

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

**IN RE: FORFEITURE OF 10000.687 USDT  
and 0.91657038 BTC, WITHIN BINANCE  
HOLDINGS LIMITED d/b/a BINANCE**

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**CASE NO. 2024-CA-**

**LCSO Case No. 230097965**

**VERIFIED COMPLAINT FOR FORFEITURE**

The Petitioner, PEYTON C. GRINNELL, in his official capacity as the Sheriff of Lake County, Florida (hereafter “Petitioner”), 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:

**Jurisdiction and Venue**

1. This is a civil action for forfeiture of approximately \$10000.687 USDT cryptocurrencies and 0.91657038 BTC (collectively the “Contraband”) within Binance Holdings Limited d/b/a Binance, brought pursuant to the Florida Contraband Forfeiture Act, Section §932.701 et. seq., *Florida Statutes*, arising from violations of Sections §817.034(4)(a)(3) and §896.101(5)(a), *Florida Statutes*.

2. This Court has subject matter jurisdiction pursuant to Section §934.704(2) *Florida Statutes* and this Court also has in rem jurisdiction over the Contraband and venue lies in Lake County pursuant to §47.011 *Florida Statutes*.

**The Parties**

3. The Contraband was frozen pursuant to a duly entered judicial warrant to Binance Holdings Limited d/b/a Binance (“Binance”), with a registered agent address of Harbour Place, 2nd Floor North Wing, George Town, Grand Cayman, Cayman Islands.

4. The seizing law enforcement agency as set forth in Section §932.703, *Florida Statutes*, is

the Lake County Sheriff's Office ("LCSO").

5. Suspect Nikulkumar Moradiya and his/her victim(s) ("Victims") may claim an interest in the Contraband. However, Nikulkumar Moradiya has yet to prove he/she has standing to challenge or participate in this civil forfeiture action. Petitioner stipulates that any and all identified victims are innocent victims of Nikulkumar Moradiya's organized fraud and money laundering, and Petitioner has no objection to and supports the court-ordered return of money stolen from those ascertainable victims.

6. Suspect Juned Bhadeliya and his/her victim(s) ("Victims") may claim an interest in the Contraband. However, Juned Bhadeliya has yet to prove he/she has standing to challenge or participate in this civil forfeiture action. Petitioner stipulates that any and all identified victims are innocent victims of Juned Bhadeliya's organized fraud and money laundering, and Petitioner has no objection to and supports the court-ordered return of money stolen from those ascertainable victims.

### **General Allegations**

7. On or about August 18, 2023, in furtherance of an investigation of Organized Scheme to Defraud in violation of Fla. Stat. §817.034(4)(a)(3) and Money Laundering in violation of Fla. Stat. §896.101(5)(a), LCSO Economic Crimes Detective M., assisted by other law enforcement officers from Lake County Sheriff's Office, through the execution of a search and seizure warrant, seized the Contraband pursuant to the criminal investigation more fully described below.

8. On or about August 7, 2023, the Victim, who resides within Lake County, contacted the Lake County Sheriff's Office to report she was the victim of fraud. The Victim received an internet popup window claiming that Microsoft detected a virus on her computer and was provided a number to call Microsoft Tech Support. The Victim called the number and spoke to someone who

she believed was a representative of Microsoft. The Victim was told her bank account information had been leaked and her bank account had been accessed. The Victim was then transferred to who she believed was her bank's fraud department and was advised that she needed to move her funds.

9. The suspect(s) accessed and controlled the Victim's computer using a Remote Desktop Software called, UltraViewer. To protect her funds, the Victim was instructed to open a personal digital currency exchange wallet with Coinme. The Victim was instructed to withdraw her money from her "compromised" bank account and purchase Bitcoin at local Coinstar Bitcoin ATM Kiosks. The Bitcoin the Victim purchased went to the Victim's Coinme account.

10. Due to having access and control of the Victim's computer through UltraViewer, the suspect(s) transferred the funds out to Victim's Coinme account. The suspect(s) also conducted outbound wire transfers from the Victim's personal bank account that totaled \$10,037.96 US Currency.

11. Between June 23, 2024 and August 4, 2023, the Victim made a total of ten (10) Bitcoin purchase deposits into her Coinme account using Coinstar ATM Kiosks located at 944 Bichara Blvd., Lady Lake, FL 32159 and 340 South SR 434 Suite 1034, Altamonte Springs, FL 32714. These ten (10) transactions totaling \$7,870.00 US Currency purchased a total of 0.453795 BTC.

