

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA, IN AND FOR LAKE COUNTY, FLORIDA**

**IN RE: FORFEITURE OF \$143,953.13  
CRYPTOCURRENCIES WITHIN  
BINANCE HOLDINGS LIMITED  
d/b/a BINANCE WALLETS**

**2023-CA-**

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**VERIFIED COMPLAINT FOR FORFEITURE**

The Petitioner, Peyton C. Grinnell, in his official capacity as the Sheriff of Lake County, Florida, by and through the undersigned counsel, pursuant to the Florida Contraband Forfeiture Act, Sections 932.701-704, *Florida Statutes*, files this Verified Complaint for Forfeiture and alleges:

1. This is a civil action for forfeiture in rem of CRYPTOCURRENCIES WITHIN BINANCE HOLDINGS LIMITED d/b/a BINANCE WALLETS BELONGING TO ALEXANDRU COBILAS TO WIT: \$143,953.13 (hereinafter referred to as “the Contraband”), brought pursuant to the Florida Contraband Forfeiture Act, Section 932.701 et. seq., *Florida Statutes*, arising from violations of Sections 817.034(4)(a)(1) and 896.101(5)(c) *Florida Statutes*.

2. This Court has subject matter jurisdiction pursuant to Section 932.704(2) *Florida Statutes* and this Court also has in rem jurisdiction over the Contraband, and venue lies in Lake County pursuant to Section 47.011, *Florida Statutes*.

3. The Contraband was frozen pursuant to a duly entered judicial warrant to Binance Holdings Limited d.b.a. Binance, Harbour Place, 2<sup>nd</sup> Floor North Wing, George Town, Grand Cayman, Cayman Islands, under Lake County Sheriff’s Office Case Number 230019025.

4. The seizing law enforcement agency as set forth in Section 932.703, *Florida Statutes*, is the Lake County Sheriff’s Office (“LCSO”).

5. Alexandru Cobilas and his victims (“Victims”) may claim an interest in the Contraband. However, Alexandru Cobilas has yet to prove he has standing to challenge or participate in this civil forfeiture action. LCSO stipulates that any and all identified victims are innocent victims of Alexandru Cobilas’s organized fraud, and LCSO has no objection to and supports the court-ordered return of money stolen from those ascertainable victims.

6. On April 26, 2023, in furtherance of an investigation of Organized Scheme to Defraud in violation of Fla. Stat. 817.034(4)(a)(1) and Money Laundering in violation of Fla. Stat. 896.101(5)(c), LCSO Economic Crimes Detective M., assisted by other law enforcement officers from LCSO, through the execution of a search and seizure warrant, seized the Contraband pursuant to the criminal investigation more fully described below.

7. On January 25, 2023, Victim, who resides within Lake County, discovered her computer screen had frozen and was provided a number to call Microsoft. The Victim called the number and spoke to someone who she believed was a representative of Microsoft. The Victim was told a diagnostic test was conducted on the computer that her banking account was hacked. The Victim was asked who she banked with and that she would be transferred to the bank's fraud department. The person the Victim spoke to advised \$20,000 was withdrawn from her account by someone in Russia and that her personal information was used to verify the transaction. The Victim was advised she would need to get a new Social Security Number, and asked to provide the number of accounts she had and how much money was in them. In a subsequent call, the Victim was told that the Social Security Administration had a procedure to move money from her compromised accounts, into Cryptocurrency accounts, and then back to accounts with her new Social Security Number. The Victim was instructed to keep this information a secret and to fill out a form for a new Social Security Number. The next day, the Victim was told that the Social Security Administration agreed to take her case, but required a \$50,000 deposit into an offline crypto account at an Athena Bitcoin ATM located at 1200 W. Main Street in Leesburg, FL.

8. On January 26th and January 27, 2023, the Victim made deposits totaling \$25,000 into the Bitcoin account through Bittrex. On January 30, 2023, \$100,000 was wire transferred from the Victim's bank account into the Bittrex account. On February 7, 2023, the Victim was asked to and conducted deposits totaling \$24,900 at the Athena Bitcoin ATM. The Victim did not realize she fell Victim to this scam until February 8th, 2023.

9. The following transactions took place at an Athena Bitcoin ATM located in Leesburg, FL where the Victim was instructed to send the total of \$49,900 in the form of Bitcoin (BTC):

