

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
THREE HUNDRED THREE VIRTUAL)	
CURRENCY ACCOUNTS,)	
)	Civil Action No. 20-cv-712
THE DARKSCANDALS.COM DOMAIN,)	
)	
-- and --)	
)	
THE DARKSCANDALS.CO DOMAIN,)	
)	
)	
Defendants.)	
_____)	

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

COMES NOW, Plaintiff the United States of America, by and through the United States Attorney for the District of Columbia, and brings this Verified Complaint for Forfeiture *In Rem* against the defendant properties, namely: 303 virtual currency accounts, the darkscandals.com domain, and the darkscandals.co domain (collectively, the “Defendant Properties”), which are listed in Attachment A. The United States alleges as follows in accordance with Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions:

THE DEFENDANT PROPERTIES

1. The Defendant Properties are comprised of miscellaneous financial instruments in 303 virtual currency exchange accounts at eight different virtual currency exchanges (listed below), and two domain names: darkscandals.com and darkscandals.co.

NATURE OF ACTION AND THE DEFENDANTS *IN REM*

2. This case involves an international investigation of a website called DarkScandals, which was available on the darknet (“DarkScandals Darknet”) and the clearnet (“DarkScandals Clearnet”) (collectively the “DarkScandals Sites”). The DarkScandals Darknet and DarkScandals Clearnet sites were virtually identical and largely offered the same service: directing customers on how to obtain obscene content, including videos that depicted sexual assault and child pornography.

3. DarkScandals Sites users and the site administrator knowingly and willfully conspired with others, and acted individually, to commit the following violations: Laundering Monetary Instruments, in violation of 18 U.S.C. § 1956(a)(2), Distribution and Receipt of Child Pornography in violation of 18 U.S.C. § 2252(a)(2), Possession of Child Pornography in violation of 18 U.S.C. § 2252(a)(4)(A), Access with Intent to View Child Pornography in violation of 18 U.S.C. § 2252(a)(4)(B), Transportation of Obscene Matters for Sale or Distribution in violation of 18 U.S.C. § 1465, and Engaging in the Business of Selling or Transferring Obscene Matter in violation of 18 U.S.C. § 1465.

4. The Defendant Properties are subject to forfeiture pursuant to 18 U.S.C. §§ 1467 and 2254, as property used or intended to be used to commit or to promote the commission of the above child pornography and obscenity offenses, and/or property traceable to such offenses. The Defendant Properties are also subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as property involved in, or traceable to, a financial transaction in violation of 18 U.S.C. § 1956.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355. These statutes confer original jurisdiction to district courts of all civil actions, suits, or proceedings

commenced by the United States and any action for the forfeiture of property incurred under any act of Congress.

6. Venue is proper pursuant to 28 U.S.C. § 1355(b)(1)(A) and 28 U.S.C. § 1395(c).

FACTS GIVING RISE TO FORFEITURE

I. Definition of Terms

Child Pornography Terms

7. Child pornography as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

8. Minor as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

9. Sexually explicit conduct as defined in 18 U.S.C. § 2256(2), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person.

Tor

10. Tor is a computer network designed to facilitate anonymous communication over the Internet. The Tor network does this by routing a user's communications through a globally distributed network of relay computers (or proxies), rendering conventional Internet Protocol

(“IP”) address-based methods of identifying users ineffective. To access the Tor network, a user must install Tor software either by downloading an add-on to the user’s web browser or by downloading the free “Tor browser bundle,” which is available at www.torproject.org. When a Tor user accesses a website, only the IP address of the last relay computer (the “exit node”), as opposed to the user’s actual IP address, appears on the website’s IP address log. Currently, there is no practical method to trace a user’s actual IP address back through those Tor relay computers.

Bitcoin and Ethereum

11. Bitcoin (BTC) and Ether (ETH) are pseudonymous virtual currencies. Although transactions are visible on a public ledger, each transaction is referenced by a complex series of numbers and letters (as opposed to identifiable individuals) involved in the transaction. The public ledger containing this series of numbers and letters is called a blockchain. This feature makes BTC and ETH pseudonymous; however, it is often possible to determine the identity of an individual involved in BTC and ETH transactions through several different tools. For this reason, many criminal actors who use BTC and ETH to facilitate illicit transactions online (*e.g.*, to buy and sell drugs or other illegal items or services) look for ways to make their transactions even more anonymous.

12. BTC/ETH were not issued by any government, bank, or company, but rather were controlled through computer software.

13. BTC/ETH fluctuated in value. As of March 5, 2020: one BTC was worth approximately \$9,102.65, and one ETH was worth approximately \$232.41.

14. BTC/ETH addresses are unique tokens; however, BTC/ETH are designed such that one person may easily operate many such accounts. Like an email address, a user can send and receive BTC/ETH with others by sending BTC/ETH to a BTC/ETH address. People commonly

have many different addresses, and an individual could theoretically use a unique address for every transaction in which they engage.