12. As a result of this scam, the Victim is at a total loss of \$17,907.9611. On August 7, 2023, the Victim filed a report with the Lake County Sheriff's Office.

13. On or about August 9, 2023, a trace was conducted which revealed the Victim funds were sent to the following Binance wallet address: 1CvswE82gPnxZceWTPX1cbvCvb2W7LX5h.

14. This wallet was found to be attributed to Binance Holdings Limited d.b.a. Binance exchange. It was determined that on July 4, 2023, August 2, 2023, and August 3, 2023, Victim funds were sent to an un-hosted Wallet Cluster and comingled with other Bitcoin before being

transferred to the afore-mentioned wallet address (i.e. 1Cvsw...7LX5h) on August 3, 2023.

15. Binance identified the wallet as a corporate account, which allows the account to have more than one owner. The wallet is listed as being owned by two subjects (collectively the “Claimants”) - Nikulkumar Gordhanbhai Moradiya (DOB: 08/28/1990) and Juned Riyaz Bhadeliya (DOB: 12/11/1988). The Know Your Customer Documentation for Claimants contained passports from the Republic of India. Access logs for the account confirm that the User ID assigned to this account accessed and moved funds from IP addresses in and around the Republic of India.

16. Binance determined that the amount of cryptocurrency in the wallet was approximately 10000.687 USDT and 0.91657038 BTC.

17. 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 Judge Sarah Jones in her Order finding probable cause dated August 18, 2023.

**Count I – Forfeiture  
(Florida Contraband Forfeiture Act, §932.701, et seq.)**

18. Petitioner re-alleges and incorporates by reference the allegations in Paragraphs 1-17 above as if fully set forth herein.

19. The seized Contraband is under the control of LCSO pending further order of this Court.

20. The Contraband was obtained through Organized Scheme to Defraud in violation of §817.034(4)(a)(3) *Florida Statutes*, Money Laundering in violation of Fla. Stat. §896.101(5)(a), and 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* (2023).

21. 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.

22. 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).

23. 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 Complaint, 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.

24. A Verified Supporting Affidavit signed by Detective M. as to the veracity of the allegations contained herein is *attached hereto as Exhibit "A"* and incorporated herein by reference.

25. The Petitioner has complied with Section §932.703(3)(a) *Florida Statutes*, 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, to 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.

*[The remainder of this page is intentionally left blank.]*

Respectfully submitted this 23rd day of February, 2024.

**CRAWFORD, MODICA & HOLT,  
CHARTERED ATTORNEYS AT LAW**

*/s/ Lindsay C. T. Holt* \_\_\_\_\_

**Lindsay C. T. Holt, Esq.**

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*Attorney for Peyton C. Grinnell,  
Sheriff of Lake County, Florida*

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***Exhibit “A”***

**(TO VERIFIED COMPLAINT FOR FORFEITURE)**

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AFFIDAVIT FOR VERIFICATION OF  
COMPLAINT FOR FORFEITURE

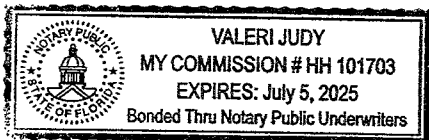
Before me, the undersigned authority, personally appeared Detective Kyle Morrison, who being duly sworn says:

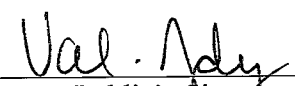
1. I am a sworn law enforcement officer employed by the Lake County Sheriff's Office and currently assigned to the Lake County Special Investigations Unit of the Criminal Investigations Bureau.
2. I took part in the investigation of the property in this case.
3. I have reviewed the VERIFIED COMPLAINT FOR FORFEITURE concerning the above-described property, under Agency Case No. 230097965, and the facts alleged therein are true and correct based on personal knowledge of information developed during the course of my investigation.

  
\_\_\_\_\_  
Detective Kyle Morrison  
Lake County Sheriff's Office

STATE OF FLORIDA  
COUNTY OF LAKE

The foregoing instrument was sworn in person before me this 22<sup>nd</sup> day of February, 2024 by Detective Kyle Morrison, who is personally known to me.



  
\_\_\_\_\_  
Notary Public's Signature

Valeri Judy  
\_\_\_\_\_  
Notary's Printed/Typed/Stamped Name