

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

REAL PROPERTY LOCATED AT 10295 COLLINS AVENUE,
UNIT 1616, BAL HARBOUR, FLORIDA 33154; and

REAL PROPERTY LOCATED AT 10295 COLLINS AVENUE,
UNIT 1617, BAL HARBOUR, FLORIDA 33154.

Defendants *in rem*.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

PLAINTIFF, the United States of America, hereby files this civil complaint for forfeiture *in rem* and alleges as provided below. All dates, amounts, and locations described in this complaint are approximations.

INTRODUCTION

1. This is a civil action *in rem*, pursuant to 18 U.S.C. §§ 981(a)(1)(C), 981(a)(1)(A), and 985, the procedures set forth in Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and the Federal Rules of Civil Procedure to forfeit real property located at 10295 Collins Avenue, Unit 1616, Bal Harbour, Florida 33154 (“Unit 1616”) and at 10295 Collins Avenue, Unit 1617, Bal Harbour, Florida 33154 (“Unit 1617” and together with Unit 1616, the “Defendant Properties”). The Defendant Properties constitute or are derived from proceeds traceable to violations of the International Emergency Economic Powers Act (“IEEPA”), 50 U.S.C. § 1701, *et seq.*, and are property involved in money laundering in violation

of 18 U.S.C. §§ 1956(h), 1956(a)(1)(A)(i), and 1957. The Court has jurisdiction over the subject matter pursuant to 28 U.S.C. §§ 1345 and 1355.

2. The Court has *in rem* jurisdiction over the Defendant Properties pursuant to 28 U.S.C. § 1355.

3. Venue for this action is proper in the Southern District of Florida because acts or omissions giving rise to the forfeiture occurred in this District and because the Defendant Properties are in this District. *See* 28 U.S.C. §§ 1355(b)(1) and 1395.

RELEVANT STATUTES & EXECUTIVE ORDERS

4. IEEPA conferred upon the President of the United States the authority to deal with unusual and extraordinary threats to the nation's national security and foreign policy. *See* 50 U.S.C. §§ 1701, 1702, and 1703. Under IEEPA, “[i]t shall be unlawful for a person to violate, attempt to violate, conspire to violate, or cause a violation of any license, order, regulation, or prohibition issued under this chapter.” 50 U.S.C. § 1705(a).

5. In 2014, pursuant to his authorities under IEEPA, the President of the United States issued Executive Order (“E.O.”) 13660, which declared a national emergency regarding the Crimea region of Ukraine. E.O. 13660 (Mar. 6, 2014), 79 Fed. Reg. 13493 (Mar. 10, 2014). The national emergency declared in E.O. 13660 regarding the situation in Ukraine has remained in continuous effect since 2014 and was most recently continued for another year commencing March 1, 2023. *See* Continuation of the National Emergency with Respect to Ukraine, 88 Fed. Reg. 13285 (Mar. 2, 2023). On multiple occasions, the President of the United States expanded the scope of the national emergency declared in E.O. 13660.

6. On December 19, 2014, using the powers conferred by, among other authorities, IEEPA and the National Emergencies Act, 50 U.S.C. § 1601, *et seq.*, the President of the United

States issued E.O. 13685, “Blocking Property of Certain Persons and Prohibiting Certain Transactions with Respect to the Crimea Region of Ukraine.” E.O. 13685 § 2, 79 Fed. Reg. 77357 (Dec. 24, 2014). E.O. 13685 authorized the Department of the Treasury to designate persons and block their “property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch).” *Id.* Such blocked property “may not be transferred, paid, exported, withdrawn, or otherwise dealt in.” *Id.* E.O. 13685 prohibited “[a]ny transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this [E.O.]” E.O. 13685 § 6(a). E.O. 13685 also prohibited “[a]ny conspiracy formed to violate any of the prohibitions set forth in this order.” E.O. 13685 § 6(b). A violation of E.O. 13685 is an IEEPA violation. *See* 50 U.S.C. § 1705(a).

