UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, Plaintiff v. APPROXIMATELY 110,270 USDT SEIZED FROM BINANCE ACCOUNT UID 735653443 HELD IN THE NAME OF ENRIQUE MORA MORALES, Defendants *in Rem.*	)	Civil Action No.:

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by its attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, in a civil action for 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:

1. 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, namely one of the victims is located in the District of Massachusetts.

2. The Defendant Property consists of the following:

   a. Approximately 110,270 USDT[1] seized from Binance Account UID 735653443 ("Binance Account 1") held in the name of Enrique Mora Morales

3. As detailed in the Affidavit of Connor Jorde, Special Agent with the Federal Bureau of Investigation, attached hereto as Exhibit A and incorporated herein by reference, the United

[1] USDT, also known as Tether, is a stablecoin. Each USDT token is worth approximately $1.00 U.S. Dollar and claimed to be backed by $1.00 USD in physical reserves.

States has probable cause to believe that the Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) because it represents property, real or personal, which constitutes or is derived from proceeds traceable to a violation of a specified unlawful activity, or conspiracy to commit a specified unlawful activity, specifically violations of 18 U.S.C. § 1343 (wire fraud).

4. On or about August 3, 2026, Nest Exchange Limited, d/b/a Binance transferred approximately 110,270 USDT associated with Binance Account 1 to a government-controlled wallet.

WHEREFORE, the United States of America respectfully requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshals Service, commanding it to retain custody of the Defendant Property and to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;

2. That judgement of forfeiture be decreed against the Defendant Property;

3. That thereafter, the Defendant Property 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/ Carol E. Head*
CAROL E. HEAD
Assistant United States Attorney
United States Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
[redacted]

Dated: September 28, 2026

Verification

I, Connor Jorde, Special Agent for the Federal Bureau of Investigation state that I have read the foregoing Verified Complaint for Forfeiture *in Rem*, and the Affidavit, attached as Exhibit A, and declare under penalty of perjury that the contents thereof are true to the best of my knowledge, information, and belief.

Connor Jorde
Special Agent
Federal Bureau of Investigation

Dated: September 28, 2026

EXHIBIT A

AFFIDAVIT OF SPECIAL AGENT CONNOR JORDE IN SUPPORT OF CIVIL FORFEITURE COMPLAINT

I, Connor Jorde, declare and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") since approximately September 2015. I attended the FBI Academy, where I received training on federal criminal violations and investigation techniques. I have since been assigned to the FBI's Boston Field Office, where I have worked on the Health Care Fraud and Counter-Terrorism squads. I am currently assigned to FBI Boston's Economic Crimes squad, where my duties involve the investigation of mail, wire, and bank fraud and money laundering, among other federal criminal offenses.

PURPOSE OF AFFIDAVIT

2. This affidavit is submitted in support of the Verified Complaint for Forfeiture *in Rem* against the following property:

   a. Approximately 110,270 USDT[1] seized from Binance Account UID 735653443 held in the name of Enrique Mora Morales ("Binance Account 1") (the "Defendant Property").

3. In July 2023, the FBI began investigating a cryptocurrency account takeover fraud scheme that targeted a Massachusetts family trust (the "Trust") and one of the trust's beneficiaries ("Individual 1") (collectively, the "victims"). As described below, proceeds of the account takeover fraud were traced to Binance Account 1.

4. Binance voluntarily froze Binance Account 1 at the request of the FBI. At the time of the voluntary freeze request, Binance Account 1 held approximately 758.552688 XMR.[2]

[1] USDT, also known as Tether, is a stablecoin. Each USDT token is worth approximately $1.00 U.S. Dollar and claimed to be backed by $1.00 USD in physical reserves.

[2] XMR, also known as Monero, is a type of cryptocurrency called a privacy coin.

On October 30, 2024, the United States obtained a seizure warrant for all funds and things of value held in or associated with Binance Account 1.

5. On or about August 3, 2026, Binance transferred approximately 110,270 USDT, in lieu of the XMR, from Binance Account 1 to a government-controlled wallet.

6. The facts set forth in this affidavit are based upon my personal observations, my training and experience, information obtained from witnesses and cryptocurrency exchanges, other federal investigative personnel, and my review of other records. This affidavit is intended to show that there is probable cause for the forfeiture of the Defendant Properties and does not purport to set forth all my knowledge of, or investigation, into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

FORFEITURE AUTHORITY

7. Pursuant to 18 U.S.C. § 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of any specified unlawful activity, is subject to forfeiture to the United States. Pursuant to 18 U.S.C. § 1961(1), as incorporated by 18 U.S.C. §§ 1956(c)(7)(A) and 981(a)(1)(C), wire fraud, 18 U.S.C. § 1343, is specified unlawful activity.

