

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

**IN RE: FORFEITURE OF APPROXIMATELY
0.02316281 BTC CRYPTOCURRENCIES
WITHIN COINBASE**

CASE NO. 2026-CA- 962

Agency Case No. 260010883

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: 0.02316281 BTC cryptocurrencies (the “Contraband”) within Coinbase, 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 Fla. Stat. §934.704(2) and this Court also has in rem jurisdiction over the Contraband and venue lies in Lake County pursuant to Fla. Stat. §47.011.

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 Fla. Stat. §932.703, is the Lake County Sheriff’s Office (hereinafter referred to as “LCSO”).

5. The Contraband was frozen pursuant to a duly entered judicial warrant to

COINBASE, with a registered agent address of 248 3rd Street, # 434, Oakland, CA 94607.

6. Information in the possession of the Petitioner indicates that Suspect SHIRLEY RICHARDSON (hereinafter referred to as “Claimant”) and her victim(s) (“Victim”) may claim an interest in the Contraband. However, Shirley Richardson 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 March 13, 2026, 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), Lake County Sheriff’s Office Economic Crimes Detective C., 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 or about January 30, 2026, the LCSO responded to the Victim’s address located in unincorporated Lake County, FL. Contact was made with the Victim, who was identified by their Florida Driver's License. The Victim advised that on the current date (1/30/2026), they were contacted by who they thought was the Lake County Sheriff's Office and was told they missed jury duty. The Victim was told that to resolve this; they needed to pay five thousand dollars (\$5,000 USD) in the form of bitcoin. The Victim was told to go to a Chevron station to a bitcoin machine.

9. The Victim proceeded to a Chevron gas station at 19A and Holly Street in Mount Dora, Florida and deposited the five thousand dollars into the bitcoin machine. The transaction

receipt from the Bitcoin Depot was provided: Order #Q7T6NZEG and a photo of the receipt was taken and uploaded to Evidence.com.

10. On January 31, 2026, while on-call for the Fraud and Economic Crimes: Cryptocurrency Unit, Detective C., received notification of the above scam that occurred:

Transaction 1: Bitcoin Depot BTM // RECEIPT: Q7T6NZEG // 1/30/26 @ 5:27 PM EST
BTC Sent: 0.04195346 BTC (~\$5,000 USD)
RED 1 Address (Receiving): bc1qhws2mh7qg37yw5r2zpppatm9545833nx008vw
TXID: 8bfd2abf885dd71c33bc4f4a5d9d8e2d95b18eddeb235ed1b09cc199e07caaa7

Transactions 1, using cryptocurrency tracing software TRM Labs Analytics, the following twelve (12) transactions occurred, nine (9) were divided into two (2) different exchange companies (PURPLE) sent from RED 1:

PURPLE 1 Address (BC.GAME): bc1qehpy20msg4dx5rnspxzhpdn90t2ezs3amg2tp8
TxID 1: e3ef17c1cb172cd4266ca7ca12820f4581e54f83cf540223fc31a02e60f9d02f
TxID 2: 236fc529708741f1a5efc00cea7d361f87347487abfed1458adbbc7df32cca34
TxID 3: 169c252ad889953f103cabfd44760ca6cc0f3a46578d9d0c022a007f94dac9a1
TxID 4: ef58fd287a5d454c99ccb61db3a8bb189cf02fa6755f3617507ca49692b1fbdb
TxID 5: df931d58eac33942e5b553aaec51dc0702b526aaa549447c2611037e6482b25f
TxID 6: 10da2aaa86d57a622ccad27650a199e6b997b0e6f91ccfc3fcf86ee67f8e5916

PURPLE 2 Address (Coinbase): 3M2iWbsn8vLghno35JQ8W4ATHqJxUhp1BU
TxID: cf02f111b6076ac7d943aee816e05589915f197608f9d91f5ffe2f55a51cbd4c

PURPLE 3 Address (Coinbase): 3Ch7ohWTMnaKU3LVoYCzGeTqPTmcGWFjZd
TxID: 0a430ee1e934fb0eb2db009bb5b1a0711dcafaf52f75eebc9f647d1d48fed0d

PURPLE 4 Address (Coinbase): 3FYHVkni6y8wB7kzo5VRCF9TA6AFzyM2A
TxID: 1460eb12dd9439bd2f28b943355af6f28fb24d884c0677e8da9c50ce96ba3edd

