

1 PHILLIP A. TALBERT
United States Attorney
2 GRANT B. RABENN
PAUL A. HEMASATH
3 KEVIN C. KHASIGIAN
Assistant U. S. Attorneys
4 2500 Tulare Street, Suite 4401
Fresno, CA 93721
5 Telephone: (559) 497-4000

6 KENNETH A. BLANCO
Acting Assistant Attorney General
7 Criminal Division, United States Justice Department
LOUISA K. MARION
8 Trial Attorney
Computer Crime and Intellectual Property Section
9 Washington, DC 20530
Telephone: (202) 514-1026

10 Attorneys for Plaintiff
11 United States of America

12
13 IN THE UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 ALEXANDRE CAZES,

20 a/k/a "Alpha02,"

a/k/a "Admin,"

21 Defendant,

22 2013 LAMBORGHINI AVENTADOR LP700-4, VIN:
23 ZHWEC1476CLA01032, BANGKOK REGISTERED
PLATE NUMBER: 4 KOR KAI TOR TUNG – 3620
24 BANGKOK, et al.,

25 Defendants-in-rem.

1:17-cv-00967-LJO-SKO

APPLICATION AND ORDER FOR
PUBLICATION

(Doc. 5)

26
27 The United States of America, Plaintiff herein, applies for an order of publication as follows:

28 1. Rule G(4) of the Supplemental Rules for Admiralty or Maritime Claims and Asset

1 Forfeiture Actions (hereafter “Supplemental Rules”) provides that the United States shall cause public
2 notice of the action to be given in a newspaper of general circulation or on the official internet
3 government forfeiture site;

4 2. Local Rule 171, Eastern District of California, provides that the Court shall designate by
5 order the appropriate newspaper or other vehicle for publication;

6 3. The defendant assets listed in Attachment A (“defendant assets”) are presently located in
7 foreign countries¹ or in government-controlled digital currency wallets.

8 4. The United States proposes that publication be made as follows:

9 a. One publication;

10 b. Thirty (30) consecutive days;

11 c. On the official internet government forfeiture site www.forfeiture.gov;

12 d. The publication is to include the following:

13 (1) The Court and case number of the action;

14 (2) The date of the seizure/posting;

15 (3) The identity and/or description of the property seized/posted;

16 (4) The name and address of the attorney for the United States;

17 (5) A statement that claims of persons entitled to possession or claiming an
18 interest pursuant to Supplemental Rule G(5) must be filed with the Court and served on the attorney for
19 the United States no later than 60 days after the first day of publication on the official internet
20 government forfeiture site; and

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 _____

28 ¹ Including, but not limited to, Thailand, Liechtenstein, St. Vincent and the Grenadines, Switzerland, Cyprus, and Antigua and Barbuda.

1 (6) A statement that answers to the Complaint or a motion under Rule 12 of the
2 Federal Rules of Civil Procedure (“Fed. R. Civ. P.”) must be filed and served within 21 days after the
3 filing of the claims and, in the absence thereof, default may be entered and condemnation ordered.

4 Dated: 8/8/2017

PHILLIP A. TALBERT
United States Attorney

5
6 By: /s/ Kevin C. Khasigian
7 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

8
9 **ORDER**

10
11 IT IS SO ORDERED.