8. 18 U.S.C. § 1343 makes it a crime for anyone, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, to transmit or cause to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice.

BACKGROUND ON CRYPTOCURRENCY

9. Cryptocurrency, a type of virtual currency, is a decentralized, peer-to-peer, network-based medium of value or exchange that may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies. Examples of cryptocurrencies are Bitcoin, Litecoin, Monero, and Ethereum. Cryptocurrency can exist digitally on the Internet, in an electronic storage device, or in cloud-based servers. Although not usually stored in any physical form, public and private keys (described below) used to transfer cryptocurrency from one person or place to another can be printed or written on a piece of paper or other tangible object. Cryptocurrency can be exchanged directly person to person, through a cryptocurrency exchange, or through other intermediaries. Generally, cryptocurrency is not issued by any government, bank, or company; it is instead generated and controlled through computer software operating on a decentralized peer-to-peer network. Most cryptocurrencies have a "blockchain," which is a distributed public ledger, run by the decentralized network, containing an immutable and historical record of every transaction.[3] Cryptocurrency is not illegal in the United States.

10. Bitcoin[4] is a type of cryptocurrency. Payments or transfers of value made with bitcoin are recorded in the Bitcoin blockchain and thus are not maintained by any single administrator or entity. As mentioned above, individuals can acquire bitcoin through exchanges (*i.e.*, online companies which allow individuals to purchase or sell cryptocurrencies in exchange

[3] Some cryptocurrencies operate on blockchains that are not public and operate in such a way to obfuscate transactions, making it difficult to trace or attribute transactions.

[4] Since Bitcoin is both a cryptocurrency and a protocol, capitalization differs. Accepted practice is to use "Bitcoin" (singular with an uppercase letter B) to label the protocol, software, and community, and "bitcoin" (with a lowercase letter b) to label units of the cryptocurrency. That practice is adopted here.

for fiat currencies or other cryptocurrencies), bitcoin ATMs, or directly from other people. Individuals can also acquire cryptocurrencies by "mining." Individuals can send and receive cryptocurrencies online using many types of electronic devices, including laptop computers and smart phones. Even though the public addresses of those engaging in cryptocurrency transactions are recorded on a blockchain, the identities of the individuals or entities behind the public addresses are not recorded on these public ledgers. If, however, an individual or entity is linked to a public address, it may be possible to determine what transactions were conducted by that individual or entity. Bitcoin transactions are therefore sometimes described as "pseudonymous," meaning that they are partially anonymous. And while it is not completely anonymous, bitcoin allows users to transfer funds more anonymously than would be possible through traditional banking and financial systems.

11. Monero (XMR) is a type of anonymity-enhanced cryptocurrency, also called a privacy coin, that shields sending and receiving addresses, as well as transacted amounts. It does not maintain a public ledger. Instead, every Monero transaction obfuscates sending and receiving addresses and transacted amounts by default. Therefore, it inherently obfuscates the source and destination of funds. Monero has been delisted by many cryptocurrency exchanges due to increasing regulatory pressure and anti-money laundering compliance requirement.

12. Stablecoins are a type of virtual currency whose value is pegged to a commodity's price, such as gold, or to a fiat currency, such as the U.S. dollar, or to a different virtual currency. Stablecoins achieve their price stability via collateralization (backing) or through algorithmic mechanisms of buying and selling the reference asset or its derivatives. USDT (Tether) is a type of stablecoin pegged to the U.S. dollar.

13. Cryptocurrency is stored in a virtual account called a wallet. Wallets are software programs that interface with blockchains and generate and/or store public and private keys used to send and receive cryptocurrency. A public key or address is akin to a bank account number, and a private key is akin to a PIN number or password that allows a user the ability to access and transfer value associated with the public address or key. To conduct transactions on a blockchain, an individual must use the public address (or "public key") and the private address (or "private key").

14. Although cryptocurrencies such as bitcoin have legitimate uses, cryptocurrency is also used by individuals and organizations for criminal purposes, including money laundering, and is an oft used means of payment for illegal goods and services on hidden services websites operating on the Tor network.