15. To spend BTC/ETH held within a BTC/ETH address, the user must have a private key, which is generated when the BTC/ETH address is created. Similar to a password, a private key is shared only with the BTC/ETH-address key's initiator and ensures secured access to the virtual currency. Consequently, only the holder of a private key for a BTC/ETH address can spend BTC/ETH from the address. A BTC user can also spend from multiple BTC addresses in one transaction; for example, five addresses each holding five BTC can collectively send 25 BTC in a single transaction.

16. Although generally the owners of BTC/ETH addresses are not known unless the information is made public by the owner (for example, by posting the address in an online forum or providing the BTC/ETH address to another user for a transaction), analyzing the public transaction ledger can sometimes lead to identifying both the owner of an address and any other accounts that the person or entity owns and controls.

17. BTC/ETH are often transacted using a virtual currency exchange, which is a virtual currency trading and storage platform. An exchange typically allows trading between the U.S. dollar, other foreign currencies, BTC, ETH, and other virtual currencies. Many virtual currency exchanges also store their customers' virtual currencies. These exchanges act as money services businesses and are legally required to conduct due diligence of their customers and have anti-money laundering checks in place. Virtual currency exchanges doing business in the United States are regulated under the Bank Secrecy Act, codified at 31 U.S.C. § 5311 *et seq.*, and must collect identifying information of their customers and verify their clients' identities.

18. Once the sender's transaction announcement was verified, the transaction was added to the blockchain.

19. The blockchain was a decentralized, public ledger that logged every BTC/ETH transaction.

20. Law enforcement can identify the owner of a particular BTC/ETH address by analyzing the blockchain. The analysis can also reveal additional addresses controlled by the same individual or entity. For example, a user or business may create many BTC addresses to receive payments from different customers. When the user wants to transact the BTC that it has received (for example, to exchange BTC for other currency or to purchase goods or services), it may group those addresses together to send a single transaction. Law enforcement uses commercial services offered by several different blockchain-analysis companies to investigate virtual currency transactions. These companies analyze the blockchain and attempt to identify the individuals or groups involved in the virtual currency transactions. Specifically, these companies create large databases that group transactions into "clusters" through analysis of data underlying the virtual currency transactions.

21. Darknet markets are typically commercial websites operating as hidden services using Tor, which primarily function as black markets in which users engage in selling or brokering transactions involving products, such as drugs, unlicensed pharmaceuticals, cyber-arms, weapons, counterfeit currency, stolen credit-card details, forged documents, or, as pertinent to the instant investigation, obscene materials, including child pornography. BTC is one of the most common methods of payment for products or services bought and sold within darknet markets.

22. A "clearnet" website is accessible using traditional Internet browsers, such as Internet Explorer or Safari. These websites use traditional designations, such as ".com" or ".co."

Obscenity

23. In *Miller v. California*, 413 U.S. 15 (1973), the Supreme Court set forth the following test to determine if material is obscene:

- a. Based on contemporary community standards, whether the work taken as a whole, appeals to the prurient interest;
- b. Based on contemporary community standards, whether the work depicts sexual conduct in a patently offensive manner; and
- c. Whether the material, taken as a whole, lacks serious artistic, literary, scientific or political value.

24. The government's allegations as to obscenity in this complaint are directed at videos and other materials depicting: (a) minors engaging in sexually explicit conduct; and/or (b) sexual acts, as defined by D.C. code, with non-consenting victims.

II. The DarkScandals Sites

25. The DarkScandals Sites, which began operating in or about 2012, advertised "real blackmail, rape and forced videos of girls all around the world."

26. The DarkScandals Sites videos featured close-up frames of repeated nonconsensual vaginal and anal penetration of adult and minor female victims.

27. The DarkScandals Sites offered users two ways to access content, which was delivered in "packs." Users could either:

- a. pay for the packs; or
- b. upload new videos, which Mohammad curated, and receive the packs for free.

28. The DarkScandals Sites advertised that the packs contained approximately 2,000 videos and images.

Uploading Content to the DarkScandals Sites

29. The DarkScandals Sites included specific rules for the video uploads to the DarkScandals Sites, including the following:

- “Videos with real rape/forced (agains [sic] will)”
- “Videos with real blackmail (would be better with chatlog)”
- “Real groped girls (not acted videos) (extreme kind)”
- “real busted girl doing some nasty stuff (like busted sex with animal or something extreme)”
- “real underground sold slave girl videos”
- “This video can not be found on other (easily) accessible sites”
- “Your video is not already in the pack”
- “Only videos with face (of girl) in it will be accepted”
- “We prefer own made material (if you have some material where you are also on it, and you want yourself out of the video, send the original, we will edit it how you want it and put it in the packs)”
- “Please do NOT send videos with dead stuff, fake, amateur, masturbation or acted movies!”

