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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE

UNITED STATES OF AMERICA,

6:19-cv-00707-BR

Plaintiff,

**COMPLAINT, *in rem*,
FOR FORFEITURE**

v.

**\$2,457,790.72 in Funds seized from
JPMorgan Chase Bank account #xxx0905;
\$1,266,650.00 in Funds seized from
JPMorgan Chase Bank account #xxx3511;
\$1,383.68 in Funds seized from
JPMorgan Chase Bank account #xxx2125;
\$200,653.71 in Funds seized from
JPMorgan Chase Bank account #xxx8881;
\$32,921.00 US Currency;
\$1,940.77 US Currency;
31.53810677 BTC;
1,022.39066800 ETH; and
5.74017141 BCH;
in rem,**

Defendants.

Plaintiff, United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and Amy E. Potter Assistant United States Attorney, for its complaint *in rem* for forfeiture, alleges:

Complaint *in rem* for Forfeiture

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I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 31 U.S.C. § 5324; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, \$2,457,790.72 in funds seized from JPMorgan Chase Bank account #xxx0905; \$1,266,650.00 in funds seized from JPMorgan Chase Bank account #xxx3511; \$1,383.68 in funds seized from JPMorgan Chase Bank account #xxx2125; \$200,653.71 in funds seized from JPMorgan Chase Bank account #xxx8881; \$32,921.00 US Currency; \$1,940.77 US Currency; 31.53810677 BTC; 1,022.39066800 ETH; and 5.74017141 BCH (hereinafter “Assorted Funds”); were seized in the District of Oregon, and are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendants, *in rem*, Assorted Funds, represent proceeds traceable to a violation of 18 U.S.C. § 2319 (Copyright Infringement), thereby subjecting them to forfeiture pursuant to 18 U.S.C § 2323 and 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the declaration of Keith Druffel, Special Agent, Internal Revenue Service-Criminal Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

IV.

Defendants, *in rem*, Assorted Funds, also represent property involved in a transaction in violation of 18 U.S.C. § 1957 (Money Laundering), thereby subjecting them to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as more particularly set forth in the declaration of Keith

Druffel, Special Agent, Internal Revenue Service-Criminal Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, Assorted Funds; that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

Respectfully submitted this 6th day of May 2019.

BILLY J. WILLIAMS
United States Attorney

s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney

VERIFICATION

I, KEITH DRUFFEL declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Internal Revenue Service-Criminal Investigations and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Keith Druffel
KEITH DRUFFEL
Special Agent
Internal Revenue Service-Criminal Investigations