15. Exchangers and users of cryptocurrencies store and transact their cryptocurrency in a number of ways, as wallet software can be housed in a variety of forms, including on a tangible, external device ("hardware wallet"), downloaded on a PC or laptop ("desktop wallet"), with an Internet-based cloud storage provider ("online wallet"), as a mobile application on a smartphone or tablet ("mobile wallet"), printed public and private keys ("paper wallet"), and as an online account associated with a cryptocurrency exchange. Because these desktop, mobile, and online wallets are electronic in nature, they are located on mobile devices (*e.g.*, smart phones or tablets) or at websites that users can access via a computer, smart phone, or any device that can search the Internet.

16. Bitcoin "exchangers" and "exchanges" are individuals or companies that exchange bitcoin for other currencies, including U.S. dollars. 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.[5] Such exchanges and exchangers are required to register with FinCEN and have proper state licenses (if required under applicable state law). From my training and experience, I know that registered money transmitters are required by law to follow Bank Secrecy Act ("BSA") anti-money laundering ("AML") regulations, "Know Your Customer" ("KYC") protocols, and other verification procedures similar to those employed by traditional financial institutions. For example, FinCEN registered cryptocurrency exchangers often require customers who want to open or maintain accounts on their exchange to provide their name, address, phone number, and the full bank account and routing numbers that the customer links to an exchange account.

17. Nest Exchange Limited, d/b/a Binance, is a cryptocurrency exchange and custodian that allows users to buy, sell, and store digital assets. Binance holds a Money Services Business Registration in the United States. Binance's registration shows an address of Binance c/o Nest Exchange Limited, Addax Tower, Office 4606, Al Reem Island, Abu Dhabi, UAE.

PROBABLE CAUSE

18. In June 2023, an individual ("Individual-1") who resides in San Diego, California and the Victim Trust, which was created in and under the laws of Massachusetts and is located in Boston, Massachusetts, were victims of an email fraud scheme.

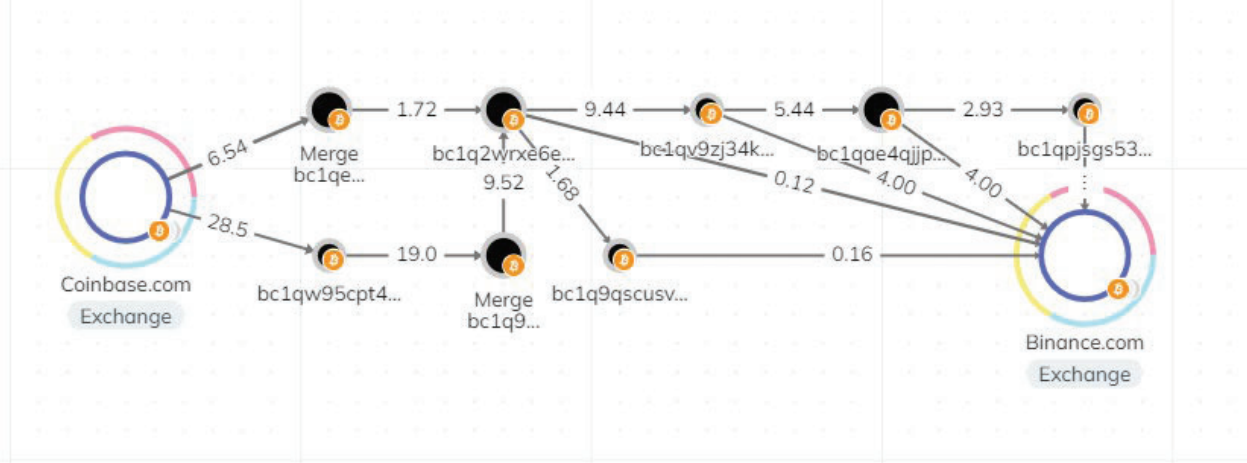
19. In or around June 2023, Individual-1 corresponded via email with Coinbase, a legitimate cryptocurrency exchange. Individual-1 and the Trust each had separate

[5] *See* "Application of FinCEN's Regulations to Person Administering, Exchanging, or Using Virtual Currencies," available at https://www.fincen.gov/resources/statutes-regulations/administrative-rulings/application-fincens-regulations-virtual#:~:text=The%20guidance%20makes%20clear%20that,for%20any%20reason%20(including%20when.

cryptocurrency wallets associated with a single Coinbase account, held by Individual 1. Individual 1 contacted Coinbase about the need to create a separate Coinbase account for the Trust. On June 1 and June 2, 2023, Individual-1 received text messages purportedly from "Coinbase," which induced Individual-1 to share the login, password, and other details to access both Individual 1's Coinbase wallet and the victim Trust's Coinbase wallet. At the time, the wallets, combined, contained 33.7 BTC, valued then at approximately $900,000 (US). Of that amount, the Victim Trust Coinbase wallet had 28.5 BTC. After Individual-1 shared that login, password and other details, 33.7 BTC was transferred from both Coinbase wallets, without their knowledge or consent, to several different cryptocurrency wallets.

