

FILED

2015 JAN 14 PM 3:27

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

3:15 CV 84

Civil-Case No.:

Judge

JUDGE KATZ

MAG. JUDGE JAMES R. KNEPP, JR.

VERIFIED

COMPLAINT IN FORFEITURE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALL FUNDS CONTAINED IN ACCOUNT
NUMBER 10300002-10552643-48820015,
HELD IN THE NAME OF COLORSHOCK,
S.R.O., AT MKB BANK ZRT IN
BUDAPEST, HUNGARY,

Defendant.

NOW COMES plaintiff, the United States of America, by Steven M. Dettelbach, United States Attorney for the Northern District of Ohio, and Phillip J. Tripi, Assistant United States Attorney, and files this Complaint in Forfeiture, alleging on information and belief the following:

JURISDICTION AND INTRODUCTION

1. This Court has jurisdiction over this in rem proceeding pursuant to 28 U.S.C. § 1345 because the United States is the plaintiff in this action; and pursuant to 28 U.S.C. § 1355(a) because the matter involves an action for recovery of forfeiture of property.

2. This Court has venue in this matter pursuant to 28 U.S.C. §§ 1355(b)(2), which provides in pertinent part, "A forfeiture action or proceeding may be brought in . . . any . . . district where venue for the forfeiture action or proceeding is specifically provided for in section

1395 of this title or any other statute.” This court has venue in this matter pursuant to 28 U.S.C. §§ 1355(b)(1)(A), because any of the acts or omissions giving rise to the forfeiture occurred in this district; pursuant to 28 U.S.C. § 1355(b)(1)(B), incorporating 28 U.S.C. § 1395, because the action accrued in this district; and pursuant to 28 U.S.C. § 1391(b) because a substantial part of the acts or omissions giving rise to the claim occurred in this district.

3. The Defendant All Funds Contained in Account Number 10300002-10552643-48820015, Held in the Name of ColorShock S.R.O., at MKB Bank Zrt. in Budapest, Hungary (hereinafter referred to as “defendant account”) is currently located, and being restrained by a Hungarian-issued court order, at MKB Bank Zrt. in Budapest, Hungary.

4. The defendant account is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) because it was involved in a transaction or attempted transaction in violation of criminal code 18 U.S.C. § 1956 and pursuant to 18 U.S.C. § 981(a)(1)(C) because it represents the proceeds of a wire fraud conspiracy in violation of criminal code 18 U.S.C. §§ 1349 and 1343.

CRIMINAL STATUTES VIOLATED BY KATERINA UZLOVA

5. Katerina Uzlova is currently a fugitive from justice, having been indicted on July 24, 2013 for violating criminal statutes, namely, conspiracy to commit wire fraud and conspiracy to commit money laundering. Title 18, United States Code, Section 1343 provides in pertinent part:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.

6. Title 18, United States Code, Section 1349 provides as follows:

Any person who attempts or conspires to commit any offense *under this chapter* shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or the conspiracy. [emphasis added]

The penalties for wire fraud apply to those persons who engage in a conspiracy to commit that offense since 18 U.S.C. § 1343 is in the same chapter of the criminal code as 18 U.S.C. § 1349.

7. Title 18, United States Code, Section 1956 provides in pertinent part:

(a)(1) Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity—

* * *

(B) knowing that the transaction is designed in whole or in part—

(i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity;

* * *

shall be sentenced to a fine of not more than \$500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than 20 years, or both.

* * *

(a)(2) Whoever transports, transmits, or transfers, or attempts to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States . . . --

* * *

(B) knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer is designed in whole or in part—

(i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity;

* * *

shall be sentenced to a fine of not more than \$500,000 or twice the value of the monetary instrument or funds involved in the transportation, transmission, or transfer whichever is greater, or imprisonment for not more than 20 years, or both.

* * *

(h) Any person who conspires to commit any offense defined in this section . . . shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy.

The “specified unlawful activity” is defined in 18 U.S.C. § 1956(c)(7), which incorporates 18 U.S.C. § 1961(1), under which wire fraud is listed as a predicate offense.