7. Executive Orders 13660, 13661, 13662, and 13685 are part of a set of regulations known as the “Ukraine-/Russia-Related Sanctions Regulations.” 87 Fed. Reg. 26,094 (May 2, 2022), 31 C.F.R. Part 589. These regulations incorporate by reference the prohibited transactions set forth in the executive orders. 31 C.F.R. § 589.201. Under the regulations, the property and interests in property of an entity that is 50 percent or more owned, whether individually or in the aggregate, directly or indirectly, by one or more persons whose property and interests in property are blocked pursuant to any part of 31 C.F.R., Chapter V., are also blocked, regardless of whether the entity itself is listed. 31 C.F.R. § 589.411.

8. E.O. 13685 applied to persons who, according to the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”), conducted activities that directly supported Russia’s annexation of the Crimea region of Ukraine in 2014.

9. OFAC refers to persons or entities designated under these executive orders as specially designated nationals and blocked persons (“SDNs”) and they are included in the SDN List. The SDN List is publicly available in the U.S. Department of the Treasury website. A person or entity may seek to obtain an OFAC license to transact with a person on the SDN List. A U.S. person transacting with an SDN without first obtaining a license from OFAC violated IEEPA.

FACTUAL ALLEGATIONS

I. Relevant Persons and Property

10. VAD, AO is a St. Petersburg, Russia-based construction company responsible for constructing the Tavrida Highway in the Russian-occupied Crimea region of Ukraine.

11. Russian national, Viktor Pavlovich Perevalov (“Perevalov”), was VAD, AO’s co-founder and First Deputy General Director. In 2008, Perevalov and a family member, S.P., purchased the Defendant Properties.

12. Russian national, Valeri Vyacheslovovich Abramov (“Abramov”), was VAD, AO’s co-founder and General Director. Abramov maintained bank accounts at a U.S. financial institution (“Bank-1”) in the Southern District of Florida (the “Abramov Accounts”).

13. 1616 Collins LLC is a Delaware company formed on April 10, 2018. 1616 Collins LLC became the title owner of the Defendant Properties commencing on June 14, 2018.

14. R.P., a U.S. citizen, is a family member of Perevalov. R.P. is listed as 1616 Collins LLC’s sole beneficial owner.

15. R.S., a U.S. citizen, is a real estate agent and owner of a real estate business (“REB”) in the Miami, Florida area. REB maintained business accounts at Bank-2 (“REB Accounts”), including an account ending in X2562 (“REB X2562”) and an account ending in X2921 (“REB X2921”). R.S. also maintained a personal bank account at Bank-2 ending in X8895

(“R.S. X8895”). R.S. served as the property manager of the Defendant Properties and retained a power of attorney to transact on behalf of Abramov and Perevalov. The Abramov Accounts’ signature cards listed R.S. as Abramov’s “care of party.” R.S. is also a manager for 1616 Collins LLC.

16. R.S. and Perevalov used the services of a law firm operating in the Southern District of Florida (“Law Firm”) to transact in the Defendant Properties.

II. OFAC Sanctions

17. On January 26, 2018, pursuant to E.O. 13685, OFAC sanctioned Perevalov, Abramov, VAD, AO, and others following the Russian invasion of Crimea, a region of Ukraine (the “Sanctions”). OFAC added Perevalov, Abramov, and VAD, AO to the SDN List. Once OFAC imposed the Sanctions, all property or interest in property belonging to Perevalov, Abramov, and/or VAD, AO in the United States, including the Defendant Properties and the Abramov Accounts, “[was] blocked and [could] not be transferred, paid, exported, withdrawn, or otherwise dealt in[.]” E.O. 13685 § 2(a). At no time were the Defendant Properties, the Abramov Accounts, or any other property belonging to Perevalov and Abramov, exempted from the Sanctions. OFAC never issued a license for anyone to transact with, or on behalf of, Perevalov and Abramov.

18. The Sanctions were reported on numerous English and Russian-language websites in early 2018.

19. Notwithstanding the Sanctions, R.S. and Perevalov willfully engaged in prohibited transactions involving blocked property in the Southern District of Florida as set forth below.

III. The Abramov Accounts and R.S.'s Knowledge of the Sanctions

20. On February 6, 2018, Bank-1 froze all funds in the Abramov Accounts in response to the Sanctions.

21. In March 2018, a Bank-1 employee contacted R.S. to confirm that Abramov was the same Abramov on the SDN List. R.S. confirmed this fact. The Bank-1 employee informed R.S. that “[Abramov] needs to apply for a License, directly to OFAC (Office of Foreign Assets Control, a U.S. government entity) to release the funds in the [Abramov Accounts].”

