

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

**IN RE: FORFEITURE OF APPROXIMATELY  
0.11729398 BTC, CRYPTOCURRENCIES  
WITHIN BITGET TECHNOLOGY GROUP LTD**

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**CASE NO. 2025-CA-**

**Agency Case No. 250011405**

**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: 0.11729398 BTC cryptocurrencies (collectively the “Contraband”) within Bitget Technology Group LTD, 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 and Potential Claimants**

1. The Petitioner is PEYTON C. GRINNELL, in his official capacity as THE LAKE COUNTY SHERIFF, for Lake County, Florida.

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

3. The Contraband was frozen pursuant to duly entered judicial warrants to BITGET

TECHNOLOGY GROUP LTD (“Bitget”), with a registered agent address of 4255 South Buckley Road #1296, Aurora, CO 80013.

4. Information in the possession of the Petitioner indicates that Suspect MOHAMMAD SHAHID (hereinafter referred to as “Claimant”) and their victim(s) (“Victim”) may claim an interest in the Contraband. However, MOHAMMAD SHAHID has yet to prove he has standing to challenge or participate in this civil forfeiture action. Petitioner stipulates that any and all identified victim(s) are innocent victim(s) of Claimant’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**

5. On or about May 9, 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)(c), 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.

6. On January 28<sup>th</sup>, 2025, the Victim, who resides within Lake County, fell victim to an Apple Tech Support Scam. The Victim received a text message from what she believed was from Apple. The message alerted the Victim that her Apple iCloud for had suspicious activity and a \$143.95 purchase had been made at the Apple store. The Victim was instructed to contact the listed phone number if the order was not approved. The Victim called the number to dispute it and request a refund. After communicating with multiple subjects over the phone, the Victim was told a hacker located in China had used her bank account to get \$16,200.00 and the Victim was to make a duplicate transaction by withdrawing the funds from her account and establish a Bitcoin wallet.

On January 29<sup>th</sup>, 2025, the scammer told the Victim the same hacker was attempting another transaction of \$17,100.00 and instructed the Victim to withdraw that amount to add it to the Bitcoin wallet she established. On January 30<sup>th</sup>, 2025, the scammer instructed the victim to withdraw funds from her CD account and get a cash advance from her credit card. The Victim then withdrew \$8,600.00 more from her accounts and purchased more Bitcoin as instructed by the scammer.

7. On January 28<sup>th</sup>, 2025, the Victim went to the Bitcoin Depot ATM located at 2101 W. Main St. Leesburg, FL 34748 and purchased \$16,200.00 worth of Bitcoin. On January 29<sup>th</sup>, 2025, the Victim went to Athena Bitcoin ATM located at 1800 S. French Ave. Sanford, FL 32711 and purchased \$17,100.00 worth of Bitcoin. On January 30<sup>th</sup>, 2025, the Victim went to the same Bitcoin Depot ATM in Leesburg, FL and purchased \$8,600.00 worth of Bitcoin. As a result of this scam, the Victim is at a total loss of \$41,900.00.

8. The Victim was messaged three QR Codes that were linked to the Bitcoin deposit addresses where the Victim was to send her money. The following information are the three transactions performed by the Victim:

- a. Date: 01/28/25  
Cash: \$16,200.00  
Bitcoin Purchased: 0.11270417 BTC  
Deposit Address: 1ASqxN2e8gNg8kLcYHMZQKQg5LCWoPnDLG
- b. Date: 01/29/25  
Cash: \$17,100.00  
Bitcoin Purchased: 0.11270417 BTC  
Deposit Address: 1J9zDkTcZhotsNfrMyQmyDiyHXzH39Q1up
- c. Date: 01/30/25  
Cash: \$8,600.00  
Bitcoin Purchased: 0.05743393 BTC  
Deposit Address: bc1qdqn53lf440xvh783dfhqpj7uvfk3cdczwzcas

9. On February 3<sup>rd</sup>, 2025, Detective M. began his investigation. Using the receipts the Victim provided, Detective M. identified the deposit addresses and traced the cryptocurrency through the blockchain. Detective M. determined that the Victim's Bitcoin sent under the first transaction to deposit addresses 1ASqxN2e8gNg8kLcYHMZQKQg5LCWoPnDLG, (1ASqxN...oPnDLG), was ultimately transferred on January 29<sup>th</sup>, 2025 to 1HmwxAQPW79irGDwBtUppVnLGFxy4YVVCh, (1HmwxA...4YVVCh), which is a hosted address attributed to a different exchange called, Binance. Your Affiant determined the Victim's Bitcoin sent under the second transaction to deposit address 1J9zDkTcZhotsNfrMyQmyDiyHXzH39Q1up (1J9zDk...39Q1up) was ultimately transferred on January 29<sup>th</sup>, 2025 to 16L4vRF1NpYZVtjZNccLmetURt3naCAaAa (16L4vR...aCAaAa), which is a hosted address attributed at the Bitget exchange. Detective M. determined that the Victim's Bitcoin sent under the third transaction to deposit address bc1qdn53lf440xvh783dfhqpj7uvfk3cdczwzcas (bc1qdq...zwzcas), was ultimately comingled with additional Bitcoin and transferred on February 3<sup>rd</sup>, 2025, to the same Bitget exchange address (16L4vR...aCAaAa), and the same Binance exchange address (1HmwxA...4YVVCh).

