

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

The Domain Name EGYPT.COM,
Defendant *In Rem*.

Civil No.:

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *in Rem* pursuant to Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

Nature of the Action

1. This is a civil action *In Rem* pursuant to:
 - a. 18 U.S.C. § 981(a)(1)(A) “The following property is subject to forfeiture to the United States... Any property, real or personal, involved in a transaction or attempted transaction in violation of section 1956, 1957 or 1960 of this title, or any property traceable to such property.”

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 18 U.S.C. § 981(a)(1)(A).

3. Venue is proper in this district, and the Court has *In Rem* jurisdiction over the defendant currency pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the facts and omissions giving rise to the forfeiture occurred in this district.

The Defendant in Rem

4. The Defendant *in Rem* is the domain name EGYPT.COM. The Defendant *in Rem* is within the possession, custody, or control of the United States.

Facts

5. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent Geoffrey Gordon of the Homeland Security Investigations (HSI).

Claim for Relief

6. The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendant *in Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendant *in Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United

States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

7. Pursuant to Supplemental Rule G(5)(a)(ii) of the Supplemental Rules of Admiralty or Maritime Claims and Asset Forfeiture Actions in order to avoid forfeiture of the defendant property, any person who asserts an interest in the defendant property must file a verified claim within 35 days after the date this notice is sent, if the notice is delivered by mail, or within 35 day of the date of delivery, if the notice is personally served and not sent by mail. 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; and (C) be signed by the claimant under penalty of perjury. If a verified claim is filed, then an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure must be filed within 21 days after filing the verified claim. The verified claim and answer **must** be filed with the Office of the Clerk, United States District Court for the District of Puerto Rico, Clemente Ruiz Nazario US Courthouse, 150 Carlos Chardón Street, San Juan, PR 00918. A copy of the claim and answer or motion must be sent to Andres Orr, Assistant United States Attorney, Torre Chardón, Suite 1201, 350 Carlos Chardón Street, San Juan, Puerto Rico 00918.

8. Failure to follow the requirements set forth above may result in judgment by default for relief demanded in the Complaint.

9. Rule G (9) of the Supplemental Rules of Civil Procedure provides that trial is to the Court unless any party demands trial by jury under Rule 38 of the Federal Rule of Civil

Procedure. The United States submits to the Court and the parties that it may demand a trial by jury on any other factual issues triable by jury.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of July 2026.

HECTOR E. RAMIREZ-CARBO
Acting United States Attorney

/s/ Andres Orr
Andres Orr
Assistant United States Attorney
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VERIFIED DECLARATION

I, Andres Orr, Assistant United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Homeland Security Investigations (HSI); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 21st day of July 2026.

/s/ Andres Orr

Andres Orr

Assistant United States Attorney –

VERIFICATION

I, Geoffrey Gordon, depose and say that I am a Special Agent with Homeland Security Investigations and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify pursuant to penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in Philadelphia, Pa, this 21 day of July 2026.



Geoffrey Gordon, Special Agent
Homeland Security Investigations (HSI)