30. The DarkScandals Sites advertised three different anonymous data-transfer services (which allow users to store and share files without providing any identifying information to the service) to receive uploads of customer’s obscene content.

31. The DarkScandals Sites’ administrator rejected uploads if the videos were inconsistent with the obscene content on the site or were already in the packs. For example, on or about December 1, 2013, the administrator informed a customer that the administrator had rejected

the customer's uploaded video because "its [sic] just acted, we don't accept video's [sic] like that for the packs." The administrator signed this email as "Dark," which was one of his online monikers.

Payments to Access the DarkScandals Sites' Content

32. Prior to in or about November 2013, the DarkScandals Sites directed users to transfer fiat currency to an account associated with the site.

33. In or about November 2013, the DarkScandals Sites began directing customers to send payments of BTC to 1Fiptr7bQdh6754yWzfmuytEe6ekihZ8V6 (the "1Fiptr address") to access the obscene content. Mohammad created the 1Fiptr address.

34. The DarkScandals Sites subsequently directed payments to the following addresses:

- a. Bitcoin address: 12kQwWjBkxHjRmCQBKjReAERu9SnzU6u8Y;
- b. Bitcoin address: 1MFrsV3Y6n8qDW7CHVJMeLbkEqyhvPvurA ("the 1MFrs address"); and
- c. Ethereum address: 0x1c57BAC4757a8D46131776eA52706F4d3eb00fd ("the 0x1c5 address").

35. The DarkScandals Sites instructed customers to send proof of their BTC/ETH payments to an encrypted email address provided on the DarkScandals Sites.

36. Some customers would instead send BTC/ETH payments to this encrypted email address.

37. In total, the DarkScandals Sites received at least approximately 1,650 deposits totaling 188.6631 BTC (approximately valued, as of March 1, 2020, at \$1.6 million) and 26.724 ETH (approximately valued at \$5,730.96).

Present Investigation into the DarkScandals Sites

38. Welcome to Video was a darknet site that was exclusively dedicated to the distribution of child pornography videos.

39. During the course of the Welcome to Video investigation, investigators traced the payment of bitcoin from Welcome to Video customers to that site. A subsequent review of a Washington, D.C.-based Welcome to Video customer's virtual currency records lead to the discovery of the DarkScandals Sites. Specifically, the D.C.-based customer made a payment of 0.15 BTC to the DarkScandals Sites on or about March 26, 2016.

Undercover Payments

40. On or about February 13, 2018, law enforcement, acting in an undercover capacity, sent 0.0197777 BTC (\$25.27) to the 1Fiptr address.

41. On April 20, 2018, law enforcement, acting in an undercover capacity in Washington, D.C., clicked on a download link in an email from "bitcoin@darkscandals.com," which email was hosted by an anonymous service provider that was located in Germany.

42. A review of the content downloaded by law enforcement in Washington, D.C., revealed that the DarkScandals Sites were distributing child sexual exploitation material (that is, child pornography) and obscene material, such as:

- a. a video titled "pinkRusband.avi," which was identified by the National Center for Missing and Exploited Children as depicting a 14-year-old girl who was extorted into filming herself engaged in sexually explicit conduct. Specifically, the minor, while in front of her computer's web camera, exposed and rubbed her genitalia and subsequently penetrated her vagina with her fingers.

- b. a video titled “Sierra_Blackmail_Video.avi,” which was identified by the National Center for Missing and Exploited Children as depicting a child who was between the ages of 14 and 17 years old during the time that she was extorted into filming herself engaged in sexually explicit conduct. Specifically, the minor, who appeared to be closer to 14 years old at the time of the video, exposed and touched her genitalia and subsequently penetrated her vagina with a pink pencil while in front of her computer’s web camera.
- c. a video titled “the regret of a analwhore.avi,” which depicted a woman purportedly consenting to anal sex but then indicating her desire to stop. The man refused and forced anal sex as the woman screamed in pain and pled with him to stop.
- d. a video titled “stick rape.mp4,” which depicted an unconscious and unmoving woman being vaginally penetrated with both ends of a baseball bat and causing injury to the woman’s genitalia; and
- e. a video titled “Drunk_passed_out_girl_violated_with_bottle.3gp,” which depicted an unconscious and unmoving woman being vaginally penetrated with a vodka bottle while the camera zoomed in on the act of penetration.

43. On or about March 2, 2020, law enforcement, acting in an undercover capacity while in Washington D.C., sent 0.021269 BTC (\$189.27) to the 1MFr’s address associated with the DarkScandals Sites. As noted above, the 1MFr’s address was among those to which the DarkScandals Sites directed users that they could make payments.

DarkScandals Clearnet Sites

44. As noted above, the DarkScandals Clearnet Site has been in operation since 2012. During the majority of that time, the DarkScandals Clearnet Site was found on darkscandals.com.

