

AO 109 (Rev. 11/13) Warrant to Seize Property Subject to Forfeiture

# UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

In the Matter of the Seizure of	)	
<i>(Briefly describe the property to be seized)</i>	)	
DOMAIN NAMES: INSTAPI-1XOA93Z900348FZ.CO	)	Case No. Magistrate No. 24-578
API2-4HDFIX74KS.CO	)	
API1-9KCPQCF7OLW1W300W3M6.CC AND	)	[UNDER SEAL]
API-D789342789342UY432HJF87DF87DFK.CC	)	

## WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests that certain property located in the \_\_\_\_\_ District of \_\_\_\_\_ Arizona \_\_\_\_\_ be seized as being subject to forfeiture to the United States of America. The property is described as follows:

SEE ATTACHMENT A

I find that the affidavit(s) and any recorded testimony establish probable cause to seize the property.

**YOU ARE COMMANDED** to execute this warrant and seize the property on or before 04/25/2024  
*(not to exceed 14 days)*

in the daytime 6:00 a.m. to 10:00 p.m.  at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must also give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

An officer present during the execution of the warrant must prepare, as required by law, an inventory of any property seized and the officer executing the warrant must promptly return this warrant and a copy of the inventory to

the Duty Magistrate Judge  
*(United States Magistrate Judge)*

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)*

for \_\_\_\_\_ days (not to exceed 30)  until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: 04/12/2024 10:45 am

[Redacted Signature]

*Judge's signature*

City and state: Pittsburgh, Pennsylvania

[Redacted Name]

United States Magistrate Judge

*Printed name and title*

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**Return**

Case No.: Magistrate No. 24-578	Date and time warrant executed:	Copy of warrant and inventory left with:
------------------------------------	---------------------------------	--

Inventory made in the presence of:

Inventory of the property taken:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*

\_\_\_\_\_  
*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF THE SEIZURE OF ) Magistrate No. 24-578  
DOMAIN NAMES: )  
INSTAPI-1XOA93Z90O348FZ.CO ) [UNDER SEAL]  
API2-4HDFIX74KS.CO )  
API1-9KCPQCF7OLW1W300W3M6.CC AND )  
API-D789342789342UY432HJF87DF87DFK.CC )

**AFFIDAVIT BY TELEPHONIC OR OTHER RELIABLE ELECTRONIC MEANS**  
**IN SUPPORT OF AN APPLICATION FOR SEIZURE WARRANTS**

I, [REDACTED], hereby declare as follows:

**INTRODUCTION**

1. I am a Special Agent with the United States Secret Service (“USSS”) and have been since September 2018. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

3. As set forth below, there is probable cause to believe that **Instapi-1xoa93z90o348fz.co**, **Api2-4hdfix74ks.co**, **Api1-9kcpqcf7olw1w300w3m6.cc**, and **Api-d789342789342uy432hjf87df87dfk.cc** (collectively, the “SUBJECT DOMAIN NAMES”) are subject to seizure and forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A), 981(b), 982(a)(1), 982(b), and 21 U.S.C. § 853, as property used or intended to be used to commit or to facilitate the commission of violations of Title 18, United States Code, Sections 1028 (Identity Theft), 1029 (Access Device Fraud), 1030 (Computer Fraud), 1343 (Wire Fraud), 371 (Conspiracy), and 2 (Aiding and Abetting), and/or as property involved in a violation of Title 18 United States Code Section 1956 (Money Laundering) (the “SUBJECT OFFENSES”). I make this affidavit for warrants to seize the SUBJECT DOMAIN NAMES, described in Attachment A. The procedure by which the government will seize the SUBJECT DOMAIN NAMES is described in Attachment A.

#### **BACKGROUND ON DOMAIN NAMES**

4. Based on my training and experience and information learned from others, I am aware of the following:

5. Internet Protocol Address: An Internet Protocol address (IP address) is a unique numeric address used by computers on the Internet. An IP Address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. An IP address acts much like a home or business street address – it enables computers connected to the Internet to properly route traffic to each other. The assignment of IP addresses to computers connected to the Internet is controlled by Internet Service Providers (ISPs).

6. Domain Name: A domain name is a simple, easy-to-remember way for humans to identify computers on the Internet using a series of characters (e.g., letters, numbers, or other characters) that correspond with a particular IP address. For example, “usdoj.gov” and “cnn.com” are domain names.

7. Domain Name System: The domain name system (“DNS”) is, among other things, a hierarchical convention for domain names. Domain names are composed of one or more parts, or “labels,” that are delimited by periods, such as “www.example.com.” The hierarchy of domains descends from right to left; each label to the left specifies a subdivision, or subdomain, of the domain on the right. The right-most label conveys the “top-level” domain. For example, the domain name “www.example.com” means that the computer assigned that name is in the “.com” top-level domain and “example” is the second-level domain.

