

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

**IN RE: FORFEITURE OF 22,837.00893 USDT  
CRYPTOCURRENCIES WITHIN  
PAXFUL, INC.**

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**CASE NO: 2025-CA-**

**LCSO Case No: 240004846**

**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 Complaint for Forfeiture and alleges:

**Jurisdiction and Venue**

1. This is a civil action for forfeiture of approximately: 22,837.00893 USDT cryptocurrencies (collectively the “Contraband”) within Paxful, Inc., 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 Paxful, Inc. (“Paxful”), with an address of 4023 Kennett Pike #50541, Wilmington, DE 19807 and an email address of [\\*\\*\\*@paxful.com](mailto:***@paxful.com).

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 NURJAHAN SEKH and his/her victim(s) ("Victims") may claim an interest in the Contraband. However, Nurjahan Sekh 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 Nurjahan Sekh'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**

6. On or about February 13, 2025, in furtherance of an investigation of Organized Scheme to Defraud in violation of Fla. Stat. §817.034(4)(a)(2) and Money Laundering in violation of Fla. Stat. §896.101(5)(b), 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.

7. On January 12<sup>th</sup>, 2024, the Victim, who resides within Marion County, fell victim to a Email Phishing Scam. The Victim received an email advising of an unauthorized \$400.00 charged to his PayPal Account. The Victim was provided with a reference number and phone number to call to file a complaint with PayPal. Upon calling the phone number, the Victim was informed his bank account was compromised. The Victim was then transferred to a person who directed the victim to a website to start the refund process. The Victim entered \$400.00 refund amount on the website. The PayPal "representative" told the Victim he had entered the wrong amount while the website showed a refund amount of \$40,000.00. The Victim was convinced he was refunded the incorrect amount of \$40,000.00 instead of \$400.00. The Victim was instructed

to withdraw the cash from his bank account and return the difference by converting the cash into Bitcoin at a Bitcoin ATM. The Victim was then instructed to travel to an Athena Bitcoin ATM located in Lake County, FL.

8. On January 12<sup>th</sup>, 2024, the Victim made a total of seven transactions at the Athena Bitcoin ATM Kiosk within the Sunoco gas station located at 1200 W. Main St. Leesburg, FL 34748. As a result of this scam, the Victim is at a total loss of \$44,600.00.

9. The following information are the Athena Bitcoin Transactions:

a.) 01/12/24 at 1203hrs

Transaction ID: 9bd7e0631f

Address: bc1qfzecvw26n7eyl6sn56j0czhduj8a3s42lwpg4n

Cash Tendered \$10,000

Bitcoin Purchased: 0.17124771 BTC

b.) 01/12/24 at 1228hrs

Transaction ID: 5014a6879a

Address: bc1qfzecvw26n7eyl6sn56j0czhduj8a3s42lwpg4n

Cash Tendered \$4,800

Bitcoin Purchased: 0.08397788 BTC

c.) 01/12/24 at 1332hrs

Transaction ID: afce9d8b2b

Address: bc1qfzecvw26n7eyl6sn56j0czhduj8a3s42lwpg4n

Cash Tendered \$6,800

Bitcoin Purchased: 0.10301678 BTC

d.) 01/12/24 at 1345hrs

Transaction ID: 525c1e9182

Address: bc1qfzecvw26n7eyl6sn56j0czhduj8a3s42lwpg4n

Cash Tendered \$3,800

Bitcoin Purchased: 0.06634551 BTC

e.) 01/12/24 at 1456hrs

Transaction ID: c68c20c5dd

Address: bc1qfzecvw26n7eyl6sn56j0czhduj8a3s42lwpg4n

Cash Tendered \$4,000

Bitcoin Purchased: 0.06974552 BTC

f.) 01/12/24 at 1505hrs

Transaction ID: 9b06c11313  
Address: bc1qfzecvw26n7eyl6sn56j0czhduj8a3s42lwpg4n  
Cash Tendered \$6,000  
Bitcoin Purchased: 0.10285551 BTC

g.) 01/12/24 at 1758hrs  
Transaction ID: 80b4ffcf52  
Address: bc1qfzecvw26n7eyl6sn56j0czhduj8a3s42lwpg4n  
Cash Tendered \$10,000

10. As a result of this scam, the Victim's estimated total loss of cryptocurrency is \$44,600.00 given the Asset's market value at the time of theft.

11. On January 13, 2024, the Victim initiated a report with the Lake County Sheriff's Office.

12. On or about January 13, 2024, a trace was conducted which revealed the Victim funds were sent to wallet address 3CHNumKbbZwMVEArJME2PNtZWF6kJQ2ahQ.

13. This wallet was found to be attributed to Paxful, Inc. (hereinafter "Paxful") exchange.

14. Paxful identified the wallet as a personal account being owned by Nurjahan Sekh (DOB: \*\*/\*\*/1988). The Know Your Customer Documentation for Claimant contained a passport from the Republic of India.

15. Paxful determined that the amount of cryptocurrency in the wallet was approximately 22,837.00893 USDT cryptocurrency.

16. 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 Paxful suspect account, as ordered by Lake County Judge Cary F. Rada in his Order finding probable cause dated February 27, 2025.

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

17. Petitioner re-alleges and incorporates by reference the allegations in Paragraphs 1-16 above as if fully set forth herein.

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

19. The Contraband was obtained through Organized Scheme to Defraud in violation of §817.034(4)(a)(2) *Florida Statutes*, Money Laundering in violation of Fla. Stat. §896.101(5)(b), 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).

20. 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.

21. 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).

22. 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.

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

24. 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.

Respectfully submitted this 28<sup>th</sup> day of March 2025.

**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 Economic Crimes 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. 240004846, 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 #2550  
Lake County Sheriff's Office

STATE OF FLORIDA  
COUNTY OF LAKE

The foregoing instrument was sworn in person before me this 27<sup>th</sup> day of March 2025, by Detective Kyle Morrison, who is personally known to me.

  
\_\_\_\_\_  
Circle One: Deputy/Certified Officer / Notary Public Signature

Det. A. Pringle 2551  
\_\_\_\_\_  
Deputy/Certified Officer / Notary Public Printed Name