45. On or about April 3, 2018, the administrator of the site received a warning that the content on DarkScandals Clearnet Site contained “violence and rape” and was asked to remove it. The specifically identified videos were:

- i. “moslim-girl-raped-while-filmed-by-friend”
- ii. “indian-girl-raped-while-crying”
- iii. “crying-girl-stripped-and-gangrapped”
- iv. “indian-girl-raped-outside”

46. In or about February 2019, the DarkScandals Clearnet Site transitioned from darkscandals.com to darkscandals.co.

47. On or about February 5, 2019, Mohammad made a payment into the United States for the hosting service used for darkscandals.co. Mohammad previously made payments into the United States to maintain darkscandals.com.

III. BITCOIN EXCHANGE ACCOUNTS

48. Analyzing the blockchain revealed that many of the payments to the DarkScandals Sites came from accounts hosted at eight virtual currency companies offering BTC/ETH wallet services.

49. Law enforcement observed numerous payments from these accounts to other darknet markets, which were flagged by blockchain analytics companies, enabling law enforcement to identify illicit transaction.

50. Each of the virtual currency accounts listed below, which comprise a portion of the defendant properties made at least one payment to the DarkScandals Sites:

Defendant Property	Exchange	user_id
1	Virtual Currency Exchange 1	558e16e5363837151b000027
2	Virtual Currency Exchange 1	568298190b8e897101000124
3	Virtual Currency Exchange 1	5302e6e7449d505a5400002a
4	Virtual Currency Exchange 1	55745f34cc676870bd00004e
5	Virtual Currency Exchange 1	550ff0583f843880c2000035
6	Virtual Currency Exchange 1	541278fe22b29dbfeb000012
7	Virtual Currency Exchange 1	55dab7eac40258006b00017f
8	Virtual Currency Exchange 1	5549232546e0a511f50000ca
9	Virtual Currency Exchange 1	55f159c52289a00cdd000058
10	Virtual Currency Exchange 1	55027a911a9cdbf7db000024
11	Virtual Currency Exchange 1	53fead7d572685dd24000006
12	Virtual Currency Exchange 1	52c9a111ee3bf3461a000008
13	Virtual Currency Exchange 1	52a8bc9793de025f6500018c
14	Virtual Currency Exchange 1	56d0f02b6d5c5f7f4000021e
15	Virtual Currency Exchange 1	529df8ecea41f22afc000498
16	Virtual Currency Exchange 1	5a3358979243c2023388f81c
17	Virtual Currency Exchange 1	564c56ac3c5410677700019f
18	Virtual Currency Exchange 1	55c17d64c90f890060000046
19	Virtual Currency Exchange 1	56b91cbcacbf43005f0001f4
20	Virtual Currency Exchange 1	5a181c6334fff4032d61464f
21	Virtual Currency Exchange 1	5b4016f389f8400d3000dff5

22	Virtual Currency Exchange 1	5b5fb3d995d4080cd2f96fd4
23	Virtual Currency Exchange 1	59f45d913bfa9c00ce813123
24	Virtual Currency Exchange 1	56d0c11e39f7d75db70000b2
25	Virtual Currency Exchange 1	5aa209bd0c9fc801218b953a
26	Virtual Currency Exchange 1	5bcc6fbbb9561f16f8e156f3
27	Virtual Currency Exchange 1	55f1718c2289a067b50001fa
28	Virtual Currency Exchange 1	54f32ba5c721436ef500000f
29	Virtual Currency Exchange 1	55f399244cf370007b00012a
30	Virtual Currency Exchange 1	545340e0a0313b8d86000003
31	Virtual Currency Exchange 1	5601663f198c175dbe0001e3
32	Virtual Currency Exchange 1	53e5480f658c07cfc5000001
33	Virtual Currency Exchange 1	58d101fa1604c03352151f63
34	Virtual Currency Exchange 1	5974781a99672502ea2931e1
35	Virtual Currency Exchange 1	569aa592f0f6a74e2e000090
36	Virtual Currency Exchange 1	56632fd04f694f3e2e000143
37	Virtual Currency Exchange 1	587ace1a409f9f1467a24a82
38	Virtual Currency Exchange 1	5a3d6b485e7ac0045ef4cb10
39	Virtual Currency Exchange 1	533f375093f607d85f00000b
40	Virtual Currency Exchange 1	537b768b40925c27de000033
41	Virtual Currency Exchange 1	56671e8433253e462f000015
42	Virtual Currency Exchange 1	5a3991d6a4c422058d6e8df6
43	Virtual Currency Exchange 1	54cca4298d4cd905c900004b