8. Domain Name Servers: DNS servers are computers connected to the Internet that convert, or resolve, domain names into IP addresses.

9. Registry: For each top-level domain (such as “.com”), there is a single company, called a “registry,” that determines which second-level domain resolves to which IP address. For example, the registry for the “.com” and “.net” top-level domains.

10. Registrar & Registrant: Domain names may be purchased through a registrar, which acts as the intermediary between the registry and the purchasers of the domain name. For example, the registrar of the SUBJECT DOMAIN NAMES is NameSilo, LLC (“NameSilo”), which has its headquarters at 1300 E. Missouri Avenue, Suite A-110, Phoenix, AZ 85014. The individual or business that purchases, or registers, a domain name is called a “registrant.” Registrants control the IP address, and thus the computer, to which their domain name resolves. Thus, a registrant may easily move a domain name to another computer anywhere in the world.

Typically, a registrar will provide a registrant with the ability to change the IP address a particular IP address resolves through an online interface. Registrars typically maintain customer and billing information about the registrants who used their domain name registration services.

11. Whois: A Whois search provides publicly available information as to which entity is responsible for a particular IP address or domain name. A Whois record for a particular IP address or domain name will list a range of IP addresses that that IP address falls within and the entity responsible for that IP address range and domain name. For example, a Whois record for the domain name XYZ.COM might list an IP address range of 12.345.67.0 through 12.345.67.99 and list Company ABC as the responsible entity. In this example, Company ABC would be responsible for the domain name XYZ.COM and IP addresses 12.345.67.0 through 12.345.67.99.

## **CASE BACKGROUND**

### **LabHost Domain Spoofing Services**

12. In September 2023, the USSS Pittsburgh Field Office received information from the United Kingdom's Metropolitan Police Service ("MPS") concerning their investigation of the administrators and customers of a domain "spoofing" service operated through use of the Lab-host.ru domain ("LabHost"). The ".ru" top-level domain resolves to Russian internet infrastructure company DDoS-Guard. "Spoofing" is a broad term that involves a cybercriminal or other fraudster masquerading as a trusted entity to get the victim to take certain actions beneficial to the fraudster. The service provides users with spoofing domains that collect and store personally identifiable information ("PII") of unwitting victims.

13. As a result of the information provided by the MPS and other foreign law enforcement agencies, the USSS initiated a parallel domestic investigation. As discussed below, this investigation established probable cause to believe that persons have utilized LabHost's

domain spoofing services to committ the SUBJECT OFFENSES.

14. According to MPS' analysis of the LabHost infrastructure, the SUBJECT DOMAIN NAMES support LabHost phishing services. Phishing involves cybercriminals creating infrastructure that purports to be from reputable companies to induce individuals to disclose their PII. LabHost requires that its users create account profiles and provide the necessary infrastructure (domain names and virtual private servers) to host the LabHost spoofed websites and credential stealing capabilities. As described further below, once the (1) users' profiles have been created, (2) the users' infrastructure has been established, and (3) the spoofed domains and websites are deployed, the SUBJECT DOMAIN NAMES facilitate connections to the LabHost infrastructure. Subsequently, the LabHost infrastructure transmits any stored, compromised data that was collected through the spoofed websites to the LabHost users' profiles.

#### **LabHost Analysis by MPS**

15. During the course of the MPS investigation into LabHost, the MPS conducted technical analyses of the platform's infrastructure and services. The MPS purchased a LabHost subscription and utilized LabHost services to identify the SUBJECT DOMAIN NAMES and associated LabHost infrastructure. Furthermore, the MPS obtained copies of the LabHost servers and conducted a forensic review of their contents.

16. The MPS discovered that the LabHost infrastructure comprises twelve unique servers that support LabHost operations. Eight of these servers run the LabHost website, customer interactions, and the archiving of victim data (e.g., stolen account credentials and credit cards). One server delivers and installs spoofed websites used for phishing operations. Finally, three

servers are used for LabHost application programming interface (API) services.<sup>1</sup> These API servers facilitate and manage phishing and credential theft operations on LabHost users' infrastructure. The domain names associated with these API servers are the SUBJECT DOMAIN NAMES: **Api-d789342789342uy432hjf87df87dfk.cc**, **Api2-4hdfix74ks.co**, **Instapi-1xoa93z90o348fz.co**, and **Api1-9kcpqcf7olw1w300w3m6.cc**.

17. Each SUBJECT DOMAIN NAME provides a critical function to support LabHost customer phishing operations. For example, SUBJECT DOMAIN **Instapi-1xoa93z90o348fz.co** provides website templates to generate a spoofed website for a specific banking or customer facing website (e.g., PNC bank or Netflix). The SUBJECT DOMAINS **Api-d789342789342uy432hjf87df87dfk.cc**, **Api2-4hdfix74ks.co** and **Api1-9kcpqcf7olw1w300w3m6.cc** are associated with the collection of the information entered by phishing victims on these spoofed websites. This victim information is transmitted to and archived on LabHost's infrastructure.