20. Utilizing forensic tracing techniques, law enforcement was able to trace 11.2 BTC of the stolen 33.7 BTC to Binance Account 1. The transfers occurred in a number of separate transactions between June 5, 2023 and June 15, 2023. The amounts and transaction hashes for each transaction are listed below, and the diagram shows the movement of a portion of the victims' funds to Binance Account 1:

BTC Amount	Hash
0.038838	ba401d3e6323ead33ba74784a83a38ba754bca9ba9d99275afc90743d3d897e3
0.077589	6df10750f95c0538d481dbeae1c24c5d94668c097b03e55bd3afbd368162a1aa
0.155304	db9b64b098a57cae6701c3029db725cab9e5484522a31873209b14ef237a4fd6
4.000000	69772dacda28c634e70eba4e102064aceace26c7ebc9d20cae387fc3558994a5
4.000000	983db24678ad7355c2019ea651fe6a0de9d4c86b784e0ef667262f942d321c51
2.931831	75f437c27ffcb0a2d2c212f51956ce9a823e74667417deb771e890ba8277ec40



21. I have reviewed records for Binance Account 1, including KYC records. Binance Account 1 was opened on or about May 25, 2023 through Binance Spain S.L., a virtual asset service provider, which is registered in Spain and a subsidiary of Binance.

22. Binance Account 1 purportedly belongs to a Spanish National named Enrique Mora Morales ("Morales"), however, according to Spanish authorities, the identification number on the national identification document provided to Binance is unassigned and is therefore fraudulent. Binance records also show that approximately 15 devices are listed as "Approved Devices" and accessed Binance Account 1 between May 2023 and November 2023.

23. Based on my training and experience, the fraudulent identification used to open Binance Account 1, the large number of devices used to access Binance Account 1, and the account activity described below, I believe that Binance Account 1 is an account that was established to receive criminal proceeds.

24. Although Binance Account 1 had login activity from May 2023 to November 2023, all of the transfers/deposits into Binance Account 1 occurred between June 5, 2023 and June 15, 2023. The majority (six out of nine) of these deposits/transfers involved the victims' BTC. Binance Account 1 had no deposits after June 15, 2023.

25. Almost immediately after the victims' BTC was deposited into Binance Account 1, the BTC was converted to the privacy coin, XMR, and transferred to a new wallet.

26. The following table depicts the "Withdrawal History" or transfers from Binance Account 1, which are all in XMR. The most recent withdrawal attempt is shown first:

User ID	Currency	Amount	Destination Address	Apply Time	Status
735653443	XMR	758.55258800	ending-q4iLcQv21RA9Hv	2023-06-16 16:02:07	Rejected
735653443	XMR	758.55258800	ending-q4iLcQv21RA9Hv	2023-06-15 20:32:06	Rejected
735653443	XMR	36.09776600	ending-q4iLcQv21RA9Hv	2023-06-10 20:41:20	Success
735653443	XMR	121.01576300	ending-q4iLcQv21RA9Hv	2023-06-10 20:20:39	Success
735653443	XMR	543.30205400	ending-q4iLcQv21RA9Hv	2023-06-10 03:23:20	Success
735653443	XMR	740.40675200	ending-q4iLcQv21RA9Hv	2023-06-10 02:45:24	Success
735653443	XMR	740.96419400	ending-q4iLcQv21RA9Hv	2023-06-10 02:08:18	Success
735653443	XMR	28.42045100	ending-q4iLcQv21RA9Hv	2023-06-08 13:52:20	Success
735653443	XMR	28.42045100	ending-q4iLcQv21RA9Hv	2023-06-06 00:52:54	Rejected
735653443	XMR	14.14124702	ending-q4iLcQv21RA9Hv	2023-06-06 00:22:26	Success
735653443	XMR	7.05281097	ending-q4iLcQv21RA9Hv	2023-06-05 23:43:09	Success

27. As shown in the table above, approximately 75% of the converted XMR was successfully transferred out of Binance Account 1. On or about June 15 and June 16, 2023, a user of Binance Account 1 attempted to withdraw the remaining 758.55258800 XMR, but these transactions were rejected. Within the records provided by Binance, there is a video that matches the photo of Morales. The video shows the Morales individual demonstrating their control of Binance Account 1 in an attempt to unfreeze it. Through facial recognition tools and open-source social media research, I was able to locate an individual that matches the Morales individual that resides in Kazakhstan; however, I was unable to show additional connections to Binance Account 1 from other records obtained in the investigation.