10. Once the receiving addresses and exchanges were identified, Detective M. submitted an official Account Information Request on agency letterhead to Binance for suspect wallet address (1HmwxA...4YVVCh) and provided the same request to Bitget for suspect wallet address (16L4vR...aCAaAa). Binance and Bitget complied with the requests and provided the requested account data. Binance and Bitget identified the suspect wallets as being a personal account belonging to a male subject identified as Mohammad Shahid (DOB: \*\*/\*\*/2002). The Know Your Customer Documentation for this account contained Mohammad Shahid's identification card issued by the Government of India. Detective M. found that the first deposit of

Victim Bitcoin into Mohammad Shahid's Bitget account was withdrawn from the account that same day. Detective M. was able to freeze the Victim's Bitcoin that was transferred to the account on February 3<sup>rd</sup>, 2025.

11. A review of the wallet addresses revealed blockchain activity that is indicative of a scam, such as rapid hops (subsequent transfers to another wallet), to hot wallets (a wallet that can be hosted by an exchange that is primarily leveraged to act as an intermediary between transactions being converted from crypto to fiat). These wallets have high velocity transactions and patterns that have been identified as a flag of potential scam and laundering activity. Upon reviewing the Bitget account, Detective M. found the account was created on January 11th, 2025, less than one month prior to receiving the victim's funds. Detective M. determined that the account had received deposits of over 5.65 Bitcoin, and over \$580,000 withdrawn from the account since the Bitget account was created. Detective M. has coordinated with the Department of Homeland Security Investigations (HSI) about Mohammad Shahid's accounts. HSI advised Shahid is part of a federal investigation and have identified around 70 victims around the United States of America where victim funds have been laundered into accounts belonging to Shahid.

12. Accordingly, on May 9, 2025, pursuant to warrant served on Bitget Technology Group, LTD, account holdings from the above-referenced accounts were seized as follows: 0.11729398 BTC.

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 Bitget suspect account, as ordered by Lake County Judge Carla R. Pepperman in her Order finding probable cause dated May 22 , 2025.

14. The seized cryptocurrency is currently being held by the Lake County Sheriff's Office pending further order of the Court of competent jurisdiction.

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

15. Petitioner re-alleges and incorporates by reference the allegations in Paragraphs 1-14 above as if fully set forth herein.

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

17. 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)(c), 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).

18. 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).

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 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.

**Petitioner's Compliance  
with Florida Statutes §§932.701, 932.703, and 932.704**

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

22. The Petitioner has complied with section 932.703 (2)(a), Florida Statutes, by providing potential Claimants, Suspects, and/or Victims, within five (5) working days after the seizures, respective notice of the seizures and notice of the right to an adversarial preliminary hearing and notice that said person(s) may request an adversarial preliminary hearing within fifteen

(15) days after receiving such notice.

23. The Petitioner has complied with section 932.703(2)(a), Florida Statutes, by applying for an obtaining the Ex-Parte Orders Finding Probable Cause for Seizure as referenced herein.

24. The Petitioner has promptly proceeded against the Contraband Property by filing the initial Verified Complaint for Forfeiture within forty-five (45) days of the seizure as mandated by sections 932.701(2)(c) and 932.704(4), Florida Statutes.

**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 12<sup>th</sup> day of June 2025.

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

/s/ Lindsay C. T. Holt

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

FL Bar No. 0041179

380 W. Alfred Street

Tavares, FL 32778

Telephone: 352-432-8644

Facsimile: 352-432-8699

Primary: lholt@cmhlawyers.com

Secondary: aeli@cmhlawyers.com  
service@cmhlawyers.com

*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. 250011405, and the facts alleged therein are true and correct based on personal knowledge of information developed during the course of my investigation.

 2550

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

STATE OF FLORIDA  
COUNTY OF LAKE

The foregoing instrument was sworn in person before me this 12<sup>th</sup> day of June, 2025 by Detective Kyle Morrison, who is personally known to me.

 3095

\_\_\_\_\_  
Deputy/Certified Officer / Notary Public's Signature

\_\_\_\_\_  
Detective Jacob Chichester 3095  
Deputy/Certified Officer / Notary Public Printed Name