22. Thereafter, R.S. coordinated with another person (“Person-1”) to seek OFAC’s approval on Abramov’s behalf to release the frozen funds in the Abramov Accounts. On March 19, 2018, Person-1 emailed R.S. the relevant sanction authority, E.O. 13685, to complete an OFAC application to unfreeze the Abramov Accounts. The email further informed R.S. that VAD, AO – the company Perevalov co-founded with Abramov – was sanctioned pursuant to E.O. 13685.

IV. Transactions involving the Defendant Properties

23. Between September 30, 2014, and March 13, 2018, Perevalov was the authorized signatory on Bank-2 account ending in X8629 (“VP X8629”). Funds in this account were used to pay the Florida Power & Light (“FP&L”) electric bills for the Defendant Properties.

24. On April 5, 2018, \$550.05 from VP X8629 was transferred to R.S. X8895. This transaction independently violated the Sanctions. VP X8629 was closed by the end of April 2018.

25. On April 10, 2018, R.S. and others formed 1616 Collins LLC. R.P., a minor at the time, was the entity’s purported sole beneficial owner. R.S. managed 1616 Collins LLC.

26. Law Firm formed the entity 1616 Collins LLC, including by preparing and filing with the State of Delaware 1616 Collins LLC’s articles of incorporation.

27. On June 13, 2018, R.S. opened an account ending in X7108 at Bank-2 in the name of 1616 Collins LLC (the “1616 Account”).

28. On June 14, 2018, the title of the Defendant Properties was transferred to 1616 Collins LLC in violation of the Sanctions. R.S. served as Perevalov’s power of attorney for the transfer. Law Firm prepared the deed memorializing the transfer.

29. After June 14, 2018, the payments of the Defendant Properties’ FP&L bills, and other maintenance payments, were paid from the 1616 Account. Despite the purported change in title ownership, the FP&L bills continued to be addressed to Perevalov until July 20, 2020, more than two years after the transfer to 1616 Collins LLC.

30. On October 22, 2018, Law Firm paid Miami-Dade County Clerk of Court a documentary stamp tax in the amount of \$8,400 to record the transfer of the title of the Defendant Properties. The documentary stamp tax amount represents a 60-cent tax per \$100 of the total consideration for a real estate transfer. Although Miami-Dade County property records show the transfer of the title of the Defendant Properties as a sale from Perevalov and S.P. to 1616 Collins LLC, neither Law Firm nor R.S. had any record of a sales agreement.

31. Prior to and after the Sanctions, R.S. leased the Defendant Properties to tenants for short-term rentals in U.S. dollars.

32. Based on WhatsApp text messages and FP&L records, Perevalov retained beneficial ownership of the Defendant Properties after the transfer to 1616 Collins LLC.

33. On June 21, 2021, in a conversation over WhatsApp, R.P. requested that R.S. “send the financial reports on my company 1616, 1617 for the last three years. As my parents said, I will be the one to handle it going forward.” R.S. replied the same day, “I spoke with father [Perevalov]. I am aware.”

34. On September 7, 2022, R.S. emailed Perevalov and R.P. a tax form for 1616 Collins LLC regarding the Defendant Properties.

35. 1616 Collins LLC continues to be the title owner of the Defendant Properties.

V. Laundering of IEEPA Proceeds

36. As the property manager for the Defendant Properties and manager of 1616 Collins LLC, R.S. leased the Defendant Properties and collected rental proceeds on behalf of 1616 Collins LLC. The rental proceeds derived from the Defendant Properties were deposited into the REB Accounts. The REB Accounts were used by R.S. as part of his real estate and property management businesses. In addition to receiving rental proceeds for the Defendant Properties, the REB Accounts received deposits for other real estate services.

37. Between December 27, 2018, through February 22, 2023, a total of \$288,060.00 in rental proceeds derived from the Defendant Properties was deposited into the 1616 Account from the REB Accounts. During this period, the balance of rental proceeds from the Defendant Properties in the REB Accounts never reached zero.

38. For example, between February 14, 2018, and November 2, 2018, REB X2562 received a total of \$34,495.00 in rental proceeds derived from the Defendant Properties.