28. I have reviewed the Binance records and there is no reason provided for the rejection; it simply gives the status as "rejected." Since all of the destination addresses for the XMR are the same and the individual in the video matches the fraudulent ID card, I believe that the same user was attempting to transfer the XMR out of Binance Account 1. Following the June 2023 activity, there were no further withdrawals from Binance Account 1. On or about November 29, 2023, was the last time Binance Account 1 had a successful login.

CONCLUSION

29. Based on the information described above, there is probable cause to believe that the Defendant Property is traceable to proceeds of a violation of 18 U.S.C. § 1343 (wire fraud) and is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

Pursuant to 28 U.S.C. § 1746, I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 28th day of September, 2026.

Connor Jorde
Special Agent
Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, Plaintiff v. APPROXIMATELY 110,270 USDT SEIZED FROM BINANCE ACCOUNT UID 735653443 HELD IN THE NAME OF ENRIQUE MORA MORALES, Defendant *in Rem.*	)	Civil Action No.:

WARRANT AND MONITION

To: The United States Marshal Service or designee

You Are Hereby Commanded to give notice to all persons concerned that a Verified Complaint for Forfeiture *in Rem* (the "Complaint"), a copy of which is attached hereto, has been filed by the United States of America against the following defendant property, described as:

a. Approximately 110,270 USDT seized from Binance Account UID 735653443 held in the name of Enrique Mora Morales (the "Defendant Property").

This Court has found probable cause for forfeiture of the Defendant Property. Accordingly, you are hereby directed to serve, and give notice of the Complaint by:

(1) Publishing notice of the United States' intent to forfeit the Defendant Property via the government website, www.forfeiture.gov, for thirty (30) consecutive calendar days; and

(2) Serving a copy of this this Warrant and Monition, together with a copy of the Complaint, to any person who reasonably appears to be a potential claimant on the facts known to the government before the end of time for filing a claim in accordance with Rule G(4)(b)(iii) of the Supplemental Rules of Rules for Admiralty or Maritime and Asset Forfeiture Claims. Service may be made by certified mail, postage prepaid and return receipt requested, by hand, or by any other reasonable means, such as electronic service.

You Are Further Commanded to arrest, attach, inspect, and retain the Defendant Property in your custody until further order of this Court.

You Are Further Commanded to give due notice by appropriate service of process, as provided herein, to all persons who claim an interest of the Defendant Property, or assert that the Defendant Property should not be condemned or disposed of pursuant to the prayer of the Complaint. Upon execution of this process, you are directed further to file the execution in this Court with your return thereon.

ALL CLAIMS TO THE DEFENDANT PROPERTY MUST BE FILED WITH THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS AND SERVED UPON ASSISTANT UNITED STATES ATTORNEY CAROL E. HEAD, UNITED STATES ATTORNEY'S OFFICE, ASSET RECOVERY UNIT, 1 COURTHOUSE WAY, SUITE 9200, BOSTON, MASSACHUSETTS 02210, WITHIN SIXTY (60) DAYS AFTER THE FIRST DAY OF PUBLICATION ON THE OFFICIAL GOVERNMENT FORFEITURE WEBSITE OR WITHIN THIRTY-FIVE (35) DAYS AFTER RECEIPT OF ACTUAL NOTICE, WHICHEVER IS EARLIER. ALL ANSWERS TO THE COMPLAINT MUST BE FILED WITH THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS AND SERVED UPON ASSISTANT UNITED STATES ATTORNEY CAROL E. HEAD, UNITED STATES ATTORNEY'S OFFICE, ASSET RECOVERY UNIT, 1 COURTHOUSE WAY, SUITE 9200, BOSTON, MASSACHUSETTS 02210, WITHIN TWENTY-ONE (21) DAYS AFTER THE FILING OF THE CLAIM. CLAIMS MUST BE FILED IN ACCORDANCE WITH THE FEDERAL RULES OF CIVIL PROCEDURE, SUPPLEMENTAL RULES FOR ADMIRALTY OR MARITIME AND ASSET FORFEITURE CLAIMS.