OVERVIEW OF THE FRAUD

8. From approximately July 2012, and continuing until March 13, 2013, individuals using the false names of Roman Novak and Radoslav Novak, nationalities unknown, and other individuals conspired to create a fraudulent Internet-based high yield investment program named Profitable Sunrise promising extremely high rates of return with little or no risk to investors’ funds.

9. The Profitable Sunrise website contained fictitious and false representations causing investors to provide funds for their investment in Profitable Sunrise and it identified Inter Reef Ltd. as the business responsible for generating enormous profits. The fictitious and false representations included the promises of extremely high, unrealistic rates of return; statements that the investment in Profitable Sunrise was “risk-free;” false claims regarding the business activities of Profitable Sunrise; false claims regarding the track record and profitability

of Inter Reef Ltd.; and the use of fictitious names for the persons responsible for Profitable Sunrise.

10. Although numerous investors spoke with Roman Novak, no one ever met him in person. All of Roman Novak's contact with investors was through Skype and other Internet-based communication methods. A State of Michigan identification card in the name of Roman Novak which had been provided to Solid Trust Pay, a third-party Internet-based money remitter used during the scheme, was determined to be a fraudulent document.

11. Regional representatives were identified by Profitable Sunrise, who used at least two companies, NJF Global Group and Focus-Up Ministries, to attract investors to Profitable Sunrise. One of the individuals engaged in promoting the investment fraud resides in the Northern District of Ohio.

12. The persons responsible for Profitable Sunrise directed that investors send funds to Internet money remitters and a series of companies located around the world. Thereafter, the funds were further transferred, obscuring their ultimate destination.

13. Before investing in Profitable Sunrise, prospective investors were required to open a Profitable Sunrise account on the Profitable Sunrise website which contained their contact information to include an email address. Investors could invest through third-party Internet currency exchange/money remitter services such as the now-defunct Liberty Reserve or Solid Trust Pay or through an international wire transfer. If investors chose to fund their account with a wire transfer, after opening an account, investors received an email from Profitable Sunrise. The email contained wire transfer instructions (which investors used for their investment) to any one of four Czech businesses which maintained bank accounts in Hungary and the Czech

Republic. The email further advised potential investors that the wire transfer instructions were only good for five days.

14. The Czech companies which received Profitable Sunrise investors' funds included Colorshock S.R.O., Fortuna-K S.R.O., Solutions Company S.R.O., and Melland Company S.R.O. One of those companies, ColorShock S.R.O., maintained defendant bank account at MKB Bank zrt. in Budapest, Hungary (hereinafter referred to as "MKB Bank"). Several of the investors who sent investments to ColorShock S.R.O. reside in, and sent wire transfers from, the Northern District of Ohio and have reported being defrauded by Profitable Sunrise.

15. The law enforcement investigation conducted to date has identified that approximately 15,000 persons invested at least \$37,000,000 into the Profitable Sunrise scheme between July 2012, and March 2013, by transferring funds to the accounts described above.

16. ColorShock S.R.O., and the other companies involved in the fraud scheme, in turn, engaged in transactions appearing to be legitimate, but were in fact false and fictitious "contract" payments designed to disguise their money laundering. Furthermore, the ColorShock account was opened under an alias to prevent law enforcement from tracing the persons exercising ultimate control over the bank account. The investigation determined that the proceeds of the investment program were never actually used for the intended purposes, but that proceeds were only used to pay "interest" to other investors, was used to return investor's principal, or was transferred to other entities presumably for the ultimate benefit of the co-conspirators operating Profitable Sunrise.

17. Immediately after the Profitable Sunrise website was shut-down by the perpetrators on March 13, 2013, all contact between the investors and the persons running

Profitable Sunrise ceased. Furthermore, the co-conspirators operating Profitable Sunrise failed to pay for the services of the Profitable Sunrise web hosting provider.

HUNGARIAN BANK ACCOUNT USED TO FACILITATE THE FRAUD

18. On March 21, 2013, Hungarian authorities notified FBI agents in Budapest that they believed Hungarian MKB Bank account number 10300002-10552643-48820015, held in the name of ColorShock, of Opletalova, 11000 Prague 1-Nove Mesto, Czech Republic (defendant account), was involved in money laundering. As a result, the account was temporarily restrained.