44	Virtual Currency Exchange 1	554e7ead7787e846ba0000bf
45	Virtual Currency Exchange 1	53016a2a49b4948e6800019e
46	Virtual Currency Exchange 1	529b74a7b1bcfb3f9a000664
47	Virtual Currency Exchange 1	5664e29bee1de106cb0001a9
48	Virtual Currency Exchange 1	52d2307aefb168c14d0000da
49	Virtual Currency Exchange 1	54f6ff75d15c27d99d000011
50	Virtual Currency Exchange 1	53ed8a2293a2d2e090000007
51	Virtual Currency Exchange 1	56797107c8ec600b0d0001aa
52	Virtual Currency Exchange 1	56797107c8ec600b0d0001aa
53	Virtual Currency Exchange 1	5b38421b1d157601a3a0c8e9
54	Virtual Currency Exchange 1	56797107c8ec600b0d0001aa
55	Virtual Currency Exchange 1	56797107c8ec600b0d0001aa
56	Virtual Currency Exchange 1	5935a21a05fcbc058a0a2483
57	Virtual Currency Exchange 1	51c3288dd3c2c7725d000001
58	Virtual Currency Exchange 1	5ae2fa5e2d553914b98b68ca
59	Virtual Currency Exchange 1	548568fc236e23ce1400004d
60	Virtual Currency Exchange 1	5ae39ef23092a21ade0aa8c5
61	Virtual Currency Exchange 1	5aad155229c59a0135b8e808
62	Virtual Currency Exchange 1	5a92023b293bd7014d014535
63	Virtual Currency Exchange 1	59233b60a271ba0f4d41db90
64	Virtual Currency Exchange 1	59dd9cf5e3efdb00eaa5db29
65	Virtual Currency Exchange 1	57599e6ce17648390a000eec
66	Virtual Currency Exchange 1	51bb93a3c906698f0100006a

67	Virtual Currency Exchange 1	55bbe402825639008700001d
68	Virtual Currency Exchange 1	54cbf37394932567d900006d
69	Virtual Currency Exchange 1	5599527f65353921d100011e
70	Virtual Currency Exchange 1	5599527f65353921d100011e
71	Virtual Currency Exchange 1	5599527f65353921d100011e
72	Virtual Currency Exchange 1	5599527f65353921d100011e
73	Virtual Currency Exchange 1	59d854ad13812f010a274f89
74	Virtual Currency Exchange 1	5ae248a5fff74113dc9927de
75	Virtual Currency Exchange 1	555cf7198c4b8c20c10000a1
76	Virtual Currency Exchange 1	550fa32352d1f52aa50000b7
77	Virtual Currency Exchange 1	5b89b0da17fd89017779fb2b
78	Virtual Currency Exchange 1	5b81095d7d9bb70626af9ce0
79	Virtual Currency Exchange 1	59a87ba3d0190f00b2383556
80	Virtual Currency Exchange 1	5b0ccb82d8139a01247e419b
81	Virtual Currency Exchange 1	5639e47a33fcbd7dfe0001d9
82	Virtual Currency Exchange 1	551b97f8e17ed034a8000079
83	Virtual Currency Exchange 1	5a4967d77df36a0188136b5f
84	Virtual Currency Exchange 1	5509fbc2863a1247880000f9
85	Virtual Currency Exchange 1	53d28e32c10c6f7450000001
86	Virtual Currency Exchange 1	57b34bf087903519c4c96784
87	Virtual Currency Exchange 1	508b4a45de349002000000cb
88	Virtual Currency Exchange 1	540bd4bb9933e5a304000001

89	Virtual Currency Exchange 1	52a2a0559c7abe4e3100002b
90	Virtual Currency Exchange 1	52f594447c1e8a9daf000036
91	Virtual Currency Exchange 1	568e285a705bf2503a000064
92	Virtual Currency Exchange 1	57a0d8d8788c9e01bbb14fa3
93	Virtual Currency Exchange 1	598f3401f9702e01e54fe05f
94	Virtual Currency Exchange 1	5a463fed752770016c696a93
95	Virtual Currency Exchange 1	5690cfd02e2329179d000088
96	Virtual Currency Exchange 1	53715b923296fe82cd000021
97	Virtual Currency Exchange 1	598cb921eab24f02b0b61dfa
98	Virtual Currency Exchange 1	5958f8a6dacf4d02cb917fdc
99	Virtual Currency Exchange 1	5b5c37a43c34e905cefb2e46
100	Virtual Currency Exchange 1	5b70c46db8343b0901ab00ca
101	Virtual Currency Exchange 1	524244ad7c2431a41b00002e
102	Virtual Currency Exchange 1	54ac2d321619f9c6b700004e
103	Virtual Currency Exchange 1	556e5c70eafa71d347000043
104	Virtual Currency Exchange 1	562e6224b65638494e0001af
105	Virtual Currency Exchange 1	598e578f797a74023a25001a
106	Virtual Currency Exchange 1	59965fd4ed8367008b6043b9
107	Virtual Currency Exchange 1	5a6f986bf5a7e501f5390e26
108	Virtual Currency Exchange 1	51186be502e7629a4f00001e
109	Virtual Currency Exchange 1	518876b84d4722924a000015
110	Virtual Currency Exchange 1	51c726354b064ba592000012
111	Virtual Currency Exchange 1	525c48cbcd5c496a4b000094