A. -01/26/23 at 14:02 hrs

Transaction ID: 0b102be5a5

Address: 1LiVc6b8Sh4dryJm2J893NUWZ52FR5nSGP Cash Tendered: \$10,000

Bitcoin Purchased: 0.36152611

B. -01/26/23 at 14:21 hrs

Transaction ID: 7a916a614c

Address: 1LiVc6b8Sh4dryJm2J893NUWZ52FR5nSGP Cash Tendered: \$10,000

Bitcoin Purchased: 0.36152180

C. -01/26/23 at 14:29 hrs

Transaction ID: 4a7f8be983

Address: 1LiVc6b8Sh4dryJm2J893NUWZ52FR5nSGP Cash Tendered: \$10,000

Bitcoin Purchased: 0.18077874

D. -01/27/23 at 14:48 hrs

Transaction ID: bfeab393f6

Address: 16xCgBTJ9WciFTPUj6XcKcqBKje6mseMZM Cash Tendered: \$10,000

Bitcoin Purchased: 0.35872446

E. -02/07/23 at 15:04 hrs

Transaction ID: bb545d6a8a

Address: 1HQ47fnFv3j3e8Q37dywttTJCMGPyHNRkL Cash Tendered: \$5,000

Bitcoin Purchased: 0.18026461

F. -02/07/23 at 15:18 hrs

Transaction ID: d2e31e42d6

Address: 1HQ47fnFv3j3e8Q37dywttTJCMGPyHNRkL Cash Tendered: \$10,000

Bitcoin Purchased: 0.36093221

G. -02/07/23 at 15:34 hrs

Transaction ID: 11c3b02ba5

Address: 1HQ47fnFv3j3e8Q37dywttTJCMGPyHNRkL Cash Tendered: \$9,900

Bitcoin Purchased: 0.35552604

10. On January 13, 2023, the Victim filed a formal report with the Lake County Sheriff's Office.

11. On February 14, 2023, Deputy M. was assigned to this case. Deputy M. contacted USSS Contract Financial Investigator B.W. who assisted Deputy M. with tracing where the Bitcoin went after the Bitcoin ATM deposits. A trace of the purchases of Bitcoin made on February 7, 2023 to 1MPXbNBf6K2ZTacBZ6PeVA6h9iQopdyRK1 (1HQ47...HNRkL) were combined and transferred to the Binance wallet address 1MPXbNBf6K2ZTacBZ6PeVA6h9iQopdyRK1 (1MPXb...dyRK1). This transaction took place on February 8, 2023. While in this wallet, Victim funds were converted to USDT and sent to several different exchanges. Victim funds valued at \$6,160 USDT were traced to a different wallet held on the Binance Exchange. On February 10th, 2023, the \$6,160 USDT transferred to Binance wallet address TBLABu819XQCaLJ6azGqpCKo6UPQMwid6 (TBLAB...Mwid6).

12. Binance identified the suspect wallet as belonging to an individual named Alexandru Cobilas, a twenty-nine-year-old national of the Republic of Moldova. Access logs provided from Binance confirm that the User ID assigned to this account was used to access and move funds from IP addresses in Moldova. USSS Investigator B.W. utilized analytical software and databases to conduct research on the Binance user Alexandru Cobilas and found that the user is flagged for connections involving high risk fraudulent activity on Blackhat and Carding forums.

13. Based on the facts revealed by the joint investigation between the Lake County Sheriff's Office and the United States Secret Service, coupled with Detective M.'s training and experience, there was probable cause to seize and secure the assets identified in the Binance suspect account, as ordered by Lake County Circuit Judge Takac in his Order finding probable cause dated May 2, 2023.

14. The seized contraband is under the control of LCSO pending further order of this Court.

15. The contraband was obtained through Organized Scheme to Defraud in violation of Fla. Stat. 817.034(4)(a)(1) and Money Laundering in violation of Fla. Stat. 896.101(5)(c), and all in violation of the Florida Contraband Forfeiture Act. §932.702(5) *Florida Statutes*. These violations are felonies, and all the seized funds are "presumed" contraband under The Florida Contraband Forfeiture Act. §932.701(2)(a)(5), *Florida Statutes* (2022).

16. The wallet and the funds seized therein are contraband articles as defined in Section 932.701(2)(a), *Florida Statutes*, and are subject to forfeiture pursuant to the Florida Contraband Forfeiture Act because under Section 932.702 it is unlawful:

- a. To conceal or possess any contraband article;
- b. To use any vessel, motor vehicle, aircraft, other personal property, or real, to facilitate the transportation, carriage, conveyance, concealment, receipt, possession, purchase, sale, barter, exchange, or giving away of any contraband article;
- c. To conceal, possess, or use any contraband article as an instrumentality in the commission of or in aiding or abetting in the commission of any felony or violation of the Florida Contraband Forfeiture Act; or
- d. To acquire personal property by the use of proceeds obtained in violation of the Florida Contraband Forfeiture Act.

19. Thus, the Contraband is forfeitable to the Lake County Sheriff's Office because personal property used in violation of any provision of the Florida Contraband Forfeiture Act, or in, upon, or by means of which any violation of the Florida Contraband Forfeiture Act has taken or is taking place, may be seized and shall be forfeited subject to the provisions of the Florida Contraband Forfeiture Act pursuant to Section 932.703(1)(a), Florida Statutes.

20. Pursuant to Section 932.703(6), Florida Statutes, Petitioner requests this Court order the forfeiture of any property of any claimant, up to the value of any property subject to forfeiture, if any of the contraband property described in this Petition, or otherwise shown to exist during the course of this action:

- a. Cannot be located;
- b. Has been transferred to, sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value by any act or omission of the person in possession of the property; or
- e. Has been commingled with any property which cannot be divided without difficulty.

21. A Verified Supporting Affidavit signed by Detective M. as to the veracity of the allegations contained herein is attached and incorporated as Petitioner's Exhibit "A."

22. The Petitioner has complied with Section 932.703(3)(a), and all conditions precedent have been fulfilled.

**WHEREFORE**, Petitioner, Peyton C. Grinnell, in his official capacity as the Sheriff of Lake County, respectfully requests this Court, pursuant to the Florida Contraband Forfeiture Act, issue a judgment of forfeiture and order the contraband be forfeited to the Lake County Sheriff's

Office, subject to the provisions of The Florida Contraband Forfeiture Act, for its use and disposal according to law, and all right, title, and interests in Contraband, relating back to the date of seizure, be perfected in the Lake County Sheriff's Office.

Dated this 8th day of June, 2023.

/s/ Derek A. Schroth

DEREK A. SCHROTH

Lake County Sheriff's Office

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