39. On December 27, 2018, a check drawn from REB X2562 in the amount of \$39,500.00 was deposited into the 1616 Account. This deposit contained rental proceeds derived from the Defendant Properties.

40. From January 2, 2019, through March 14, 2023, a total of \$275,950.70 was transferred from the 1616 Account to various entities for the continued ownership and maintenance of the Defendant Properties, including for real estate property taxes paid to the Miami-Dade

County Tax Collector, homeowners association fees, payments for special assessments to the Defendant Properties' homeowners association, and electric utility costs.

41. Specifically, on November 19, 2020, a wire transfer in the amount of \$18,887.15 was made from the 1616 Account to the Miami-Dade County Tax Collector for a property tax payment for the Defendant Properties.

42. The rental proceeds were also used to promote the ongoing scheme to transact in the Defendant Properties and conceal the fact that Perevalov was the true beneficial owner of the Defendant Properties.

BASIS FOR FORFEITURE

43. Pursuant to 18 U.S.C. § 981(a)(1)(C), “[a]ny property, real or personal, which constitutes or is derived from proceeds traceable to a violation of . . . any offense constituting ‘specified unlawful activity’ . . . , or a conspiracy to commit such offense” is subject to forfeiture to the United States. A “specified unlawful activity” is defined in 18 U.S.C. § 1956(c)(7)(D) to include a violation of IEEPA.

44. Pursuant to 18 U.S.C. § 1956(a)(1)(A)(i), it is a federal crime to, “knowing that the property involved in a transaction represents the proceeds of some form of unlawful activity, conduct[] or attempt[] to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity . . . with the intent to promote the carrying on of specified unlawful activity[.]”

45. Pursuant to 18 U.S.C. § 1957, it is a federal crime to “knowingly engage[] or attempt[] to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from specified unlawful activity[.]”

46. Pursuant to 18 U.S.C. § 1956(h), it is a federal crime to conspire to commit any offense in violation of 18 U.S.C. §§ 1956 or 1957.

FIRST CLAIM
Proceeds of IEEPA Violations
18 U.S.C. § 981(a)(1)(C)

47. The factual allegations in paragraphs 1 to 46 are re-alleged and incorporated by reference herein.

48. The Defendant Properties constitute or were derived from proceeds traceable to IEEPA offenses in violation of 50 U.S.C. 1701, *et seq.*, or a conspiracy to commit such offenses.

49. Accordingly, the Defendant Properties are subject to forfeiture to the United States under 18 U.S.C. § 981(a)(1)(C).

SECOND CLAIM
Property Involved in Money Laundering Conspiracy
18 U.S.C. § 981(a)(1)(A)

50. The factual allegations in paragraphs 1 to 46 are re-alleged and incorporated by reference herein.

51. As set forth above, the Defendant Properties were involved in transactions or attempted transactions in a conspiracy to commit an offense in violation of 18 U.S.C. §§ 1956 or 1957, and/or constitute property traceable to such property.

52. Accordingly, the Defendant Properties are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

THIRD CLAIM
Property Involved in Promotion Money Laundering
18 U.S.C. § 981(a)(1)(A)

53. The factual allegations in paragraphs 1 to 46 are re-alleged and incorporated by reference herein.

54. As set forth above, the Defendant Properties were involved in transactions or attempted transactions with the intent to promote the carrying on of specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i), and/or constitute property traceable to such property.

55. Accordingly, the Defendant Properties are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

FOURTH CLAIM
Property Involved in Laundering Transactions Greater Than \$10,000
18 U.S.C. § 981(a)(1)(A)

56. The factual allegations in paragraphs 1 to 46 are re-alleged and incorporated by reference herein.

57. As set forth above, the Defendant Properties were involved in transactions in property of a value greater than \$10,000 that was derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and/or constitutes property traceable to such property.

58. Accordingly, the Defendant Properties are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

CONCLUSION

WHEREFORE, Plaintiff, the United States of America requests that notice of this action be provided to persons known or thought to have an interest in or right against the Defendant Properties; that the Defendant Properties be forfeited and condemned to the United States of America; and for such other and further relief as this Court may deem just, necessary and proper.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

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VERIFICATION

I declare under penalty of perjury, that I am a Special Agent with the Federal Bureau of Investigation (“FBI”). The foregoing factual allegations are true and correct to the best of my knowledge and belief. The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as an FBI Special Agent.