112	Virtual Currency Exchange 1	525e6ccc33099c8442000049
113	Virtual Currency Exchange 1	5286467880bd4efaa3000004
114	Virtual Currency Exchange 1	5292620a9ab9f1d582000308
115	Virtual Currency Exchange 1	52943c08fbc3b08a50000033
116	Virtual Currency Exchange 1	5296c73f5cd2f16ba600024d
117	Virtual Currency Exchange 1	5297f3c37ed21e3e2a00017b
118	Virtual Currency Exchange 1	52a0cbd2e59e48bd420004a6
119	Virtual Currency Exchange 1	52c0dacfec727df7d400001f
120	Virtual Currency Exchange 1	52cf2d560ff63cb6000000d8
121	Virtual Currency Exchange 1	52e0bdae18d19e558b000062
122	Virtual Currency Exchange 1	52e70c7a48b5ab8ced000005
123	Virtual Currency Exchange 1	52f3b695c3d9558175000030
124	Virtual Currency Exchange 1	530f680da334afcb380000f0
125	Virtual Currency Exchange 1	532563b24a980c8d1c000180
126	Virtual Currency Exchange 1	533bc721767338ee69000111
127	Virtual Currency Exchange 1	535ecfe0fb43fdf02800002b
128	Virtual Currency Exchange 1	53652dcb39d3c5bd9d00003e
129	Virtual Currency Exchange 1	53665ffa4c0f4b1641000047
130	Virtual Currency Exchange 1	539dc104763a3eedeb000016
131	Virtual Currency Exchange 1	53a5d10a5fc9b845f3000003
132	Virtual Currency Exchange 1	53b5b4a5d78d955399000001
133	Virtual Currency Exchange 1	53bb9990764901abe6000012
134	Virtual Currency Exchange 1	53bf083ecc7ce900d1000022

135	Virtual Currency Exchange 1	53c3441f7714f0c301000007
136	Virtual Currency Exchange 1	53c4bc1c8fced0657400000e
137	Virtual Currency Exchange 1	53dc5aae8508ab531400000d
138	Virtual Currency Exchange 1	540caeb4c544ef85c0000003
139	Virtual Currency Exchange 1	54274f7273f0cbc390000005
140	Virtual Currency Exchange 1	543ab378b89d00cfb8000001
141	Virtual Currency Exchange 1	543ef47cb82ece2950000001
142	Virtual Currency Exchange 1	545ee4746798bc9cff000001
143	Virtual Currency Exchange 1	54963153db84fbf79600016f
144	Virtual Currency Exchange 1	54b6c77587df323da100005f
145	Virtual Currency Exchange 1	54bbe85f06851c5db70000a8
146	Virtual Currency Exchange 1	54d22df5eb63662fd1000050
147	Virtual Currency Exchange 1	54fdc571823860bdf50000a5
148	Virtual Currency Exchange 1	5505ce4f0ff52fd3d9000011
149	Virtual Currency Exchange 1	5513e999b9d0fbaa7a000061
150	Virtual Currency Exchange 1	551a1be9c3e11a5abc000063
151	Virtual Currency Exchange 1	553f4bee990ebe27f00000b9
152	Virtual Currency Exchange 1	55426ec7e0ab5adc4f000018
153	Virtual Currency Exchange 1	5545889b27c860d550000100
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215	Virtual Currency Exchange 2	106055 – xxspaldingxx
216	Virtual Currency Exchange 2	123341 – DarkBaal
217	Virtual Currency Exchange 2	166032 - cheese1337
218	Virtual Currency Exchange 2	176981 – Imperanon
219	Virtual Currency Exchange 2	177328 - kite859
220	Virtual Currency Exchange 2	204233 - Netzwerk1981
221	Virtual Currency Exchange 2	204419 - deus1983
222	Virtual Currency Exchange 2	250379 - Tomo33
223	Virtual Currency Exchange 2	250409 – Trottiminator
224	Virtual Currency Exchange 2	301554 - Rene686
225	Virtual Currency Exchange 2	309830 – Loflend

