scams aim to use the fictitious relationship to obtain money or induce victims to conduct financial transaction(s) on behalf of the scammers.

10. The first such case of this investment scam was discovered through an Internet Criminal Complaint Center (IC3) report of a local resident On November 29, 2023. Throughout the investigation USSS Special Agent (SA) Adam Newman has identified multiple accounts who have received proceeds of these investment scams through additional IC3 reports and victims who stated they sent funds to multiple different bank accounts under the impression they are investing into cryptocurrency. While investigating an account which received cryptocurrency investment fraud proceeds, in the name Lingling Beauty Studio LLC, a victim provided additional information indicating that Valur Holding LLC was also

involved. Thereafter, law enforcement opened an investigation into Valur Holding LLC which has progressed in pertinent parts as follows:

Investigation of Valur Holding LLC

11. First, Special Agent Newman found information that Valur Holding LLC is based in California. Specifically, a query through the California Secretary of State website revealed that Valur Holding LLC was filed as a domestic LLC on June 6, 2019, by Wan Lan Hew. The documents available on the website listed a business address of 4941 Santa Anita Avenue, Temple City, CA. On October 10, 2023, an address change was filed. The new address was reported to be 18513 East Gale Avenue, City of Industry, CA. Additionally, the document stated the business type to be a retail store – consumer goods. On December 15, 2023, a new document was filed with the California Secretary of State listing a new manager/agent – Kenji Toumi, who is one of the listed account holders of the account which was seized.

12. Second, Special Agent Newman contacted Bank of America and was advised the account was under review for potential fraud based on a claim filed by an individual who had submitted a wire. Additionally, Bank of America reported the account appeared to be being used to funnel funds, essentially the funds were quickly transferred out of the account after they were received. Furthermore, Special Agent Newman was provided the account holder information. There are

two listed parties with access to the account, the primary Kenji Toumi and the secondary Nan Gang.

13. Third, Special Agent Newman obtained records for account XXXXXXXX3200, Valur Holding LLC, held by Bank of America. During November 2023, the account received 53 deposits amounting to \$672,732.70. These deposits consisted primarily of Wire Transfers and Online Banking Transfers which appear to be from other business accounts, primarily Kaizen Ventures. There were no wire transfers from individuals. There were six Zelle payments that appear to be from individuals, but these deposits were for less than \$100 each. A review of the \$689,158.94 in withdrawals revealed most of the funds were transferred to bank accounts held in foreign countries. However, there were a few transactions that appear to be for payroll and/or taxes which could indicate some legitimate activity. During December 2023, the account received 107 deposits amounting to \$3,310,177.60, nearly a 400% increase. These deposits consisted primarily of Wire Transfers and Online Banking Transfers. Of the 60 wires received, totaling \$3,064,339.66, seven appear to be from business accounts, the remaining are from individuals. All but two of the wires were for whole dollar amounts which is unusual for a business conducting legitimate sales. The account received 32 Zelles from individuals, all for less than \$100 each. The account conducted \$2,592,517.15 in withdrawals. Approximately \$1,891,000.00 was withdrawn via wire transfer and submitted to accounts held in foreign countries.

There were a few withdrawals that appear to be for payroll and taxes which could indicate some legitimate activity.

Interviews of Victims

14. To date, Special Agent Newman has been able to identify and telephonically interview eight individuals, who preliminary analysis suggests are victims, whose accounts have provided at least \$511,000.00 in deposits into account XXXXXXXX3200. All those interviewed stated that they were victims of fraud related to various investment schemes related to cryptocurrency and spot-gold trading.

Example of USSS Victim Interviews

15. For example, Special Agent Newman contacted S.S. (Victim 1) regarding a wire made to Lingling Beauty Studio INC. S.S. stated he thought he was investing in Coinbase and submitted wires to intermediaries to be deposited into his account. S.S. said he thought it strange that he was directed to send funds to different accounts when he made an investment. He stated his communications with Coinbase was conducted via WhatsApp. S.S. stated on December 5, 2023, he sent a wire in the amount of \$25,000.00 to JPMorgan Chase Bank account number XXXXX6716 in the name of Lingling Beauty Studio INC. S.S. believes the wires he submitted are in his Coinbase investment account. S.S. provided information on two additional wires, one submitted to Lonestar Group LLC's Bank of America account in the amount of \$22,000.00 and the other to Bank of America account

number XXXXXXXX3200 in the name of Valur Holding LLC in the amount of \$45,000.00.