Executed this 21 day of February, 2024.



JARED WESLEY, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

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.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

DEFENDANTS

Real property located at 10295 Collins Avenue, Unit 1616, Bal Harbour, Florida 33154; and Real property at 10295 Collins Avenue, Unit 1617, Bal Harbour, Florida 33154

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

County of Residence of First Listed Defendant N/A (IN U.S. PLAINTIFF CASES ONLY)

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Marx P. Calderon, 99 N.E. 4th Street, Miami, Florida 33132 Tel: (305) 961-9036

Attorneys (If Known)

N/A

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

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

- 1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party) 2 U.S. Government Defendant 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 2 2 Incorporated and Principal Place of Business In Another State 3 3 Foreign Nation

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

Grid of categories for nature of suit: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PRISONER PETITIONS, LABOR, IMMIGRATION, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

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

- 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO JUDGE: DOCKET NUMBER:

VII. CAUSE OF ACTION 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C) LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE 2/21/2024 SIGNATURE OF ATTORNEY OF RECORD Marx P. Calderon

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.C.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; 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. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an “X” in one of the seven 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.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

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.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge’s decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. 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

VIII. 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 dollar amount (in thousands of dollars) 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.

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

REAL PROPERTY LOCATED AT 10295 COLLINS AVENUE,
UNIT 1616, BAL HARBOUR, FLORIDA 33154; and

REAL PROPERTY LOCATED AT 10295 COLLINS AVENUE,
UNIT 1617, BAL HARBOUR, FLORIDA 33154.

Defendants *in rem*.

CIVIL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? __ Yes No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? __ Yes No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? __ Yes No

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: s/ Marx P. Calderón
Marx P. Calderón
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

REAL PROPERTY LOCATED AT 10295 COLLINS AVENUE,
UNIT 1616, BAL HARBOUR, FLORIDA 33154; and

REAL PROPERTY LOCATED AT 10295 COLLINS AVENUE,
UNIT 1617, BAL HARBOUR, FLORIDA 33154.

Defendants *in rem*.

**NOTICE OF VERIFIED COMPLAINT FOR FORFEITURE *IN REM*
AGAINST REAL PROPERTY**

To: 1616 COLLINS LLC, RENATA PEREVALOVA, AND ALL OTHER PERSONS WHO
MAY CLAIM INTEREST IN THE DEFENDANT PROPERTIES

1. DATE OF NOTICE: February 22, 2024

2. FORFEITURE COMPLAINT: On February 22, 2024, the United States of
America filed a Verified Complaint for Forfeiture *in Rem* seeking forfeiture, pursuant to 18 U.S.C.

§§ 981(a)(1)(A) and 981(a)(1)(C), in the United States District Court for the Southern District of

Florida against the following real properties:

Units 1616 and 1617, of 10295 COLLINS AVENUE HOTEL
CONDOMINIUM, a condominium, according to the Declaration of
Condominium thereof, as recorded in the Official Records Book 26093,
Page 3225, of the Public Records of Miami-Dade County, Florida.

Address: 10295 Collins Avenue, Units 1616 and 1617, Bal Harbour Florida
33154

PARCEL ID Nos: 12-2226-046-1230 and 12-2226-046-1080.

3. FILING OF A VERIFIED CLAIM: Pursuant to Rule G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, in order to avoid forfeiture of any of the Defendant Properties, any person who asserts an interest in any of the Defendant Properties **must** file a verified claim no later than **35** days after the date of this notice or the date of delivery, if personally served.

4. CONTENTS OF VERIFIED CLAIM: Pursuant to Rule G(5)(a), the claim must (A) identify the specific property claimed; (B) identify the claimant and state the claimant's interest in the property; (C) be signed by the claimant under penalty of perjury (*see* 28 U.S.C. § 1746).

5. FILING OF AN ANSWER: If you file a verified claim, you **must** then file an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days after filing of the verified claim.

6. FILING WITH COURT AND SERVICE ON UNITED STATES: The verified claim, answer, or other responsive pleadings must be filed with the Clerk of the Court, United States District Court for the Southern District of Florida, Wilkie D. Ferguson, Jr., U.S. Courthouse, 400 North Miami Avenue, Miami, Florida 33128, and a copy of said Claim, Answer, or responsive pleading with any attachments must be sent to Marx P. Calderón, Assistant United States Attorney 99 N.E. 4th Street, 7th Floor, Miami, Florida 33132.

