UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, Plaintiff v. $1,413,037.85 SEIZED ON OR ABOUT JULY 15, 2024, FROM INTERACTIVE BROKERS LLC ACCOUNT NUMBER XXXX6026, HELD IN THE NAME OF ZHI GE, Defendant *in Rem*.	))))))))))))	No. 26-CV-13513

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by its attorney, Leah Foley, United States Attorney for the District of Massachusetts, in a civil action of forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and Supplemental Rule G of the Federal Rules of Civil Procedure for Admiralty or Maritime Claims and Asset Forfeiture Actions, alleges that:

NATURE OF ACTION

1. This action is brought by the United States pursuant to 18 U.S.C. § 981(a)(1)(C), seeking civil forfeiture of the following funds:

   a. $1,413,037.85 seized on or about July 15, 2024, from Interactive Brokers LLC (“Interactive Brokers”) account number XXXX6026, held in the name of ZHI GE

(the “Defendant Funds”).

BACKGROUND ON THE INVESTIGATION

2. On April 22, 2024, a criminal complaint was filed alleging that ZHI GE (“GE”) and EAMMA SAFI (“SAFI”) engaged in conspiracy to commit securities fraud, securities fraud, conspiracy to commit money laundering, and money laundering. *See United States v. Khouadja*

et al., 24-CR-10200-RGS (D. Mass.), Doc. No. 1. Based on that criminal complaint, an arrest warrant for GE was issued that same day. *Id.*, Doc. No. 4.

3. GE was taken into custody in Singapore on or about July 3, 2024, pursuant to a provisional arrest warrant, and remains there as of the date of the filing of this complaint.

4. The Defendant Funds were seized pursuant to a seizure warrant issued in the District of Massachusetts on July 12, 2024. Until the Defendant Funds were transferred to the custody of the United States, interest continued to accrue. The total amount of Defendant Funds transferred to government custody was $1,413,037.85.

5. On November 4, 2025, a federal grand jury sitting in Boston, Massachusetts returned a six-count Superseding Indictment charging GE, SAFI, and others with Conspiracy to Commit Securities Fraud in violation of 18 U.S.C. §§ 1349 and 371 (Counts One and Two); Securities Fraud, Aiding and Abetting in violation of 18 U.S.C. §§ 1348 and 2 and 15 U.S.C. §§ 78j(b) and 78ff(a); 17 C.F.R. § 240.10b-5, and 18 U.S.C. § 2 (Counts Three and Four); Money Laundering Conspiracy in violation of 18 U.S.C. § 1956(h) (Count Five); and Money Laundering, Aiding and Abetting in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i)(2) and 2 (Count Six). *United States v. Khouadja et al.*, 24-cr-10200-RGS (Doc. No. 43). The Superseding Indictment also contained a forfeiture allegation relating to Counts One through Four pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) and a forfeiture allegation relating to Counts Five and Six pursuant to 18 U.S.C. § 982(a)(1). A copy of the Superseding Indictment is attached hereto at Exhibit 1 and the allegations contained in the Superseding Indictment are incorporated by reference herein.

JURISDICTION AND VENUE

6. 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, and pursuant to 18 U.S.C. § 981(h), because GE is subject to criminal prosecution that is the basis for forfeiture of the Defendant Funds in the District of Massachusetts.

STATUTORY AUTHORITY

7. Pursuant to 18 U.S.C. § 981(a)(1)(C), the following property is subject to civil forfeiture to the United States:

> Any property, real or personal, which constitutes or is derived from proceeds traceable to…any offense constituting a 'specified unlawful activity' (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

8. Pursuant to 18 U.S.C. § 1961(1), as incorporated by 18 U.S.C. §§ 1956(c)(7)(A) and 981(a)(1)(C), securities fraud is a specified unlawful activity.

FACTUAL ALLEGATIONS

9. As a federal Grand Jury found in issuing the Superseding Indictment, probable cause exists that from at least in or about November 2016 and continuing in or about February 2024, GE conspired with his co-defendants, and others known and unknown, to engage in an insider trading scheme by obtaining material non-public information ("MNPI") about the financial performance and merger-and-acquisition activity of various publicly traded companies, executing securities trades while in possession of that MNPI, and providing that MNPI, in exchange for a percentage of trading profits, to others known and unknown, who traded while in possession of the MNPI. *See* Superseding Indictment, ¶ 45.

10. The object of the conspiracies was to commit securities fraud by trading in the securities of various companies while in possession of and on the basis of MNPI about those companies. *Id.* ¶ 46. The principal purposes of the conspiracies were to make money and conceal the conspirators' actions from others, including regulators and law enforcement. *Id.*

11. GE was recruited into the insider trading scheme in 2016, and in turn recruited additional traders and began providing them with MNPI. *See* Superseding Indictment, ¶¶ 49, 52-70.