18. MPS' analyses revealed that LabHost has been used to create over 40,000 phishing websites. Each of these websites utilized the SUBJECT DOMAIN NAMES to facilitate the theft of user credentials and other associated information (passwords, credit cards, and banking information). Over one million user credentials and nearly 500,000 compromised credit cards were stored on LabHost infrastructure.

### **Undercover Operation**

19. In March 2024, I conducted an undercover operation on LabHost. From a USSS-controlled computer located in the Western District of Pennsylvania, I created a LabHost user

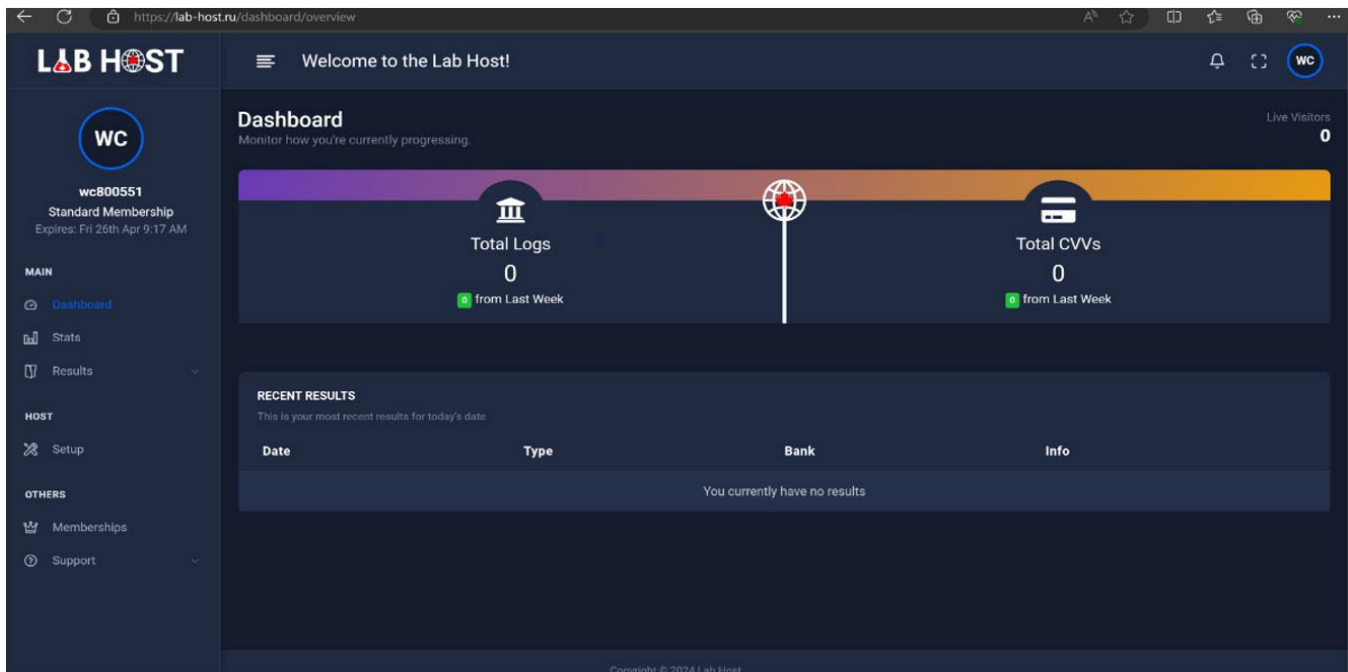
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<sup>1</sup> According to open-source information, API is a set of rules or protocols that allow software applications to communicate to exchange data, features, and functionality.



profile by establishing a username and password with LabHost. Once the user profile was established, LabHost required that I select between the North America account or World account. Based upon my training, knowledge, and experience, as well as my direct involvement in this investigation, I know that selecting a North America account limits the user to spoofing domains specific to North America, and the World account allows the user to spoof domains worldwide.