19. The balance in the defendant account on March 19, 2013, was approximately €8,808,406.13, which amount is the approximate equivalent of \$10,424,001.23 at the current international currency exchange rate.

20. The law enforcement investigation determined that, from February 6, 2013 to February 25, 2013, the defendant account received almost 5,000 incoming wire transfers totaling €8,338,999.86 (approximately \$9,868,498.74), mostly from individuals in the United States. The last incoming wire transfer was received on March 11, 2013. The bank account was a repository for investments in Profitable Sunrise.

21. The listed owner of the defendant account is Petr Sulc of 27711 Neratovice, 1024 Kojeticka, Czech Republic. In addition, a woman identifying herself as Aneta Korbelova, later determined to be Katerina Uzlova (hereinafter referred to as "Uzlova") has signature authority over defendant account.

22. After receiving the funds, MKB Bank received numerous SWIFT messages (international messages exchanged between financial institutions) from the investors' originating banks, requesting that the funds sent to MKB Bank be returned due to fraud.

23. On February 14, 2013, Uzlova, using the alias of Korbelova, attempted to transfer €38,318 (approximately \$45,346.10) from the defendant account to Halltown Business LLP for “textile prof 2013/02.” The transfer was temporarily suspended before being conducted on February 18, 2013. MKB Bank’s investigation determined that ColorShock had a business relationship with Halltown Business LLP, a company registered in the United Kingdom and having a Latvian bank account. Also identified were previous “contracts” between Colorshock and Halltown Business LLP including €5 million (approximately \$5,917,075.73) to Halltown Business LLP for “trousers.” Records obtained from the Latvian bank show that immediately after the funds were received, the exact same amount, €38,318 (approximately \$45,346.10), was transferred to Eversky International Ltd., in Wenzhou, Zhejiang, China.

24. Investigation conducted by the Hungarian Customs and Tax Authority determined that ColorShock S.R.O. has no authority to conduct business in the Czech Republic, nor does ColorShock appear to conduct any legitimate business activity.

25. On March 18, 2013, Uzlova, using the alias of Korbelova, through six separate orders, requested to transfer €10.6 million (approximately \$12,544,200.55) from the defendant account to Eversky International Ltd., address No. 253/Xiao Nanmen, Wenzhou, Zhejiang, China, via the Agricultural Bank of China. MKB Bank requested and received copies of the contracts between ColorShock and Eversky International Ltd. The contracts were dated January 7, 2013 and indicated that a €12 million (approximately \$14,194,447.36) payment was owed by ColorShock due to the purchase of 1.2 million pairs of jeans.

26. Due to the suspected fraud, MKB Bank did not conduct the transfer as requested.

27. On March 22, 2013, Hungarian law enforcement authorities arrested Uzlova for violations of Hungarian law at an MKB Bank branch as she attempted to conduct the transfers described above to China from the defendant ColorShock account.

28. Uzlova's person and car were searched following her arrest. Uzlova was found to be in possession of the signed contract between ColorShock and Eversky International which was provided to MKB Bank in furtherance of the transfers. In addition, Uzlova also had with her an unsigned copy of the same contract. Uzlova possessed eleven cellular telephones and fraudulent letters on the letterhead of Inter Reef Ltd., Aradis International Ltd., and Kalipso Ltd., "requiring" that funds be transferred to a Czech Republic-based bank account held by Fortuna-K S.R.O. The letters requested that the funds be transferred pursuant to an investment contract between Aradis International Ltd. and Fortuna-K S.R.O.

29. At the time of her arrest, Uzlova possessed a false Czech Republic identification document in the name of Aneta Korbelova. This identification matched a photocopy provided with the account opening documents for the MKB Bank ColorShock account. Uzlova was also wearing a wig at the time of her arrest. Upon close examination of the photo on Korbelova's fake identification document, a similar type and color of wig worn by Uzlova on the day of her arrest appears in that photo.

30. The fake identification document in the name of Korbelova reveals that the false identification document bears a photo with the actual image of Uzlova.