226	Virtual Currency Exchange 2	327540 – mwewer
227	Virtual Currency Exchange 2	375436 - 94sim
228	Virtual Currency Exchange 2	284880
229	Virtual Currency Exchange 2	172792 - brummi92
230	Virtual Currency Exchange 2	186150 - Matt1987ba
231	Virtual Currency Exchange 2	190926 – Lambada
232	Virtual Currency Exchange 2	193989 - overdrive82
233	Virtual Currency Exchange 2	206759 – Brechter
234	Virtual Currency Exchange 2	213391 - Marcelg95
235	Virtual Currency Exchange 2	236892 – KellersMarwin
236	Virtual Currency Exchange 2	236950 - bommi2603
237	Virtual Currency Exchange 2	255156 – fortunate
238	Virtual Currency Exchange 2	281880 - mueller-40219
239	Virtual Currency Exchange 2	288066 – Newtiger
240	Virtual Currency Exchange 2	305313 - juanpablo30
241	Virtual Currency Exchange 2	317981 – Mitsunaga
242	Virtual Currency Exchange 2	328279 – kawamatze
243	Virtual Currency Exchange 2	33968 - franco666
244	Virtual Currency Exchange 2	347313 – XsiVXsi
245	Virtual Currency Exchange 2	376780 – springs
246	Virtual Currency Exchange 2	63502 – Nermin
247	Virtual Currency Exchange 2	742654 - slider478
248	Virtual Currency Exchange 2	75911 – duckbill

249	Virtual Currency Exchange 2	91353 - Wayne333
250	Virtual Currency Exchange 2	93021 - basti146
251	Virtual Currency Exchange 3	620949
252	Virtual Currency Exchange 4	up106412635
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285	Virtual Currency Exchange 7	37157433
286	Virtual Currency Exchange 7	38793754
287	Virtual Currency Exchange 7	44134631
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289	Virtual Currency Exchange 8	12102200
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291	Virtual Currency Exchange 8	26890829
292	Virtual Currency Exchange 8	11696772
293	Virtual Currency Exchange 8	12550601
294	Virtual Currency Exchange 8	17675089

295	Virtual Currency Exchange 8	13561682
296	Virtual Currency Exchange 8	12868285
297	Virtual Currency Exchange 8	16587211
298	Virtual Currency Exchange 8	13606900
299	Virtual Currency Exchange 8	26260205
300	Virtual Currency Exchange 8	12686075
301	Virtual Currency Exchange 8	35709480
302	Virtual Currency Exchange 8	13220867
303	Virtual Currency Exchange 8	18518130

51. Many of the above accounts appear to have been solely opened and used to launder funds to the DarkScandals Sites. For example:

- b. Defendant Property 2 purchased BTC on or about December 29, 2015 and on or about January 5, 2016 and then shortly thereafter sent 0.15 BTC (\$64.98 USD) to the DarkScandals Site's 1Fiptr BTC address. This appeared to be the only payment activity from this account.
- c. Defendant Property 12 purchased 0.18662021 BTC (\$70.19) on or about February 11, 2016, and on or about that same date, this account sent 0.15 BTC (\$56.44) to the DarkScandals Site's 1Fiptr BTC address. This appeared to be the only payment activity from this account.
- d. Defendant Property 25 was created on or about March 8, 2018, was funded approximately 25 minutes later, and then sent .0196 BTC (\$171.17) to the DarkScandals Site's 1Fiptr BTC address approximately an hour later. The notes field on the transaction included a reference to a privacy based-email service,

presumably to provide an address to which Mohammad could send the DarkScandals pack. This appeared to be the only payment activity from this account.

- e. Defendant Property 26 purchased BTC on or about November 4, 2018 and then made a payment of 0.007983 BTC (\$77.10 USD) DarkScandals Site's 1Fiptr BTC address on or about the same day. This appeared to be the only payment activity from this account.
- f. Defendant Property 215 made two payments to the DarkScandals Site's 1Fiptr BTC address. This appeared to be the only payment activity from this account.
- g. Defendant Property 219 sent 0.198 BTC (\$75) to the DarkScandals Site's 1Fiptr BTC address on or about May 20, 2014. This appeared to be the only payment activity from this account.
- h. Defendant Property 227 sent two payments totaling 0.0154 BTC (\$90) to the DarkScandals Site's 1Fiptr BTC address on or about October 17, 2017.

52. As noted above, many accounts that did have other payment activity had transactions with known illicit darknet sites. For example:

- i. Defendant Property 3 made four payments between 2015 and 2016 to the following darknet markets that sold drugs, stolen information, and other illicit products: Agora Darknet Market and Nucleus Darknet Market. Defendant 3 sent 0.22084473 BTC (\$87.01 USD) to the DarkScandals Site's 1Fiptr BTC address on or about February 29, 2016.
- j. Defendant Property 11 made one payment to the following darknet market that sold drugs, stolen information, and other illicit products: SilkRoad 2 Market. Defendant

11 sent 0.15 BTC (\$72) to the DarkScandals Site's 1Fiptr BTC address on or about September 5, 2014. The payment memo included a reference to the user's email address, presumably to provide an address to which Mohammad could send the DarkScandals pack.