12. MorphoSys A.G. ("MorphoSys") was a biotechnology company that, at relevant times, had a U.S. wholly-owned subsidiary MorphoSys US Inc., which was headquartered in Boston, Massachusetts. *Id.* ¶ 37. At relevant times, MorphoSys traded on the NASDAQ Stock Market ("NASDAQ") under the ticker symbol MOR. *Id.*

13. On or about January 28, 2020, GE opened account number XXXX6026 at Interactive Brokers ("Interactive Brokers Account"). In opening the Interactive Brokers Account, GE used his own name, his date of birth, a bank account in his name, and a copy of his passport.

14. Interactive Brokers is headquartered in Greenwich, Connecticut. Interactive Brokers is a member of the New York Stock Exchange and the Financial Industry Regulatory Authority ("FINRA"), and it is regulated by the U.S. Securities and Exchange Commission and the U.S. Commodity Futures Trading Commission.

15. As set forth below and as charged in the Superseding Indictment, in violation of federal securities laws, GE used the Interactive Brokers Account in February 2024 to sell 1,450 MorphoSys call option contracts, earning a profit of approximately $3.5 million, some of which remained in the Interactive Brokers Account until it was seized. *See also* Superseding Indictment, ¶¶ 224-226.

16. On or about January 16, 2024, GE began to purchase short-term MorphoSys call options in the Interactive Brokers Account, with an expiration date of February 16, 2024, while in the possession of MNPI that the company would be acquired. Specifically, on or about January

16, 2024, GE purchased 1,452 MorphoSys call options in the Interactive Brokers Account.[1] On or about the same day, three additional co-conspirators, including CHEUK YUE LEE ("LEE") and JULIEN LIU, who are also charged in the Superseding Indictment, also purchased MorphoSys call options.

17. On or about January 26, 2024, the industry news websites *Seeking Alpha* and *Betaville* released reports indicating that MorphoSys had hired investment banking advisers after receiving acquisition interest from several large pharmaceutical companies.

18. On or about January 30, 2024, co-conspirator LEE, purchased additional shares of MorphoSys.

19. On or about February 5, 2024, Reuters reported that Novartis was in advanced talks to acquire MorphoSys. On that news, MorphoSys shares increased more than 40 percent.

20. On or about February 5, 2024, Novartis announced that it had agreed to acquire MorphoSys for approximately \$2.9 billion. On or about the following day, according to information from Interactive Brokers, GE sold 1,450 MorphoSys call option contracts in the Interactive Brokers Account, earning a profit of approximately \$3,500,000—or approximately 1,824 percent—on his three-week investment.

21. The Defendant Funds are traceable to some of GE's proceeds from securities fraud and conspiracy to commit securities fraud in connection with the purchase and sale of MorphoSys securities. Accordingly, based on the facts set forth above and those set forth in the Superseding Indictment attached as Exhibit 1, the Defendant Funds are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) as proceeds traceable to securities fraud and/or conspiracy to commit securities fraud.

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[1] In addition to the sale of 1,450 call options referenced in paragraph 15, one call option was sold on January 19, 2024, and another was sold on January 22, 2024.

CLAIM FOR FORFEITURE
(18 U.S.C. § 981(a)(1)(C))

22. The allegations contained in paragraphs 1 to 21 are incorporated herein.

23. As set forth above, the Defendant Funds are property, real or personal, which constitutes or is derived from proceeds traceable to an offense constituting a "specified unlawful activity", or a conspiracy to commit such offense, specifically securities fraud.

24. Accordingly, the Defendant Funds are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, the United States of America requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshal for the District of Massachusetts, or his designee, commanding seizure of the Defendant Funds, 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 Funds;

3. That thereafter, the Defendant Funds be disposed of according to law; and

4. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By: /s/ *Matthew M. Lyons*
MATTHEW M. LYONS
Assistant United States Attorney
U.S. Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100
matthew.lyons@usdoj.gov

Dated: August 3, 2026

Verification

I, Ryan Lane, hereby verify and declare, under penalty of perjury, that I am a Special Agent for the Federal Bureau of Investigation and, pursuant to 28 U.S.C. § 1746, that I have read the foregoing Verified Complaint for Forfeiture *in Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to the best of my knowledge, information, and belief.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, and my investigation of this case together with other law enforcement officers.

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

Executed this 3 day of AUG, 2026.

Ryan Lane
Special Agent
Federal Bureau of Investigation