31. When Hungarian law enforcement authorities searched Uzlova's car, they found Uzlova's real identification document, containing a photograph of Uzlova, and a visa credit card in the name of Katerina Uzlova.

32. On the date of her arrest, Uzlova was interviewed by Hungarian law enforcement authorities. Uzlova admitted during her interview that she possessed the false identification in the name of Korbelova and admitted her true identity was Katerina Uzlova.

33. Hungarian law enforcement authorities seized the documents and the cellular telephones from Uzlova and her car. These items also connected Uzlova to the Czech Republic business bank accounts which received funds from the Profitable Sunrise investors, as well as sent funds to unknown co-conspirators.

34. Review of the SMS text messages contained on the phones seized from Uzlova established she received and shared information regarding the ColorShock account with unknown co-conspirators using telephone numbers assigned to the Czech Republic. Some of the information shared included the exact amount of the six individual wire transfers of fraud proceeds (totaling €10.6 million, approximately \$12,544,200.55) which were to be sent to China. Also, the phones contained the email addresses associated with ColorShock and the business registration information for ColorShock.

35. Uzlova had in her possession other financial information associated with the fraud, including the bank account number for the Czech Republic Solutions Company business bank account and the telephone numbers for MKB Bank.

36. In mid-March 2013, the co-conspirators responsible for the scheme shut down the website, transferred all the remaining available funds from the accounts that were not yet restrained, and disappeared.

CONSPIRATOR KATERINA UZLOVA'S CRIMINAL CHARGES

37. On July 24, 2013, a grand jury, sitting in the United States District Court for the Northern District of Ohio, issued a two-count sealed indictment in Criminal Case No.

3:13CR356, naming Uzlova as Defendant and charging her with violating 18 U.S.C. § 1956(h), conspiracy to commit money laundering; and 18 U.S.C. §§ 1349 and 1343, conspiracy to commit wire fraud.

38. Based on the crimes charged against Uzlova, the indictment also included a forfeiture specification seeking the forfeiture of any property involved in the offenses, any property traceable to that property, and any property constituting, or derived from any proceeds traceable to the violations of the criminal law by Uzlova. As part of a criminal conviction and sentencing of Uzlova, the forfeiture specification contained in the indictment would result in the forfeiture of the defendant account.

39. Pursuant to this indictment, an arrest warrant was issued by Magistrate Judge Gregory A. White of the United States District Court for the Northern District of Ohio. On January 9, 2015, the District Court for the Northern District of Ohio ordered the unsealing of the indictment for the limited purpose of pursuing this forfeiture case.

40. On September 23, 2013, Uzlova was arrested by Hungarian law enforcement officers pursuant to International Arrest Warrant, No 95-100—22796, which had been issued on the basis of the indictment and the United States' extradition request to Hungary.

41. Uzlova was held in custody in Hungary under provisional arrest for extradition from September 23, 2013, through approximately January 23, 2014. The Budapest Capital Regional Court, sitting in Budapest, Hungary, found that the documents submitted in support of the extradition request were insufficient. Based upon that finding, the court ordered Uzlova to be released from custody. The ruling specifically authorized the United States to resubmit a request for extradition with additional documentation.

42. Upon her release from custody, Hungarian law enforcement officers observed Uzlova cross the international border into Slovakia. To the date of the filing of this complaint, Uzlova has not returned to the Hungary or appeared in the United States to submit to the court's jurisdiction on her criminal charges. Uzlova remains a fugitive from justice.

43. If Uzlova was under the jurisdiction of the United States, she would be prosecuted on the indictment naming her a defendant and upon conviction, the defendant account would be criminally forfeited on the basis of her involvement in criminal activity involving the conspiracy to commit wire fraud and the conspiracy to commit money laundering.

CLAIMS FOR RELIEF

44. Under the laws of the United States, assets that are subject to forfeiture in the criminal case against Uzlova, are also forfeitable under parallel statutes based upon those assets having been involved with violations of the criminal law. When a criminal defendant is a fugitive from justice or otherwise is unavailable for prosecution, the criminal acts alone can serve as a basis for forfeiting the assets under the parallel statutes so that the criminal violations do not go unaddressed and victims may be made whole to the extent possible.