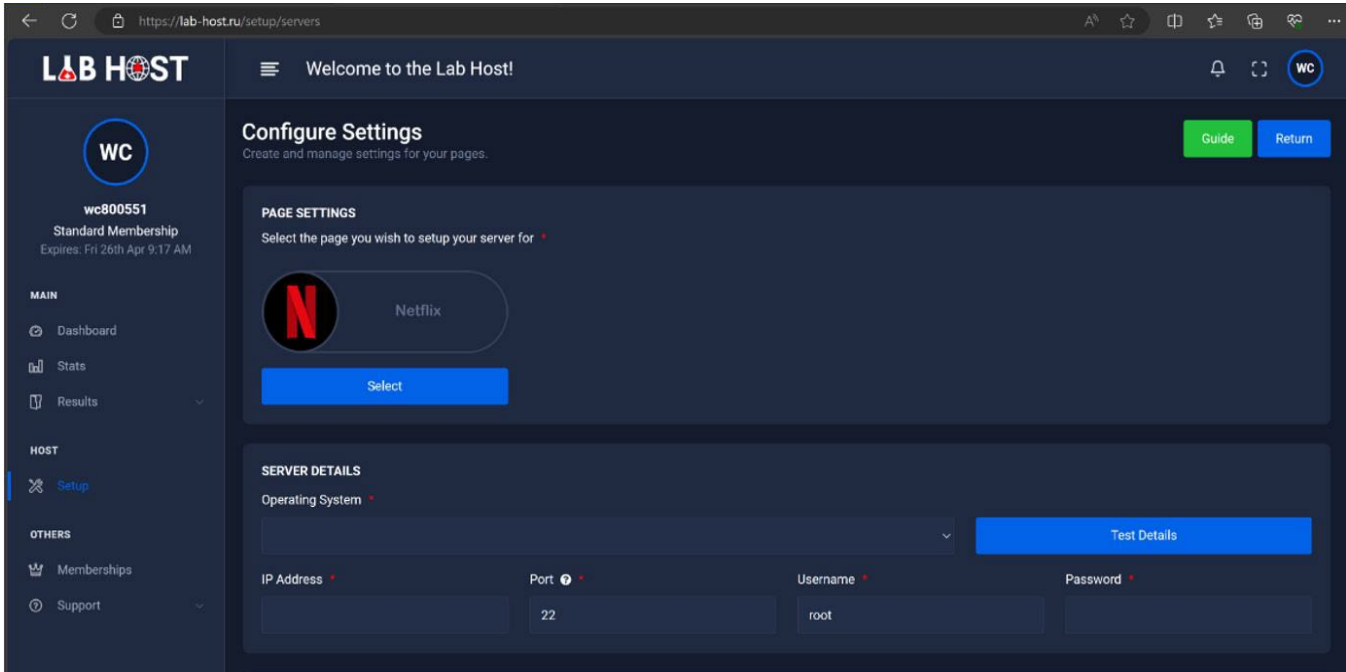
20. I selected the North America account. Once selected, LabHost prompted me to make a Bitcoin payment of .00259 Bitcoin to Bitcoin address, 3BDP1ZoZb3aC6TYAr9TmLWuK1PfhLEr1P. From a USSS-controlled cryptocurrency account managed in the Western District of Pennsylvania, I sent approximately .00312 Bitcoin (\$225 approximate value plus fees) to LabHost's Bitcoin address. Payment was successful, and I gained access to the following user profile:



21. The USSS undercover LabHost user profile displays total logs and total CVVs. Based upon my training, knowledge, and experience, as well as my direct involvement in this investigation, I know that the term total logs refer to the PII datasets LabHost collects from the

spoofed domain servers, and the term total CVVs refers to credit card data used in online transactions that LabHost also collects. I also know that cybercriminals utilize this type of information to monetize their cybercrimes and/or to sell to other cybercriminals.

22. I clicked the Setup option under the Host tab and was directed to the following page:



This page allows LabHost users to configure their webservers (server details section) so that the LabHost infrastructure can connect to those webservers. This is how LabHost provides their spoofing and credential theft service to each user. LabHost users must register their own domain names and provide a server where the content (as in, a spoofed website) is hosted. LabHost, via the SUBJECT DOMAIN NAMES, then configures and runs the content and functionality to steal PII and credit card information. For example, based upon the above, if the USSS wanted to spoof the Netflix website, the USSS would enter its virtual private server infrastructure information in the server details section. The USSS would then register a domain name that would be used to spoof the Netflix website, and would then be hosted on the virtual private server. LabHost would

use this information to connect to the USSS' infrastructure to set up the spoofed Netflix website. Unwitting victims would visit the spoofed Netflix website and enter their PII. LabHost would collect the victims' PII and provide it to the USSS user account. This is consistent with both my analysis below and MPS' investigation described above.

23. To confirm how the LabHost server operates, I accessed LabHost's HTML source code by opening Microsoft Edge's settings associated with the URLs depicted in the images above. Based upon my training, knowledge, and experience, I know that the HTML source code is built into websites. It provides the source code utilized to make a website function. A review of the HTML decompiler information for the LabHost URL revealed the following:

```
// Second AJAX POST request
$.ajax({
  url: 'http://api1-9kcpqcf7olw1w300w3m6.cc/add_ssl',
  type: 'POST',
  contentType: 'application/json',
  data: JSON.stringify(payload),
  success: function(deployResponse) {
```

24. According to open-source information, the term "ajax" is a function that prompts a server to request or receive data from another server. The next line of code under the "ajax" command is one of the SUBJECT DOMAINS, **Api1-9kcpqcf7olw1w300w3m6.cc**. This domain was identified in the MPS analysis, described above. Based upon my training, knowledge, and experience, as well as my direct involvement in this investigation, I know that this URL is used to facilitate the LabHost operations and services described previously. Therefore, although the undercover operation didn't include the setting up of domain infrastructure and collection of compromised data, there is probable cause to believe that the website would function in a way to do so.

