

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

Plaintiff,

NO. 3:23-CV-411

v.

CRYPTOCURRENCIES SEIZED FROM  
THE VIRTUAL CURRENCY WALLETS  
BEGINNING WITH “0X206F,” “0X6DB6,”  
“0X252D,” “BC1QLELM,” AND  
“0X6FBE” HELD BY “DANIIL  
SHCHUKIN” WITH AN APPROXIMATE  
VALUE OF \$317,251.94 IN DECEMBER  
2022

Defendant *in rem*.

**UNITED STATES’ COMPLAINT FOR FORFEITURE**

The United States of America files this verified complaint *in rem* against the cryptocurrencies seized from the virtual currency wallets beginning with “0x206f,” “0x6db6,” “0x252d,” “bc1qlelm,” and “0x6fbe” held by “Daniil Shchukin” with an approximate value of \$317,251.94 on or about December 2022, that is now located and in the custody and management of the Federal Bureau of Investigation (“FBI”), 1 Justice Way, Dallas, Texas 75220.

**I. JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction of this case of action *in rem* by virtue of the provisions of 28 U.S.C. §§ 1345 and 1355(a). Venue is proper under 28

U.S.C. § 1355(b)(1) and 28 U.S.C. § 1395(b) because the acts giving rise to the forfeiture occurred in this district.

2. The statutory basis for this suit is 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C) & (G). Also applicable are 28 U.S.C. §§ 2461 and 2465, 18 U.S.C. § 983, and Rule G, Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions (Supplemental Rules).

## **II. NOTICE AND POTENTIAL CLAIMANTS**

3. The Defendant Property listed above is located in Dallas County within the Northern District of Texas. The Defendant Property was seized and received by the FBI on or about December 24, 2022 and December 27, 2022.

4. The name and last known address of the individual reasonably appearing to the government as this time to be potential claimant to the Defendant Property is:

Daniil Shchukin, a/k/a Daniil Schukin  
Last known address Ignatova 1, K.V. 5, Krasnodar, Russia 350061  
Email address degteww@gmail.com

Notice of this Complaint will be provided to the above-listed individual.

## **III. FACTS AND BASIS FOR FORFEITURE**

5. The Defendant Property is subject to civil forfeiture pursuant to the following:

A. 18 U.S.C. § 981(a)(1)(C) & (G) because it constitutes or was derived from proceeds traceable to a violation, or conspiracy to violate 18 U.S.C. § 1030 (computer fraud);

B. 18 U.S.C. § 981(a)(1)(C) because it constitutes or was derived from proceeds traceable to a violation, or conspiracy to violate 18 U.S.C. § 1343 (wire fraud);

C. 18 U.S.C. § 981(a)(1)(A) because it was property involved in a violation of 18 U.S.C. §§ 1956 and 1957 (money laundering), and any property traceable to that property, or conspiracy to violate §§ 1956 and 1957.

The offenses involved concern the ransomware variant known as Sodinokibi/REvil. Between on or about April 2019, and July 2021, ransomware attacks across the United States, and elsewhere, were committed resulting in the receipt of over \$200 million dollars in ransom payments by Sodinokibi actors. The Defendant Property constitutes, was derived from, and is traceable to ransomware attacks committed by Shchukin. The Defendant Property is also involved in and traceable to the money laundering conspiracy involving Sodinokibi ransom payments. This is shown by the Verification Affidavit in Support of the United States' Complaint for Forfeiture of Special Agent Joshua Jacobs, filed under seal, and incorporated as Plaintiff's Appendix Exhibit 1. *See United States v. 2121 Kirby Drive*, No. H-06-CV-3335, 2007 WL 3378353, at \*3 n.1 (S.D. Tex. Nov. 13, 2007) (the Court may consider the affidavit together with the complaint).