RED 2 Address: bc1q8j3m0vgfz2r7lhexfgh5ecxz53xxq9rend3rxr
TxID: b6391fb7975721bba2bf3adba88833aad23ccbe4a76b466692675442f6bcf225

RED 3 Address: bc1q50r7dccc4ll483nr4gwlj6mygs50sfvfu52y40
TxID: a40bf2576b8820e770b84276a58cbe35ed065150ec9a5273b5d1dad99c7d9c98

RED 4 Address: bc1q0ac77pcwu6af3tqaynu6xw5yr0aw28jgfy8kl
TxID: e67fb4b7b5d90f072f97984015b0c5583b61cc1032dd0408abd5dcdae7ca5681

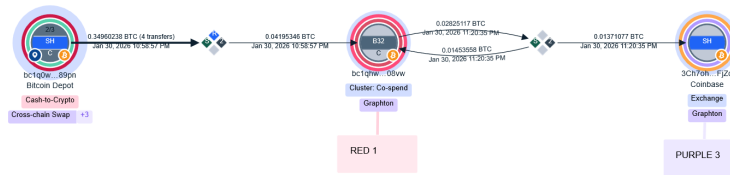
11. An LCSO Agency letterhead was drafted and addressed to Coinbase, requesting all know-your-client (KYC) data and freeze request for PURPLE 2, PURPLE 3, and PURPLE 4. The letterhead draft was sent via email to Coinbase Compliance and submitted via Kodex.

Kodex: Submitted via Online Portal (COIN-23089)

12. Utilizing TRM Labs Analytics, it should be noted at this time that RED 2, RED 3, and RED 4 were all traced one (1) hop further and were identified as too diluted at this time to continue tracing and/or seeking legal processes.

13. Below referenced as “Exhibit A” is an image outlining the transaction tracing. Finer details can be seen by zooming in and out of the document:

“Exhibit A”



14. On February 2, 2026, Detective C. provided an official account information request on via a Florida State Attorney's Office-5th Judicial Circuit Subpoena to Coinbase (248 3rd St, #434, Oakland, CA 94607) for suspect Coinbase addresses PURPLE 2-4. A request to place a voluntary freeze on this account and other suspect accounts was added to the initial account information request.

15. On Tuesday, February 3, 2026, Detective C. received a know-your-client (KYC) return from Coinbase. The information identified the suspect address

(3Ch7ohWTMnaKU3LV0YCzGeTqPTmcGWFjZd) as being a personal account belonging to one subject and the account was created on August 18, 2025. This subject is named Shirley Richardson (DOB: **/**/1968). The KYC documentation for this subject contained a Georgia Driver's License: *****1086 and a mailing address of 76 N Jones St, Fort Valley, GA, 31030.

16. Contact was made with the Victim and was notified of the Seizure attempt and confirmed a total monetary loss of \$5,000.00 USD into the Cryptocurrency ATM: Bitcoin Depot and intent to prosecute.

17. Detective C. determined that the account is being used to launder money based on the attempt to obfuscate the source of the funds by funneling through multiple transactions and exchanges. Assets were frozen in the Suspect's account totaling 0.02317311 BTC (1599.48 USD as of 03/09/2026 @14:22 UTC).

18. Based upon the above information, a Search and Seizure Warrant was signed by the Honorable Judge Sarah Josephine Jones on March 11, 2026, ultimately resulting in the seizure of approximately 0.02316281 BTC cryptocurrency as described in the preceding paragraphs.

19. Based on the facts revealed by the investigation of the Lake County Sheriff's Office and, coupled with Deputy C.'s training and experience, there was probable cause to seize and secure the assets identified in the BloFin suspect account, as ordered by Lake County Judge James R. Baxley in his Order finding probable cause dated March 27, 2026.

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

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

21. Petitioner re-alleges and incorporates by reference the allegations in Paragraphs 1-

20 above as if fully set forth herein.

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

23. 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*.

24. 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.

25. 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).

26. 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**

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

28. 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.

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

30. 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 27th day of April 2026.

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

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EXHIBIT “A”

(TO VERIFIED COMPLAINT FOR FORFEITURE)