### **LabHost Infrastructure Analysis**

25. In 2023, international law enforcement authorities obtained a copy of the LabHost

servers through official law enforcement activity. In 2024, those authorities provided a copy of the LabHost servers to the USSS through official law enforcement channels. A review of the data identified over 9000 user accounts that were designated with a numerical UserID and username. The data also revealed that LabHost administrators attributed datasets, like IP logins, payments, data servers, data domains, and data logs, to its users. The identified LabHost accounts included “UserID 5236” that registered the username “jimboneutron.” LabHost’s datasets for this account contained the following Netflix website configuration information:

```
Files: Netflix
Version:1.0
OS:1
Host: 51.195.127.94
Port:22
Username: root
Password: ****99!!
```

26. This information matches the configure settings Netflix option discovered through the undercover operation I conducted and described above. Further review of the UserID 5236 account revealed a data logs dataset that contained over 14,000 different entries. These entries include, among other entities, Amazon, Netflix, Wells Fargo, Bank of America, and Chase Bank. Each entry contained stolen PII. Based upon my training, knowledge, experience, and direct involvement in this investigation, I know that the UserID 5236 used LabHost’s spoofing services, created domain servers to host the spoofed domains, and fraudulently collected stolen customer PII, including PII belonging to a resident of the Western District of Pennsylvania.

#### **Analysis of UserID 5236’s Bitcoin Payments to LabHost**

27. I analyzed UserID 5236’s profile and discovered that it made seven Bitcoin payments from January 2023 through October 2023 to LabHost Bitcoin wallets on the blockchain, which is a publicly available ledger of all Bitcoin transactions. I conducted a forensic analysis of

the blockchain and determined the following seven transactions occurred:

<b>Incoming Bitcoin Transfers to LabHost</b>	<b>Outgoing Bitcoin Transfers Addresses</b>
3LzrsfWPHK... Amount: .0111 BTC	bc1qx6g0xu7hzpnk9728avj5jpyfjpyqdpstyr8jwm
36D5uEMw... Amount: .0076 BTC	bc1qqm2d7zfrdqewun0akmx0258r39s7pdag48e7zq
32nudpSp... Amount: .0091 BTC	bc1qs5u970mfzx7rjadmyqshcuf59fwe33r2uv4mdd
3Ah6Lqeg... Amount: .0097 BTC	bc1q3uwvmjwhk7dau8vfhfmykyzu6qp7pw7yvctx6dg
3AYp8Goc... Amount: .0880 BTC	bc1qvqqxr9tpwccduh0a8880jp5mxfrkqmdsxhcll
33Bwyb7U... Amount: .0086 BTC	bc1q8nz2lqvw7qak43ucejamep4ll9xgs7lhy77ewj
3CDjWHKb... Amount: .0093 BTC	bc1qkxn0m5e08r0kjxtn3cl43cswte3z54ys4kn28

28. I conducted additional blockchain analysis of the outgoing Bitcoin transfer addresses and identified four of the seven transactions listed in the table as Wasabi Wallet Bitcoin addresses. Based on my training, knowledge, experience, and direct involvement in this investigation, I know that Wasabi Wallet is a Bitcoin mixing service that anonymizes Bitcoin transactions and thwarts law enforcement's ability to identify the nature, location, source, ownership, and control of the Bitcoin. Accordingly, I also know that cybercriminals, like the subjects operating LabHost, utilize Wasabi Wallet to launder the proceeds of their crimes. Thus, probable cause exists to believe that the subjects operating LabHost are utilizing Wasabi Wallet to launder the payments from LabHost users, like UserID 5236, in furtherance of the SUBJECT OFFENSES.

#### **Western District of Pennsylvania Victims**

29. Victim 1 is an elderly resident of Pittsburgh, Pennsylvania. The USSS identified Victim 1's PII in LabHost UserID 5236's account. Victim 1's information included Victim 1's date of birth, email address, password, address, full credit card information for credit card ending in 3557, and Amazon account data. Your affiant interviewed Victim 1 via telephone on or about