12
13 Dated: August 10, 2017

/s/ Sheila H. Oberto
UNITED STATES MAGISTRATE JUDGE

Attachment A

1. Lamborghini Aventador LP700-4, VIN: ZHWEC1476CLA01032, Bangkok Registered Plate Number: 4 Kor Kai Tor Tung – 3620 Bangkok,
2. Porsche Panamera S, VIN: WP0ZZZ97ZGL040783, Bangkok Registered Plate Number: 5 Kor Kai Tor Tung – 1923 Bangkok,
3. Mini Cooper, Bangkok Registered Plate Number: 5 Kor Kai Phophan – 2319 Bangkok,
4. BMW Motorcycle, License Plate Number: 5 Kokai Nonen – 2182 Bangkok,
5. All monies, funds, and credits on deposit at Bangkok Bank, held in the name of Alexandre CAZES, including but not limited to accounts 228-2-15349-9, 228-2-15092-5 and 033-0-79683-0,
6. All monies, funds, and credits on deposit at Bangkok Bank, held in the name of Sunisa THAPSUWAN, including but not limited to account 935-7-00049-7,
7. All monies, funds, and credits on deposit at Bank of Ayudhya (Krungsri), held in the name of Alexandre CAZES, including but not limited to account 7241012818,
8. All monies, funds, and credits on deposit at Kasikorn Bank, held in the name of Bitcoin Company Ltd., including but not limited to account 797-223495-2,
9. All monies, funds, and credits associated with Alexandre CAZES and Sunisa THAPSUWAN's virtual currency exchange accounts with Bitcoin Company Ltd. in Thailand, which are on deposit with Bitcoin Company Ltd.,
10. All monies, funds, and credits on deposit at Kasikorn Bank, held in the name of Alexandre CAZES, including but not limited to accounts 007-8-49384-4 and 007-3-86968-4,
11. All monies, funds, and credits on deposit at Kasikorn Bank, held in the name of Sunisa THAPSUWAN, including but not limited to account 073-2-53870-4,
12. All monies, funds, and credits on deposit at Siam Commercial Bank, held in the name of Alexandre CAZES, including but not limited to accounts 156-1-12047-0 and 156-2-73157-5,
13. All monies, funds, and credits on deposit at Siam Commercial Bank, held in the name of Sunisa THAPSUWAN, including but not limited to account 192-2-06800-9,
14. All monies, funds, and credits on deposit at Bank Alpinum AG in Liechtenstein, held in the name of Alexandre CAZES,
15. All monies, funds, and credits on deposit at Loyal Bank Limited, held in the name of "Brilliant Landmark Concept Limited" and/or Alexandre CAZES,
16. All monies, funds, and credits associated with Alexandre CAZES' and/or Sunisa THAPSUWAN's virtual currency exchange accounts with Bitcoin Suisse AG, in Baar, Switzerland,
17. Real property located at 514, Soi 28 off Phutta Monthon Sai 3 Road Khwaeng Sala Thammasop, Khet Thawee Watthana, Bangkok, Thailand

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 18. Real property located at 522, Soi 28 off Phutta Monthon Sai 3 Road Khwaeng Sala Thammasop, Khet Thawee Watthana, Bangkok, Thailand
- 19. Real property located at Villa Torcello, 28/18 Moo 6, Kamala, Kathu, Phuket 83150, Thailand,
- 20. Real property located at 1399/8 Granada Pin Klao-Phet Kasem Housing Estate, Kanchana Phisk Road, Khwaeng Bang Khae Nua, Khet Bang Khae, Bangkok, Thailand,
- 21. Real property located at Villa 1 at the Sea Pearl Residences, Paralimni Famagusta, Cyprus,
- 22. Real property located at #302 Nonsuch Bay Condominiums (C-200080017, LOT #9), St. Phillips South, Antigua and Barbuda,
- 23. Approximately 1,605.0503851 Bitcoins seized from Alexandre CAZES and moved to secure government-controlled Bitcoin addresses:
18yWfVddqNrGE966zwXTpyJgYJgr82SvMs (837.81699505 BTC) and
1NXoCQLQqgaQU2cpBGtXTZ8NVm1cGnYD6p (721.76756789 BTC),
- 24. Approximately 8,309.271639 Ethereum seized from Alexandre CAZES and moved to secure government-controlled Ether address:
0x41CC3B9213DE6FF4a8Ea85306326B00D18145E65,
- 25. Approximately 3,691.98 Zcash seized from Alexandre CAZES and moved to secure government-controlled address t1UAr3j9Hyt1oCMygsSLr7S3pLMuKBoNgLg,
- 26. Any and all Monero seized from Alexandre CAZES' personal computer and wallet addresses,
- 27. Approximately 293.79476862 Bitcoin moved from server 3203 into secure government-controlled Bitcoin address 1BBTk41STWuffTfvRrsovX7X8puhDpFofk,
- 28. Approximately 43.05943697 Bitcoin moved from server 3164 into secure government-controlled Bitcoin address 1BBTk41STWuffTfvRrsovX7X8puhDpFofk,
- 29. Approximately 360.384477 Ethereum moved from server 8131 into secure government-controlled Ether address 0x356114879f72f4bFFB343B0003DEED7944B4D31d,
- 30. Approximately 11,993.15882 Monero moved from server 10073 into secure government-controlled Monero address
47gSEo9DJCZfsYrPijJ1QpLksePfiNoBA6mUtQXAW6xBVz6GwEkgYaQf
2PDBhm5fXUfozLWYpCxK2FmyZ29bWmZBKHXqKZo,
- 31. Any and all cryptocurrency contained in wallet files residing on AlphaBay servers, including the servers assigned the internet protocol addresses:
XX.XXX.XX.146 ("Server 11205"), XX.XXX.XXX.163 ("Server 6223"),
XXX.XXX.XXX.225 ("Server 3203a"), XXX.XXX.XXX.61 ("Server 3203b"),
XXX.XXX.XXX.77 ("Server 3164"), XX.XXX.XXX.130 ("Server 8131"),
XX.XXX.XX.168 ("Server 10073"), and
- 32. Any and all cryptocurrency seized from the personal computer, wallet addresses, and media of Alexandre CAZES.