THE PROCEDURES FOR FILING A PETITION FOR REMISSION OR MITIGATION ARE SET FORTH IN 28 CODE OF FEDERAL REGULATIONS, PART 9. IN ADDITION TO

THE PROCEDURES MANDATED BY THOSE REGULATIONS, A COPY OF ANY PETITION FOR REMISSION OR MITIGATION SHOULD BE ADDRESSED TO THE ATTORNEY GENERAL; SHALL BE SWORN TO BY THE PETITIONER, OR BY THE PETITIONER'S ATTORNEY UPON INFORMATION AND BELIEF, SUPPORTED BY THE CLIENT'S SWORN NOTICE OF REPRESENTATION PURSUANT TO 28 U.S.C. § 1746, AS SET FORTH IN 28 C.F.R. § 9.9(g); AND SHOULD BE SUBMITTED TO THE ATTENTION OF ASSISTANT UNITED STATES ATTORNEY CAROL E. HEAD, UNITED STATES ATTORNEY'S OFFICE, ASSET RECOVERY UNIT, 1 COURTHOUSE WAY, SUITE 9200, BOSTON, MASSACHUSETTS 02210.

Robert M. Farrell, Clerk'
U.S. District Court

By: _____
Deputy Clerk

Date: _____, 2026

APPROVED AND SO ORDERED:

_____
United States District Judge

Date: _____, 2026

JS 44 (Rev. 12/12)

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 NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

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

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
CAROL E. HEAD, Assistant U.S. Attorney, U.S. Attorney's Office
1 Courthouse Way, Suite 9200, Boston, MA 02210
[redacted]

DEFENDANTS

APPROXIMATELY 110,270 USDT SEIZED FROM BINANCE ACCOUNT UID 735653443 HELD IN THE NAME OF ENRIQUE MORA MORALES

County of Residence of First Listed Defendant N/A
(IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys *(If Known)*

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

- ☒ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 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)*
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

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

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
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CIVIL RIGHTS
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- ☐ 442 Employment
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Habeas Corpus:
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- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

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- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☒ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
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- ☐ 422 Appeal 28 USC 158
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PROPERTY RIGHTS
- ☐ 820 Copyrights
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- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
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- ☐ 865 RSI (405(g))

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- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
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- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
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- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 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

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:
18 U.S.C. § 981(a)(1)(C)

Brief description of cause:
Property, real or personal, constituting or derived from proceeds traceable to "specified unlawful activity"

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND $

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE
09/28/2026

SIGNATURE OF ATTORNEY OF RECORD
/s/ Carol E. Head

FOR OFFICE USE ONLY

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

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

1. **Title of case (name of first party on each side only)** United States v. 110,270 USDT SEIZED FROM BINANCE ACCOUNT UID 735653443 HELD IN THE NAME OF ENRIQUE MORA MORALES

2. **Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).**

☐ I. **160, 400, 410, 441, 535, 830*, 835*, 850, 891, 893, R.23, REGARDLESS OF NATURE OF SUIT.**

☐ II. **110, 130, 190, 196, 370, 375, 376, 440, 442, 443, 445, 446, 448, 470, 751, 820*, 840*, 895, 896, 899.**

☑ III. **120, 140, 150, 151, 152, 153, 195, 210, 220, 230, 240, 245, 290, 310, 315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 367, 368, 371, 380, 385, 422, 423, 430, 450, 460, 462, 463, 465, 480, 490, 510, 530, 540, 550, 555, 560, 625, 690, 710, 720, 740, 790, 791, 861-865, 870, 871, 890, 950.**

***Also complete AO 120 or AO 121. for patent, trademark or copyright cases.**

3. **Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.**

4. **Has a prior action between the same parties and based on the same claim ever been filed in this court?**

YES ☐ **NO** ☑

5. **Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)**

YES ☐ **NO** ☑

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES ☐ **NO** ☐

6. **Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?**

YES ☐ **NO** ☑

7. **Do all of the parties in this action, excluding governmental agencies of the United States and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? - (See Local Rule 40.1(d)).**

YES ☑ **NO** ☐

A. **If yes, in which division do all of the non-governmental parties reside?**

Eastern Division ☑ **Central Division** ☐ **Western Division** ☐

B. **If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?**

Eastern Division ☐ **Central Division** ☐ **Western Division** ☐

8. **If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)**

YES ☐ **NO** ☐

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME Carol E. Head, Assistant United States Attorney

ADDRESS 1 Courthouse Way, Suite 9200, Boston, MA 02210

TELEPHONE NO. [redacted]