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Mariyana T. Spyropoulos  
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

GEORGE ZAMBRANA, an individual, )  
on behalf of himself and all others similarly )  
situated )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
JANE DOE a/k/a "JESSICA" )  
and JOHN DOES 1-25, )  
 )  
Defendants. )

Case No.: 2025CH11647  
Hon. Cecilia A. Horan

**PLAINTIFF’S MOTION TO MODIFY THE TEMPORARY RESTRAINING ORDER**

Plaintiff George Zambrana (“Plaintiff”) respectfully moves this Court to modify the temporary restraining order (“TRO”) entered by this Court on December 18, 2025, extended on December 29, 2025, extended on January 8, 2026, extended on January 15, 2026, extended on January 26, 2026, extended on February 11, 2026, extended on March 9, 2026, and extended on May 11, 2026 until June 17, 2026. As explained below, subsequent investigation by Plaintiff’s forensic blockchain expert has revealed that certain Deposit Wallets are no longer reasonably connected to the pig-butcherer fraud scheme at issue. Because the factual predicates supporting the freeze as to these wallets have changed, modification of the injunction is appropriate and within the Court’s inherent authority.

**RELEVANT BACKGROUND**

1. This action arises from a cryptocurrency-based fraud scheme commonly known as a “pig butchering” scheme, through which Plaintiff’s digital assets were misappropriated and laundered through blockchain transactions. On December 18, 2025, and based on the best information then available, the Court entered a TRO freezing numerous cryptocurrency wallets

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across multiple exchanges in order to preserve the status quo and prevent dissipation of assets traceable to the fraud (“Deposit Wallets”).

2. At the time the TRO was entered, Plaintiff relied on preliminary blockchain tracing by Inca Coalition (“Inca”) that reasonably suggested that certain Deposit Wallets were connected to scam wallets, also known as Pivot Wallets, used by the perpetrators of the scheme. Pivot Wallet is an address that “consolidates stolen funds from multiple victims before dispersing them to final deposit addresses. These Pivots Wallets are designed to obscure the original source of funds and facilitate layering to evade detection.” **Exhibit A, Declaration of Adam Zarazinsky**, ¶ 21.

3. The Deposit Wallets at issue in this motion are as follows:

<b>Exchange</b>	<b>Wallet Address</b>
<b>Binance</b>	0xf7E4365FBA99F02191503B5b4Fa7E7C831fC69a4
<b>Binance</b>	0x8E5D9D1599877028840f88cac602392e441ED3eF
<b>Binance</b>	0x7d4d8056871FDA21E39C8bd6aF4247F19De2042b
<b>Binance</b>	0x9B92DB434F48480d8ebdbE42046D5a2AcEd0eF62
<b>Binance</b>	0x61b7e18BA8bA0413a9ae61CBb263507aFb53B7Cc
<b>Binance</b>	0x1e1D870D6781793EbA4F5818E67d5D443a2d58F9
<b>Binance</b>	0x664A4D0931E79F789Fd15AFa8be8B1cd33F0B4C1
<b>Binance</b>	0x2a19A8a2Ab65881A342981B192824fDF6ceF3665
<b>Binance</b>	0x4D4d0A06a33c82A3EBa004B67Bd717DB6b243489
<b>Binance</b>	0xBf5C76FcBBC7D5595dBf746eEb89a99bb6b258D0
<b>Binance</b>	0xAA578136a26b0bd7C7554cB954E976Db2c5c2EA4
<b>Binance</b>	0x3F4b069B8b473F09BE7fC75aca643fF72cb18fE7
<b>Coinbase</b>	0xA97cF97e6a7567ceA0fe69DF5F59268636733fe8

<b>Coinbase</b>	0x6e7496804654d47D1Ffd3ABBe1C731276fe09c37
<b>Coinbase</b>	0xf9E8677236BaD06A8cF00D715c0A52Ab60a61fd7
<b>Coinbase</b>	0xb3B6F9A495bc265C9cb19C4318B8858B84547De7
<b>Coinbase</b>	0xf1E639574dFE745b93817452d64c25c9788dc77
<b>Coinbase</b>	0xd74F8Dbf44f5aF98608476cf17D1814B0c2ee8eb
<b>Crypto.com</b>	0x1fcB5c16B7A1AB3DE79b1e3Cd920DED8f037EBa9
<b>Kraken</b>	0x3320beBf3c5E9868b4BA3ccc0fc40e737da030a7
<b>Kraken</b>	0x530860F71Ed2333a309574ed4fEfE5edfd59982A
<b>KuKoin</b>	0x6320EA8DA6315F971dBE9c923Dbc739e1eAa8c10
<b>KuKoin</b>	0x7dd672a29b71026925f9b1d4BE42370111B1b957
<b>OKX</b>	0xa3C1D72080d22ba79532262391c844549beC4989
<b>OKX</b>	0x0DEbbF4221856638dce98EFA43b10938084d80F3
<b>OKX</b>	0xE45787ef14dc7F295365154df72C41e79f12407d
<b>OKX</b>	0xf5fFe32272031aB2fBe850d1A22C18057467AF49