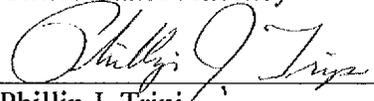
45. By reason of the foregoing, the defendant account is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and (a)(1)(C), because it was involved in one or more money laundering transactions in violation of criminal code 18 U.S.C. § 1956 and because it represents the proceeds of a wire fraud conspiracy in violation of criminal code 18 U.S.C. §§ 1349 and 1343.

46. The United States would seek the execution of any final forfeiture judgment issued by this Court in the country where the property is located, Hungary, pursuant to a mutual legal assistance treaty request.

WHEREFORE, plaintiff prays that this Court enter judgment condemning the defendant account and forfeiting it to the United States of America for disposition according to law, and for such other relief as this Court may deem just and proper.

Respectfully submitted,

STEVEN M. DETTELBACH
United States Attorney

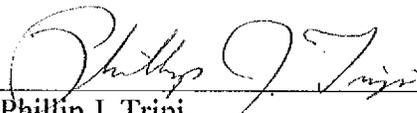
By: 
Phillip J. Tripi

Assistant U.S. Attorney
Reg. No. 0017767
United States Court House
801 West Superior Avenue
Suite 400
Cleveland, OH 44113
Phone: (216) 622-3769
Fax: (216)522-7499

VERIFICATION

STATE OF OHIO)
) SS.
COUNTY OF CUYAHOGA)

I, Phillip J. Tripi, being first duly sworn, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and one of the attorneys for the Plaintiff in this action. Under penalty of perjury I depose and say the foregoing Complaint in Forfeiture is based upon information officially provided to me and is true as I verily believe.


Phillip J. Tripi
Assistant U.S. Attorney

Sworn to and subscribed in my presence this 14th day of January, 2015.


Notary Public

DANIEL R. RANKE, Attorney At Law
Notary Public - State of Ohio
My commission has no expiration date.
Section 147.03 O. R. C.

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

3:15 CV 84

I. (a) PLAINTIFFS
 United States of America

2015 JAN 14 PM 1:00

(b) County of Residence of First Listed Plaintiff
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
 Phillip J. Tripi, Assistant U.S. Attorney
 400 U.S. Court House; 801 West Superior Avenue
 Cleveland, Ohio 44113 (216) 622-3769

DEFENDANTS
 All Funds Contained in Account Number
 10300002-10552643-48820015, Held in the Name of ColorShock
 S.R.O., at MKB Bank Zrt. in Budapest, Hungary

County of Residence of First Listed Defendant **Williams**
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

Attorneys (If Known) **JUDGE KATZ**
MAG. JUDGE JAMES R. KNEPP II

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

2 U.S. Government Defendant

3 Federal Question (U.S. Government Not a Party)

4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input checked="" type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
			IMMIGRATION		
			<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions		

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding

2 Removed from State Court

3 Remanded from Appellate Court

4 Reinstated or Reopened

5 Transferred from Another District (specify)

6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 Civil Forfeiture Action Pursuant to 18 U.S.C. § 981

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE **Jeffrey S. Helmick** DOCKET NUMBER **3:13CR356**

DATE **01/14/2015** SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

I. Civil Categories: (Please check one category only).

- 1. General Civil
- 2. Administrative Review/Social Security
- 3. Habeas Corpus Death Penalty

*If under Title 28, §2255, name the SENTENCING JUDGE: _____

CASE NUMBER: _____

II. **RELATED OR REFILED CASES.** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action is RELATED to another PENDING civil case. This action is REFILED pursuant to LR 3.1.

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III. In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant.** If the defendant resides in a county within this district, please set forth the name of such county

COUNTY: Williams

Corporation For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant.** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

COUNTY:

(3) **Other Cases.** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

COUNTY:

IV. The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

EASTERN DIVISION

AKRON

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)

CLEVELAND

(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake, Lorain, Medina and Richland)

YOUNGSTOWN

(Counties: Columbiana, Mahoning and Trumbull)

WESTERN DIVISION

TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry, Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca VanWert, Williams, Wood and Wyandot)