March 15, 2024. Your affiant advised Victim 1 that Victim 1's PII was compromised around August 2023, based upon when UserID 5236's profile revealed it harvested Victim 1's PII. Victim 1 confirmed that the Amazon account data was, in fact, Victim 1's Amazon account, email address, password, address, and credit card information. Victim 1 advised that Victim 1 did not consent or authorize the sale or use of that information. Victim 1 advised that credit card ending in 3557 belonged to Victim 1 and that it was linked to Victim 1's KeyBank checking account. Victim 1 also advised that this credit card was closed around August 2023 due to fraud. During the interview, Victim 1 logged into Victim 1's KeyBank checking account and identified an August 2023 payment to American Airlines totaling \$492. Victim 1 advised that Victim 1 did not authorize this transaction. Victim 1 also identified thirteen unauthorized debits of \$25 and three unauthorized debits of \$50 in August 2023. Based upon my training, knowledge, and experience, as well as my direct involvement in this investigation, I believe that Victim 1's information in UserID 5236's profile is consistent with how LabHost collects compromised PII through the SUBJECT DOMAIN NAMES' infrastructure and transfers that data to a LabHost's user's profile.

30. Victim 2 is an elderly resident of Pittsburgh, Pennsylvania. The USSS identified Victim 2's PII in LabHost UserID 5236's account. Victim 2's information included Victim 2's, date of birth, email, password, address, and full credit card information for credit card number ending in 7266. Your affiant interviewed Victim 2 via telephone on or about March 22, 2024. Your affiant advised Victim 2 that Victim 2's PII was compromised around August 2023, again based upon when UserID 5236's profile revealed it harvested Victim 2's PII. Victim 2 confirmed that the Amazon account data was, in fact, Victim 2's Amazon account, email address, password, address, and credit card information. Victim 2 advised that Victim 2 did not consent or authorize the sale or use of that information. Victim 2 advised that credit card ending in 7266 belonged to

Victim 2 and that it was linked to Victim 2's Merrill Lynch investment account. On or about August 18, 2023, Merrill Lynch contacted Victim 2 and advised that Victim 2's credit card ending in 7266 was compromised with an unauthorized \$25 charge. Based upon my training, knowledge, and experience, as well as my direct involvement in this investigation, I believe that Victim 2's information in UserID 5236's profile is consistent with how LabHost collects compromised PII through the SUBJECT DOMAIN NAMES' infrastructure and transfers the data to a LabHost user's profile.

### **THE SUBJECT DOMAIN NAMES**

31. An open source WHOIS search for the SUBJECT DOMAIN **Instapi-1xoa93z90o348fz.co** confirmed it was registered on or about September 7, 2022, through NameSilo.

32. An open source WHOIS search for the SUBJECT DOMAIN **Api2-4hdfix74ks.co** confirmed it was registered on or about October 28, 2022, through NameSilo.

33. An open source WHOIS search for the SUBJECT DOMAIN **Api-d789342789342uy432hjf87df87dfk.cc** confirmed it was registered on or about August 19, 2021, through NameSilo.

34. An open source WHOIS search for the SUBJECT DOMAIN **Api1-9kcpqcf7olw1w300w3m6.cc** confirmed it was registered on or about August 18, 2022, through NameSilo.

### **VIOLATIONS OF THE SUBJECT OFFENSES**

35. The foregoing evidence establishes probable cause that the SUBJECT DOMAIN NAMES are subject to seizure and forfeiture because they are property used and intended to be used to commit and to facilitate the commission of the SUBJECT OFFENSES and as property

involved in money laundering.

36. The foregoing establishes probable cause that LabHost sells accesses to information (username and password combinations) that constitute “access devices” under 18 U.S.C. § 1029 (Access Device Fraud) through its spoofing services. *See* 18 U.S.C. § 1029(e)(1) (“the term ‘access device’ means any card, plate, code, account number, electronic serial number, mobile identification number, personal identification number, or other telecommunications service, equipment, or instrument identifier, or other means of account access that can be used, alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value, or that can be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument)”).

37. Further, by providing this information to its criminal “customers” who, like UserID 5236, utilize it to gain access to online accounts of unwitting third-party victims, the subjects operating LabHost are aiding and abetting and conspiring to commit violations of both 18 U.S.C. § 1030 (Computer Fraud) and 18 U.S.C. § 1343 (Wire Fraud). For example, probable cause exists to believe that (1) UserID 5236 paid approximately \$1,712 in Bitcoin over the course of several months in exchange for access to LabHost’s spoofing services; (2) through its spoofing services, LabHost provided UserID 5236 with the PII of Victim 1 and Victim 2; and (3) UserID 5236 utilized that PII to access, without authorization, both Victim 1’s credit card and Victim 2’s credit card to conduct fraudulent transactions from each.

38. In connection with these foregoing SUBJECT OFFENSES, the subjects operating LabHost are knowingly transferring, possessing, and using, without lawful authority, the “means of identification” (e.g., username/password combinations) of others. Accordingly, there is also probable cause that they are violating 18 U.S.C. § 1028 (Identity Theft). *See* 18 U.S.C.