16. Special Agent Newman also contacted P.A. (Victim 2) regarding a \$60,000.00 wire made to Valur Holding LLC made on December 22, 2023. P.A. stated he is a victim of a fraud scheme and had recently reported it. P.A. said he was contacted by an individual, Chris Mace, via social media. They eventually switched to communicating through WhatsApp and discussed investments. P.A. stated he was directed to what he believed was a JPMorgan Chase Bank investment group website. After significant investments he was contacted by customer service and told his account was locked due to an international task force accusing him of money laundering. P.A. stated he was asked for additional funds to prove he was not laundering money. He became suspicious and noticed the email was not a true JP Morgan Chase Bank address. P.A. stated he has suffered a loss of \$104,000.00.

17. Special Agent Newman also contacted M.H. (Victim 3) regarding a wire submitted to Valur Holding LLC. M.H. reported being contacted via social media by a woman named Libby Collins. A friendship began and they started communicating via WhatsApp. M.H. stated she got him involved with NFT bidding; this involves bidding on artwork for profit. M.H. stated this scam has cost him his entire IRA. M.H. reported conducting three wires for a total of \$161,000.00. This includes a wire to Bank of America account number

XXXXXXXXX3200 in the name of Valur Holding LLC on December 18, 2023, in the amount of \$80,000.00.

18. Special Agent Newman contacted M.S. (Victim 4) regarding a wire transaction made to Valur Holdings LLC. M.S. stated she met a man, Rosen Smith, online through a dating app. After a time, they began to communicate through WhatsApp, and he taught her about investing in crypto. M.S. stated she downloaded apps through Playstore which led to her believing it was all legit. M.S. stated she was convinced to quit her job to access her retirement funds to invest into this fraud. M.S. stated she wired \$50,000.00 to Bank of America account number XXXXXXXXX3200 in the name of Valur Holding LLC.

19. Special Agent Newman contacted B.S. (Victim 5) regarding a wire transaction made to Valur Holding LLC. Saunders stated the wire was a for 12% security deposit to a company that was assisting him in recovering funds confiscated by the Swiss government. B.S. stated he received a random text message last year that ultimately led to him investing \$263,000 into crypto. He believed his investment grew to be valued at \$875,000. When he attempted to make a withdrawal, he was unable to and was told the money had been confiscated. B.S. believed he had hired an attorney to assist him retrieve his funds. He never met this attorney and communicated via WhatsApp. This attorney was supposedly working with a group overseas to recover the funds. B.S. was directed to submit retainer fees to Royal Chronos Limited and Legendel INC, both

companies are suspects in case 337-763-5814. B.S. was later directed to wire \$85,000 to Valur Holding LLC.

20. Special Agent Newman contacted M.L. (Victim 6) regarding a \$105,000 wire transfer to Valur Holding LLC. M.L. stated he was a victim of an investment fraud involving CoinSmartEx.net. M.L. stated when he attempted to make a withdrawal, he was told he must pay a \$10,000 commission, which he did, then he was told his account was under investigation by the authorities and he needed to pay \$10,000 to settle the matter. M.L. stated he paid the investigation fee and was again asked to pay another \$10,000 fee. M.L. stated he knew he was being scammed and filed a complaint on SCAMAdvisor.com. He said there are numerous complaints filed about CoinSmartEx.net on the site. M.L. stated when submitting his funds to CoinSmartEX he was given various bank accounts and told to submit the funds within a two-hour window.

21. Special Agent Newman contacted D.B. (Victim 7) regarding a \$75,000 wire transfer to Valur Holding LLC. D.B. stated he received a random text message on his phone from a woman he knows as Amiee Taylor. He believes she is originally from Moscow but lives in Los Angeles, CA. Their communications quickly moved to WhatsApp and investment opportunities into spot-gold trading. D.B. stated Amiee walked him through making trades and provided him “inside leads” from her finance guru uncle. D.B. stated he made several deposits into his investment account. D.B. stated he was provided multiple business accounts to

transfer his funds to and was told the accounts were only good for 2-4 hours. D.B. stated it was strange they were always rushing him. D.B. stated when he attempted to make a withdrawal, he was asked what he was doing and told he would need to make a new deposit first. D.B. provided additional information regarding a \$42,000.00 deposit to JPMorgan Chase account held by Qishen Trading Limited. The Qishen Trading Limited account was seized on or about January 4, 2024, by the United States Secret Service pursuant to a freeze letter. A federal Seizure Warrant (Northern District of Texas Case 1:24-mj-14-BU) was completed on March 27, 2024.

CONCLUSION

22. By virtue of the foregoing and pursuant to 18 U.S.C. § 981(f), all right, title, and interest in the Funds vested in the United States at the time of the commission of the unlawful act giving rise to forfeiture and has become and is forfeitable to the United States.

WHEREFORE, the United States of America respectfully prays the Court that:

23. Due notice be given to all parties to appear and show cause why the forfeiture should not be decreed;

24. Judgment be entered declaring the Funds to be condemned and forfeited to the United States of America for disposition according to law; and

25. The United States be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action, including but not limited to the expenses of maintenance and protection of the Defendant Property as required by 28 U.S.C. § 1921.