- k. Defendant Property 12 received 0.259 BTC (\$64.20) on or about March 30, 2015 to the following darknet market that sold drugs, stolen information, and other illicit products: Black Bank Market. Defendant Property 12 sent 0.15 BTC (\$56.44) to the DarkScandals Site's 1Fiptr BTC address on or about February 11, 2016.
- l. Defendant Property 27 sent .4 BTC (\$92.50) on or about September 13, 2015 to the following darknet market that sold drugs, stolen information, and other illicit products: Dream Market; and sent BTC on three occasions to Welcome to Video, a darknet market that exclusively sold child pornography. Defendant Property 27 sent 0.15 BTC (\$56.44) to the DarkScandals Site's 1Fiptr BTC address on or about November 25, 2015.
- m. Defendant Property 217 sent BTC to the following darknet market that sold drugs, stolen information, and other illicit products: Pandora Darknet Market. Defendant Property 217 sent BTC on two occasions to the DarkScandals Site's 1Fiptr BTC address.
- n. Defendant Property 220 sent BTC to the following darknet market that sold drugs, stolen information, and other illicit products: AlphaBay. Defendant Property 220 sent 0.15 BTC (\$72) to the DarkScandals Site's 1Fiptr BTC address on or about December 30, 2016.

- o. Defendant Property 222 sent BTC to the following darknet market that sold drugs, stolen information, and other illicit products: Green Road Market; and sent BTC on one occasion to Welcome to Video, a darknet market that exclusively sold child pornography. Defendant Property 222 sent 0.1001 BTC (\$69) to the DarkScandals Site's 1Fiptr BTC address on or about November 2, 2016.

53. Many of the above accounts were opened with either false or no “know your customer” (KYC) documents. Persons engaging in illegal online activities frequently open accounts at virtual currency exchanges with no/fake KYC records as a way to conceal their true identity. As an example here, the following accounts provided incomplete/invalid KYC records: Defendant Property 5; Defendant Property 24; Defendant Property 27; Defendant Property 28; Defendant Property 29; Defendant Property 263; Defendant Property 269; Defendant Property 284; Defendant Property 285; Defendant Property 289; Defendant Property 292; Defendant Property 293; Defendant Property 299; Defendant Property 301; and Defendant Property 302.

FIRST CLAIM FOR RELIEF
(18 U.S.C. § 2254)

54. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 53 above as if fully set forth herein.

55. The Defendant Properties were property, real or personal, used or intended to be used to commit or to promote the commission of violations of 18 U.S.C. § 2252, and/or property traceable to such property.

56. As such, the Defendant Properties are subject to forfeiture pursuant to 18 U.S.C. § 2254.

SECOND CLAIM FOR RELIEF
(18 U.S.C. § 1467)

57. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 53 above as if fully set forth herein.

58. The Defendant Properties were property, real or personal, used or intended to be used to commit or to promote the commission of a violation of 18 U.S.C. § 1465, and/or property obtained from such offense.

59. As such, the Defendant Properties are subject to forfeiture pursuant to 18 U.S.C. § 1467.

THIRD CLAIM FOR RELIEF
(18 U.S.C. § 981(a)(1)(A))

60. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 53 above as if fully set forth herein.

61. The Defendant Properties were involved in a conspiracy to launder and the laundering of monetary instruments intended to promote the carrying on of a specified unlawful activity, that is, distribution of obscene matter, violations of 18 U.S.C. § 1465 (relating to the production and transportation of obscene matter), and violations of 18 U.S.C. § 2252 (relating to child pornography, where the child pornography contains a visual depiction of an actual minor engaging in sexually explicit conduct).

62. As such, the Defendant Properties are subject to forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(A), as property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956, or property traceable to such property.

PRAYER FOR RELIEF

WHEREFORE, the United States of America prays that notice issue on the Defendant Properties as described above; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that a warrant of arrest *in rem* issue according to law; that judgment be entered declaring that the Defendant Properties be forfeited for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Dated: March 12, 2020

Respectfully submitted,

TIMOTHY J. SHEA, D.C. Bar No. 437437
United States Attorney

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Attorneys for the United States of America

VERIFICATION

I, Christopher Janczewski, a Special Agent with the Internal Revenue Service-Criminal Investigations CCU, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing amended Verified Complaint for Forfeiture *In Rem* is based upon reports and information known to me and/or furnished to me by other law enforcement representatives and that everything represented herein is true and correct.

Executed on this 12th day of March, 2020.

 /s/Christopher Janczewski
Special Agent Christopher Janczewski
Internal Revenue Service-Criminal Investigations

I, Darrell Franklin, a Special Agent with the Homeland Security Investigations, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing amended Verified Complaint for Forfeiture *In Rem* is based upon reports and information known to me and/or furnished to me by other law enforcement representatives and that everything represented herein is true and correct.

Executed on this 12th day of March, 2020.

 /s/ Darrell Franklin
Special Agent Darrell Franklin
Homeland Security Investigations