§ 1028(a)(7) (stating an offense where a defendant “knowingly transfers, possesses, or uses, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, or that constitutes a felony under any applicable State or local law”).

39. Finally, the subjects operating LabHost accepted User ID 5236’s Bitcoin payment into their Bitcoin wallets to authorize User ID 5236’s utilization of the LabHost servers to commit violations of the foregoing SUBJECT OFFENSES. The subjects operating LabHost then transferred a portion of that Bitcoin through the Bitcoin mixing service Wasabi Wallet to conceal and disguise the nature, location, source, ownership, and the control of that Bitcoin, in violation of 18 U.S.C. § 1956. *See* 18 U.S.C. § 1956(a)(1)(B)(i) (stating an offense where a defendant “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 . . . to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity”).

**STATUTORY BASIS FOR SEIZURE AND FORFEITURE**

40. Title 18, United States Code, Section 1028(b)(5) provides, in relevant part, that the punishment for the crime of Identity Theft, in violation of 18 U.S.C. § 1028, shall include forfeiture of any personal property used or intended to be used to commit the offense.

41. Title 18, United States Code, 1029(c)(1)(C) provides, in relevant part, that the punishment for the crime of Access Device Fraud, in violation of 18 U.S.C. § 1029, shall include forfeiture of any personal property used or intended to be used to commit the offense. Title 18, United States Code, Sections 1030(i)(1)(A) and (B) provide, in relevant part, that the punishment for the crime of Computer Fraud, in violation of 18 U.S.C. § 1030, shall include forfeiture of a

defendant's interest in any personal property that was used or intended to be used to commit or to facilitate the commission of such violation and property, real or personal, constituting or derived from, any proceeds that a defendant obtained, directly or indirectly, as a result of such violation. Authority to seize this property is governed by the provisions of 21 U.S.C. § 853. *See* 18 U.S.C. § 1030(i)(2) ("The criminal forfeiture of property under this subsection, any seizure and disposition thereof, and any judicial proceeding in relation thereto, shall be governed by the provisions of . . . 21 U.S.C. 853"). Section 853(f) provides, in relevant part, that a seizure warrant may be sought for "property subject to forfeiture under this section in the same manner as provided for a search warrant." 18 U.S.C. § 853(f).

42. The proceeds of Wire Fraud, in violation of 18 U.S.C. § 1343, are subject to forfeiture under both civil and criminal forfeiture authorities. Pursuant to 18 U.S.C. § 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to wire fraud is subject to forfeiture.

43. Property involved in a money laundering offense, including violations of 18 U.S.C. § 1956, is subject to forfeiture under both civil and criminal forfeiture authorities. Pursuant to 18 U.S.C. § 981(a)(1)(A), any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 or 1957, or any property traceable to such property, is subject to civil forfeiture. In addition, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in a violation of 18 U.S.C. § § 1956 or 1957, or any property traceable to such property, is subject to criminal forfeiture. Forfeiture pursuant to these statutes applies to more than just the proceeds of the crime. These forfeitures encompass all property "involved in" the crime, which can include personal property and untainted funds that are comingled with tainted funds derived from illicit sources.

44. This application seeks a seizure warrant under both civil and criminal authority because the property to be seized could be placed beyond process if not seized by warrant.

45. Pursuant to 18 U.S.C. § 981(b)(3), property subject to civil forfeiture may be seized via a civil seizure warrant issued by a judicial officer “in any district in which a forfeiture action against the property may be filed . . . and may be executed in any district in which the property is found,” if there is probable cause to believe the property is subject to forfeiture. The criminal forfeiture statute, 18 U.S.C. § 982(b)(1), incorporates the relevant procedures in 21 U.S.C. § 853 for a criminal forfeiture action. As explained above, 21 U.S.C. § 853(f) permits the government to request the issuance of a seizure warrant for property subject to criminal forfeiture. A court shall issue a criminal seizure warrant if it determines that the property to be seized would, in the event of a conviction, be subject to forfeiture and that a restraining order would be inadequate to assure the availability of the property for forfeiture. Specifically, “[i]f the court determines that there is probable cause to believe that the property to be seized would, in the event of conviction, be subject to forfeiture and that [a restraining order or injunction] may not be sufficient to assure the availability of the property for forfeiture, the court shall issue a warrant authorizing the seizure of such property.” 21 U.S.C. § 853(f).

46. Neither a restraining order nor an injunction is sufficient to guarantee the availability of the SUBJECT DOMAIN NAMES for forfeiture. By seizing the SUBJECT DOMAIN NAMES and redirecting them to another website, the government will prevent third parties from acquiring the names and using them to commit additional crimes. Furthermore, seizure of the SUBJECT DOMAIN NAMES will prevent third parties from continuing to access the LabHost website in its present form.

