

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

**IN RE: FORFEITURE OF APPROXIMATELY  
8456.461186 USDT and 0.50125466 BTC,  
CRYPTOCURRENCIES WITHIN  
NEST SERVICES LIMITED, d/b/a BINANCE**

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**Agency Case No. 250011544**

**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: 8456.461186 USDT and 0.50125466 BTC cryptocurrencies (collectively the “Contraband”) within Nest Services 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)(b), *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**

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

4. 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”).

5. The Contraband was frozen pursuant to duly entered judicial warrants to NEST SERVICES LIMITED, d/b/a BINANCE (“Binance”), with a registered agent address of House of Francis, Room 303, Ile du Port, Mahe, Seychelles.

6. Information in the possession of the Petitioner indicates that Suspect NASIN NASIM (hereinafter referred to as “Claimant”) and her victim(s) (“Victim”) may claim an interest in the Contraband. However, NASIN NASIM has yet to prove she 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**

7. On or about May 16, 2025, 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)(b), Lake County Sheriff’s Office Economic Crimes Detective M., assisted by other law enforcement officers from Lake County Sheriff’s Office (“LCSO”), through the execution of a search and seizure warrant, seized the Contraband pursuant to the criminal investigation more fully described below.

8. On January 7<sup>th</sup>, 2025, the Victim, who resides within Lake County, fell victim to a McAfee Antivirus Protection Scam. The Victim received an email from what he believed was for McAfee Antivirus Protection. The email included a subscription order confirmation for \$571.57 and 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 interacting with the email, it appeared as if someone had full access to his personal computer. The victim explained that the person controlling his computer

manipulated his bank account to reflect that \$20,000 had been mistakenly refunded into his account. The victim began receiving phone calls from two different individuals who advised that he had to withdraw the funds from his bank and deposit the funds into a Bitcoin ATM machine to return his account back to normal. The Victim was emailed a QR Code that is linked to a Bitcoin deposit address where the Victim was to send her money. The deposit address was identified as 1NZkurTP6QmBfYxF1orGetVTotwfPS2z6m.

9. On January 29<sup>th</sup>, 2025, the Victim went to a local Bitcoin Depot ATM and purchased \$10,800.00 worth of Bitcoin. On January 30<sup>th</sup>, 2025, the Victim again went to a local Bitcoin Depot ATM and purchased \$9,900.00 worth of Bitcoin. The Victim made a total of two separate transactions. As a result of this scam, the Victim is at a total loss of \$20,700.00.

10. The following information are the two transactions performed by the Victim:

- a. Date: 01/29/25  
Cash: \$10,800.00  
BTC Sent: 0.07298516 BTC  
Address: 1NZkurTP6QmBfYxF1orGetVTotwfPS2z6m
- b. Date: 01/30/25  
Cash: \$9,900  
BTC Sent: 0.06584026 BTC  
Address: 1NZkurTP6QmBfYxF1orGetVTotwfPS2z6m

11. On February 3<sup>rd</sup>, 2025, Detective M. was assigned to this investigation. Using the receipts pertaining to the deposits into the Bitcoin ATM, Detective M. traced cryptocurrency through the blockchain. Detective M. determined that deposit address 1NZkurTP6QmBfYxF1orGetVTotwfPS2z6m, (1NZkur...PS2z6m), is a hosted address attributed to the Binance exchange.

12. Detective M. then provided an official Account Information Request on agency letterhead to Binance for suspect wallet address (1NZkur...PS2z6m) and requested a voluntary

freeze be placed on the account. Binance complied with the requests and provided the requested account data. Binance identified this suspect wallet as being a personal account belonging to a male subject identified as Muhammed “Md.” Shazid (DOB: \*\*/\*\*/1993). The Know Your Customer Documentation for this account contained Md. Shazid’s identification card issued by the Government of India. Detective M. found Md. Shazid’s account was created just four days before receiving the victim’s funds on January 25<sup>th</sup>, 2025.

13. Detective M. reviewed Md. Shazid’s Binance account and determined that the victim’s Bitcoin funds were sold for Tether (USDT), combined with additional USDT, and transferred to another Binance user account identification number identified as 970059390. On January 30<sup>th</sup>, 2025, -20435.19 USDT was transferred from Md. Shazid to Binance User ID 970059390. On February 1<sup>st</sup>, 2025, -37,102.72 USDT was transferred from Md. Shazid to Binance User ID 970059390.

14. Detective M. then provided an official Account Information Request on agency letterhead to Binance for Binance User ID 970059390 and requested a voluntary freeze be placed on the account. Binance complied with the requests and provided the requested account data. Binance identified the suspect wallet as being a personal account belonging to a female subject identified as Nasin Nasim (DOB: \*\*/\*\*/2004). The Know Your Customer Documentation for this account contained Nasin Nasim’s identification card also issued by the Government of India.

15. 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. Detective M. reviewed

the access logs for both accounts and determined that Md. Shazid and Nasin Nasim are working together and laundering funds between the accounts. For the transfer that took place on January 30, 2025, both accounts have the same captured Internet Protocol (IP) address of 103.59.72.18 and the same captured Geolocations of India Kolkata. For the transfer that took place on February 1, 2025, Md. Shazid's account transferred the funds to Nasin Nasim's account at 07:51:07 hours. An attempt to withdraw these funds from Nasin Nasim's account was made less than one minute later at 07:52:47 hours. These wallets have high velocity transactions and patterns that have been identified as a flag of potential scam and laundering activity.

16. Based upon the above information, a Search and Seizure Warrant was signed by the Honorable Judge James R. Baxley on February 12, 2025, ultimately resulting in the seizure of approximately 8456.461186 USDT and 0.50125466 BTC cryptocurrency as described in the preceding paragraphs.

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

18. Accordingly, on May 16, 2025, pursuant to warrant served on Nest Services Limited, d/b/a Binance from the above-referenced accounts were seized as follows: 8456.461186 USDT and 0.50125466 BTC.

19. 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 Cary Rada in his Order finding probable cause dated May 29, 2025.

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

20. Petitioner re-alleges and incorporates by reference the allegations in Paragraphs 1-19 above as if fully set forth herein.

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

22. 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)(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*.

23. 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.

24. 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).

25. 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**

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

27. 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.

28. 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.

29. 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 26<sup>th</sup> day of June 2025.

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

/s/ Lindsay C. T. Holt

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

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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 Fraud and 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. 250011544, 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 25th 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**