7. In accordance with 18 U.S.C. § 985(c)(1)(B), this Notice shall be posted on each of the Defendant Properties and served on the title owner, along with a copy of the Verified Complaint for Forfeiture *In Rem*.

Failure to follow the requirements set forth above may result in judgment by default taken against you for the relief demanded in the Complaint. You may wish to seek legal advice to protect your interests.

Respectfully submitted,

**MARKENZY LAPOINTE
UNITED STATES ATTORNEY**

By: *s/ Marx P. Calderón*
Marx P. Calderón
Assistant United States Attorney
Court ID No. A5502700
99 N.E. 4th Street, 7th Floor
Miami FL, 33132-2111
Telephone: (305) 961-9036
E-mail: Marx.Calderon@usdoj.gov

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

REAL PROPERTY LOCATED AT 10295 COLLINS AVENUE,
UNIT 1616, BAL HARBOUR, FLORIDA 33154; and

REAL PROPERTY LOCATED AT 10295 COLLINS AVENUE,
UNIT 1617, BAL HARBOUR, FLORIDA 33154.

Defendants *in rem*.

**NOTICE OF VERIFIED COMPLAINT FOR FORFEITURE *IN REM*
AGAINST REAL PROPERTY**

To: 1616 COLLINS LLC, RENATA PEREVALOVA, AND ALL OTHER PERSONS WHO
MAY CLAIM INTEREST IN THE DEFENDANT PROPERTIES

1. DATE OF NOTICE: February 22, 2024

2. FORFEITURE COMPLAINT: On February 22, 2024, the United States of
America filed a Verified Complaint for Forfeiture *in Rem* seeking forfeiture, pursuant to 18 U.S.C.

§§ 981(a)(1)(A) and 981(a)(1)(C), in the United States District Court for the Southern District of

Florida against the following real properties:

Units 1616 and 1617, of 10295 COLLINS AVENUE HOTEL
CONDOMINIUM, a condominium, according to the Declaration of
Condominium thereof, as recorded in the Official Records Book 26093,
Page 3225, of the Public Records of Miami-Dade County, Florida.

Address: 10295 Collins Avenue, Units 1616 and 1617, Bal Harbour Florida
33154

PARCEL ID Nos: 12-2226-046-1230 and 12-2226-046-1080.

3. FILING OF A VERIFIED CLAIM: Pursuant to Rule G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, in order to avoid forfeiture of any of the Defendant Properties, any person who asserts an interest in any of the Defendant Properties **must** file a verified claim no later than **35** days after the date of this notice or the date of delivery, if personally served.

4. CONTENTS OF VERIFIED CLAIM: Pursuant to Rule G(5)(a), the claim must (A) identify the specific property claimed; (B) identify the claimant and state the claimant's interest in the property; (C) be signed by the claimant under penalty of perjury (*see* 28 U.S.C. § 1746).

5. FILING OF AN ANSWER: If you file a verified claim, you **must** then file an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days after filing of the verified claim.

6. FILING WITH COURT AND SERVICE ON UNITED STATES: The verified claim, answer, or other responsive pleadings must be filed with the Clerk of the Court, United States District Court for the Southern District of Florida, Wilkie D. Ferguson, Jr., U.S. Courthouse, 400 North Miami Avenue, Miami, Florida 33128, and a copy of said Claim, Answer, or responsive pleading with any attachments must be sent to Marx P. Calderón, Assistant United States Attorney 99 N.E. 4th Street, 7th Floor, Miami, Florida 33132.

7. In accordance with 18 U.S.C. § 985(c)(1)(B), this Notice shall be posted on each of the Defendant Properties and served on the title owner, along with a copy of the Verified Complaint for Forfeiture *In Rem*.

Failure to follow the requirements set forth above may result in judgment by default taken against you for the relief demanded in the Complaint. You may wish to seek legal advice to protect your interests.

Respectfully submitted,

**MARKENZY LAPOINTE
UNITED STATES ATTORNEY**

By: *s/ Marx P. Calderón*
Marx P. Calderón
Assistant United States Attorney
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