#### IV. RELIEF SOUGHT

THEREFORE, the United States requests the following:

A. That the Clerk issue a warrant for the arrest of the Defendant Property, pursuant to Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions;

B. That the United States Marshals Service (or designee) arrest the Defendant Property, pursuant to the warrant, as provided by Rule G(3)(c) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions;

C. That the United States publish notice of the complaint for forfeiture on the website [www.forfeiture.gov](http://www.forfeiture.gov) for at least 30 consecutive days, in accordance with Rule G(4)(a)(iv)(c) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions;

D. That the United States serve notice, pursuant to Rule G(4)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, on any person reasonably appearing to be a known potential claimant, advising the person of the date of notice; of the deadline for filing a claim; that an answer or motion under Rule 12(b) must be filed no later than 21 days after the filing of the claim; and of the name of the name of the Assistant United States Attorney to be served with the claim and answer;

E. That the Court, after all proceedings are had on this complaint for forfeiture, declare the Defendant Property forfeited to the United States according to law;

F. That the Court appropriately tax all costs and expenses incurred by the United States in obtaining the forfeiture of the Defendant Property against any persons or entities who filed a verified claim and answer in this case;

G. That the Court grant the United States any further relief, at law or in equity, to which it may show itself justly entitled.

Dated this 22<sup>nd</sup> day of February 2023.

Respectfully submitted,

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

/s/ Tiffany H. Eggers

TIFFANY H. EGGERS

Assistant United States Attorney

Florida Bar No. 0193968

1100 Commerce Street, Third Floor

Dallas, Texas 75242-1699

Telephone: 214-659-8600

Facsimile: 214-659-8805


Tiffany.Eggers@usdoj.gov

ATTORNEY FOR PLAINTIFF

**VERIFICATION OF COMPLAINT**

I, Joshua Jacobs, am a Special Agent with the Federal Bureau of Investigation, and I have been assigned to assist in the forfeiture of the Defendant Property. I have read the foregoing Complaint for Forfeiture and know its contents. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the factual information in the Complaint for Forfeiture is true and correct to the best of my knowledge.

Executed on: February 22, 2023

  
\_\_\_\_\_  
JOSHUA JACOBS, SPECIAL AGENT  
Federal Bureau of Investigation

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.)

I. (a) PLAINTIFFS
UNITED STATES OF AMERICA
(b) County of Residence of First Listed Plaintiff
(c) Attorneys (Firm Name, Address, and Telephone Number)
Tiffany H. Eggers, Assistant United States Attorney
1100 Commerce St., Third Floor, Dallas, Texas 75242

DEFENDANTS
Cryptocurrencies Seized from Virtual Currency Wallets Beginning w/
"0x206f," "0x6db6," "0x252d," "Bc1qlelm," And "0x6fbc" Held By
"Daniil Shchukin" w/ an Approx. Value Of \$317,251.94 in Dec. 2022
County of Residence of First Listed Defendant
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
X 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
Citizen of This State 1 1 Incorporated or Principal Place of Business In This State 4 4
Citizen of Another State 2 2 Incorporated and Principal Place of Business In Another State 5 5
Citizen or Subject of a Foreign Country 3 3 Foreign Nation 6 6

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

V. ORIGIN (Place an "X" in One Box Only)
X 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):
18 U.S.C. § 981(a)(1)(A), 18 U.S.C. § 981(a)(1)(C) & (G)
Brief description of cause:
Complaint for Forfeiture

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 PENDING OR CLOSED CASE(S) IF ANY (See instructions): JUDGE DOCKET NUMBER

DATE 02/22/2023 SIGNATURE OF ATTORNEY OF RECORD /s/ Tiffany H. Eggers

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If a related case exists, whether pending or closed, insert the docket numbers and the corresponding judge names for such cases. A case is related to this filing if the case: 1) involves some or all of the same parties and is based on the same or a similar claim; 2) involves the same property, transaction, or event; 3) involves substantially similar issues of law and fact; and/or 4) involves the same estate in a bankruptcy appeal.

**Attorney Signature.** Date and sign the civil cover sheet.