27. Previously listed victims may go through the remission process to pursue recovery of funds.

POTENTIAL CLAIMANTS

26. Potential claimants to the Defendant Property may include:

Valur Holdings LLC – Kenji Toumi – 18513 East Gale Avenue, City of Industry, CA 91748.

Respectfully submitted, this the 20th day of June, 2024.

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/ Kevin McClendon

KEVIN MCCLENDON
Assistant United States Attorney
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Texas Bar No.
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Fax: (972) 509-1209
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ATTORNEYS FOR PLAINTIFF

VERIFICATION

I, Adam Newman, hereby state that:

1. I am a Special Agent with the United States Secret Service.
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.

Executed on 18 day of June, 2024.

A handwritten signature in black ink, appearing to read "Adam E. Newman", written over a horizontal line.

Adam Newman
USSS Special Agent

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

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	No. 4:24-cv-00563
	§	
Approximately \$499,999.00 in Funds	§	
Seized from Bank of America Account	§	
XXXXXXXX3200, such account held	§	
in the name of Valur Holding LLC	§	
Defendant.	§	

ORDER FOR WARRANT OF ARREST IN REM

TO: The Clerk of the Court, United States District Court for the Eastern District of Texas

WHEREAS, on June 20, 2024, the United States of America filed a verified complaint for civil forfeiture in the United States District Court for the Eastern District of Texas against the defendant property, alleging that the property is subject to seizure and civil forfeiture to the United States for the reasons alleged in the complaint; and

WHEREAS, the Court, having reviewed the Complaint and the Government's Application for Warrant of Arrest in Rem, finds, the defendant property is currently in the possession, custody, or control of the United States; and

WHEREAS, Supplemental Rule G(3)(b)(i) provides that the clerk must issue a warrant to arrest the property if it is in the government's possession, custody, or control;

YOU ARE, THEREFORE, HEREBY COMMANDED to issue an arrest warrant in rem for the defendant property pursuant to Supplemental Rule G(3)(b)(i); and

YOU ARE FURTHER COMMANDED to deliver the arrest warrant in rem to a person or organization authorized to execute it who may be a marshal or any other United States officer or employee, someone under contract with the United States, or someone specially appointed by the Court for that purpose, pursuant to Supplemental Rule G(3)(c)(i).

IT IS SO ORDERED,

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

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	No. 4:24-cv-00563
	§	
Approximately \$499,999.00 in Funds	§	
Seized from Bank of America Account	§	
XXXXXXXXXX3200, such account held	§	
in the name of Valur Holding LLC	§	
Defendant.	§	

WARRANT OF ARREST IN REM

TO: The United States Secret Service for the Eastern District of Texas and/or any other United States officer or employee, someone under contract with the United States, or someone specially appointed by the court.

On June 20, 2024, the United States filed a verified complaint for civil forfeiture in the United States District Court for the Eastern District of Texas against \$499,999.00 in funds seized from Bank of America Account XXXXXXXXXXX3200, such account held in the name of Valur Holding LLC; such account held by or for the benefit of, or in the names of Nan Gang and Kenji Toumi (hereinafter “defendant property”), alleging that the property is subject to seizure and forfeiture to the United States for the reasons alleged in the complaint.

The defendant property is currently in the possession, custody, or control of the United States.

In these circumstances, Supplemental Rule G(3)(b)(i) directs the Clerk of the Court to issue an arrest warrant in rem for the defendant property.

Supplemental Rule G(3)(c)(i) provides that the warrant of arrest in rem must be delivered to a person or organization authorized to execute it who may be a marshal or any other United States officer or employee, someone under contract with the United States, or someone specially appointed by the court for that purpose.

YOU ARE COMMANDED to do the following:

1. To arrest the defendant property as soon as practicable by serving a copy of this warrant on the custodian in whose possession, custody or control the property is presently found, and to use whatever means may be appropriate to protect and maintain it in your custody until further order of this Court.

2. Promptly after execution of this process, to file the same in this Court with your return thereon, identifying the individual(s) upon whom copies were served and the manner employed.

Dated:

DAVID O'TOOLE
Clerk of the Court
United States District Court for the
Eastern District of Texas

By: _____
Deputy Clerk

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Kevin McClendon, USAO, 101 E. Park Blvd., Suite 500
Plano, Texas 75074 (972) 509-1201

DEFENDANTS

Approximately \$499,999.00 in Funds Seized from Bank of America
Account XXXXXXXX3200, such account held in the name of

County of Residence of First Listed Defendant Collin County
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input checked="" type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify) _____
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

This is an in rem civil forfeiture proceeding pursuant to 18 USC 981

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 06/20/2024 SIGNATURE OF ATTORNEY OF RECORD

/s/ Kevin McClendon

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____