47. Title 18, United States Code, Section 981(h) provides that venue for civil forfeitures

brought under this section lies in the district either where the defendant owning the property is located or in the judicial district where the criminal prosecution is brought.

48. As set forth above, there is probable cause to believe that the SUBJECT DOMAIN NAMES are subject to civil and criminal forfeiture because they were used or intended to be used to commit or to facilitate the commission of the SUBJECT OFFENSES in the Western District of Pennsylvania.

### **SEIZURE PROCEDURE**

49. As detailed in Attachment A, upon execution of the seizure warrants, NameSilo (the registrar for the SUBJECT DOMAIN NAMES) shall be directed to restrain and lock the SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with the USSS, the Federal Bureau of Investigation (“FBI”), and/or the United States Department of Justice.

50. In addition, upon seizure of the SUBJECT DOMAIN NAMES by the USSS and/or FBI, NameSilo will be directed to associate the SUBJECT DOMAIN NAMES to a new authoritative name server(s)<sup>2</sup> to be designated by a law enforcement agent.

### **CONCLUSION**

51. For the foregoing reasons, I respectfully submit there is probable cause to believe that the SUBJECT DOMAIN NAMES are used in/or intended to be used in facilitating and/or

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<sup>2</sup> According to the Internet Assigned Numbers Authority, an authoritative name server is a DNS server that has been designated to answer authoritatively for the designated zone and is being requested to be listed in the delegation. It is recorded by its fully qualified domain name, potentially along with its IP address.

committing the SUBJECT OFFENSES. Accordingly, the SUBJECT DOMAIN NAMES are subject to civil and criminal forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A), 981(b), 982(a)(1), and 982(b); 21 U.S.C. § 835; and other offense-specific statutes set forth above, and I respectfully request that the Court issue seizure warrants for the SUBJECT DOMAIN NAMES.

52. Because the warrants for the SUBJECT DOMAIN NAMES will be served on NameSilo, and, thereafter, NameSilo will transfer control of the respective SUBJECT DOMAIN NAMES to the government, there exists reasonable cause to permit the execution of the requested warrants at any time in the day or night.

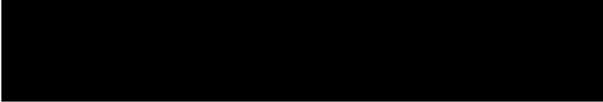
53. I further request that the Court order that all papers in support of this application, including the affidavit and seizure warrants, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may give targets an opportunity to flee/continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise seriously jeopardize the investigation.

The above information is true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

, Special Agent  
United States Secret Service

Sworn and subscribed before me, by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), this 12<sup>th</sup> day of April, 2024.



HONORABLE   
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

With respect to **Instapi-1xoa93z90o348fz.co**, **Api2-4hdfix74ks.co**, **Api1-9kcpqcf7olw1w300w3m6.cc**, and **Api-d789342789342uy432hjf87df87dfk.cc** (the “SUBJECT DOMAIN NAMES”), NameSilo, LLC (“NameSilo”). which has its headquarters at 1300 E. Missouri Avenue, Suite A-110, Phoenix, AZ 85014, and is the domain registrar for the SUBJECT DOMAIN NAMES, shall take the following actions to effectuate the seizure of the SUBJECT DOMAIN NAMES:

1. On a date and time specified by the United States Secret Service (“USSS”) and/or Federal Bureau of Investigation (“FBI”), and/or the or as soon as practicable thereafter, NameSilo shall take all reasonable measures to redirect the SUBJECT DOMAIN NAMES to substitute servers designated by the USSS by associating the SUBJECT DOMAIN NAMES to the following authoritative name-servers:

- (a) **hans.ns.cloudflare.com** ;
- (b) **surina.ns.cloudflare.com**; and/or
- (c) Any new authoritative name server to be designated by a law enforcement agent in writing, including e-mail, to NameSilo.

2. Prevent any further modification to, or transfer of, the SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings, to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with the USSS, FBI, or the U.S. Department of Justice.

3. Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.

4. Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order.

Following the seizure of the SUBJECT DOMAIN NAME, at a date and time to be determined by the USSS and/or the FBI pending the completion of law enforcement operations, but not to exceed fourteen (14) days from the date of this Court's Order, the Government will display a final notice on the website to which the SUBJECTS DOMAIN NAMES will resolve. This final notice, which will replace the temporary notice described above, will consist of law enforcement emblems and the following text (or substantially similar text):

“This domain has been seized by the Federal Bureau of Investigation (FBI) and the United States Secret Service (USSS) pursuant to a seizure warrant obtained by the United States Attorney's Office for the Western District of Pennsylvania under the authority of 18 U.S.C. §§ 981, 982, and 1030, as part of a law enforcement action taken in parallel with the United Kingdom's Metropolitan Police Service (MPS), and other international law enforcement partners. International law enforcement continues to work collectively against cybercrime, wherever and however it is committed.”