

**IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CHANCERY DIVISION**

George Zambrana, an individual, on behalf of
himself and all others similarly situated,

2025 CH 11647

Plaintiff,

v.

Jane Doe a/k/a "Jessica, and John Does 1 - 25,
Defendants.

ORDER

This matter comes before the Court on the motion of plaintiff, George Zambrana ("Zambrana"), for alternate service under 735 ILCS 5/2-203.1 ("Section 203.1"). For the reasons stated, the Motion is granted with instructions as set forth below.

I. Background

In his complaint, Zambrana alleges he was scammed via a "pig butchering" scheme whereby a woman identified as "Jessica" cultivated his trust and enticed him to deposit funds in fraudulent cryptocurrency platforms, which were then siphoned off to digital wallets controlled by the defendants. Cryptocurrency wallets are anonymized. Ultimately, Zambrana was unable to extract his funds and Jessica ceased communications.

Zambrana retained a forensic cryptocurrency expert to trace the stolen funds. Plaintiff alleges the expert has identified the last known "wallets" where the funds were deposited.

Due to the anonymized nature of the wallets, Zambrana is unable to serve defendants via a physical address, and therefore, he moves to serve them using an alternate method called Input Data Message ("IDM"), which involves inserting a plain-language message into the data field on the Service Transaction on the Ethereum blockchain (that is, on the cryptocurrency's (Ethereum's) digital ledger (blockchain)). Zambrana intends this plain-language message to include a URL to the court's docketed materials in this case, including the summons and complaint.

The court must determine whether Zambrana has met the statutory requirements for special service under Section 203.1: that service under Section 203(a) is impractical, and whether the proposed method of service meets due process requirements.

I. Statutory Requirements of Special Service Under Section 2-203.1

A. Impracticality

Section 203(a) states: “service of summons upon an individual defendant shall be made (1) by leaving a copy of the summons with the defendant personally, (2) by leaving a copy at the defendant’s usual place of abode, with some person of the family or a person residing there”

Section 203.1 provides for service consistent with due process when the standard method of service is impractical:

If service upon an individual defendant is impractical under items (1) and (2) of subsection (a) of Section 2-203, the plaintiff may move, without notice, that the court enter an order directing a comparable method of service. The motion shall be accompanied with an affidavit stating the nature and extent of the investigation made to determine the whereabouts of the defendant and the reasons why service is impractical under items (1) and (2) of subsection (a) of Section 2-203, including a specific statement showing that a diligent inquiry as to the location of the individual defendant was made and reasonable efforts to make service have been unsuccessful. The court may order service to be made in any manner consistent with due process.

Here, Zambrana argues service is impractical because, after investigation, no names or physical addresses are obtainable. The motion includes the affidavit of his expert, Adam Zarazinski, chief executive officer of Inca Digital, that explains how he traced the cryptocurrency and why the requested form of service would “likely result in actual notice” to the entities in control of the wallets in which Zambrana’s funds are believed to be located.

The Court finds the standard method of service is impractical and Zambrana has satisfied the statutory requirements for alternative service.

B. Due Process

Next, the Court must decide whether Zambrana’s requested method is “consistent with due process.” 735 ILCS 5/2-203.1. Under Section 203.1, the Court may order service in any matter it finds that provides proper notice and an opportunity to be heard. *See Schmitt v. Schmitt*, 2002 U.S. Dist. LEXIS 1243, *13-14 (N.D. Ill. Jan. 25, 2002) (holding that the trial court correctly allowed special service where that service was reasonably calculated to provide the defendant notice of the pending action and affording defendant an opportunity to be heard).

As stated above, Zambrana proposes to serve defendants by dropping a plain-language message in a Service Transaction that includes a link to a website with the Court's docket. This can be done using the IDM method he suggests. Xiong, et al., *Talking Transactions: Decentralized Comm. Through Ethereum Input Data Messages (IDMs)*, arXiv, May 30, 2025, at col. 2, <https://arxiv.org/abs/2505.24724>. This article states: “[the] input data field [in the Service Transaction] can be repurposed by users to embed arbitrary natural language messages directly into the transactions.” *Id.* The article further states, “users can send messages, convey opinions, and exchange information via Input Data Messages (IDMs).” *Id.* This information comports with the statements made by Zarazinski in his affidavit.

However, the Court finds notice requires more than just dropping a link to the court docket into the data field on the Service Transaction. Zambrana shall also include text that provides defendants with critical information even if the URL does not work or they do not access it. In addition to the link to the actual URL to the website with the Court's docket information, the message shall contain the statement: “You are being sued in Cook County, Illinois. This URL provides access to the Court's docket information: [add URL]. The next court status date is [date, time] using the following Zoom information: [Zoom information].”¹

II. Conclusion

For the reasons stated above, Zambrana's motion for special service is granted, with the added requirement stated above.

This matter is set for status on service of process on February 11, 2026, at 9:30 a.m., via Zoom videoconference. The previously entered Temporary Restraining Order shall be extended to February 11, 2026, at 5:00 p.m.

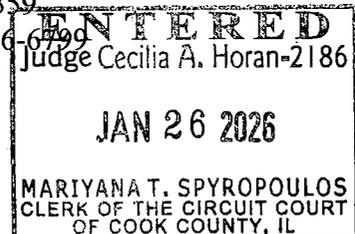
ENTER:

/s/ Cecilia A. Horan Judge No. 2186

Meeting ID: 956 5899 1093

Password: 129359

Dial-in: 312-626-6799



Order of the Court

¹ Of course, the correct information must be provided within the brackets.