4. The freeze on these Deposit Wallets was sought in good faith and supported by the urgent need to prevent further movement of assets while the investigation continued. At the time Plaintiff sought the TRO, it appeared that these wallets were connected to the Pivot Wallets.

5. Since entry of the TRO, Inca has continued extensive diligence and analysis. That continued investigation has materially refined the understanding of the transaction flows and wallet relationships involved in the scheme.

6. As a result, Plaintiff now seeks to modify the TRO to unfreeze the above listed Deposit Wallets that no longer appear to be connected to the scam wallets previously identified.

## APPLICABLE LEGAL STANDARDS

7. Illinois law is clear that courts retain ongoing authority over their own injunctive orders and may modify them when circumstances change.

8. “[C]ircuit courts have jurisdiction, or inherent power, to modify or dissolve their own injunctions...” *Am. Inst. of Real Est. Appraisers of Nat. Ass'n of Realtors v. Nat'l Real Est. Ass'n, Inc.*, 191 Ill. App. 3d 867, 869 (1989). This authority exists to ensure that injunctions remain equitable, accurate, and appropriately tailored as a case develops.

9. “Where the grounds and reasons for which the injunction was granted no longer exist, by reason of changed conditions, it may be necessary to alter the decree to adapt it to such changed conditions, or to set it aside altogether, as where there is a change in the controlling facts on which the injunction rests, or where the applicable law, common or statutory, has in the meantime been changed, modified, or extended. On application to modify the decree, the inquiry is simply whether changes since its rendition are of sufficient importance to warrant such modification.” *Bank of Wheaton v. Vill. of Itasca*, 178 Ill. App. 3d 626, 632–33 (1989).

## CHANGED FACTS WARRANT MODIFICATION OF THE TRO

10. The TRO was entered at an early stage of the investigation, when Plaintiff was acting to prevent imminent dissipation of assets based on preliminary tracing. Since that time, Inca has continued to conduct detailed analysis of transaction flows, wallet clustering, and intermediary movements.

11. Blockchain investigations are inherently dynamic. As additional data is analyzed and transaction paths are reconstructed with greater precision, earlier assumptions may be confirmed, refined, or—where appropriate—discarded.

12. Here, that continued diligence has led to a clearer and more reliable understanding of which wallets are actually connected to the scam wallets central to this case.

13. Based on Inca's updated analysis, approximately twenty-seven Deposit Wallets frozen pursuant to the TRO no longer appear to be connected to the pig-butchered Pivot Wallets previously identified by Inca.

14. Accordingly, the factual basis that initially justified freezing those wallets no longer exists.

**THE REQUESTED MODIFICATION PRESERVES THE INTEGRITY OF THE  
INJUNCTION**

15. Plaintiff is not seeking to dissolve the TRO wholesale or weaken the Court's ability to preserve assets connected to the pig butchering scheme. To the contrary, Plaintiff seeks to narrow the TRO so that it applies only where it is factually justified.

16. Maintaining freezes on wallets that are no longer connected to the scheme would not preserve the status quo—it would extend the injunction beyond its equitable purpose.

17. Importantly, there has been no demonstrated harm arising from the initial freeze: (1) no owners of the frozen wallets have appeared in this Court to contest the TRO<sup>1</sup>; (2) no claims of wrongful restraint or prejudice have been raised; and (3) no third parties have been required to litigate or intervene.

18. The absence of such challenges underscores that the modification will not disrupt settled expectations or impair any party's rights.

19. Plaintiff brings this motion promptly upon learning that the factual basis for freezing these wallets has changed. This reflects responsible litigation conduct and ongoing respect for the Court's equitable authority.

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<sup>1</sup> One exception is that on January 14, 2025, the owner of Coinbase wallet requested that the freeze on his wallet be lifted. The freeze was lifted on January 15, 2025.

20. Rather than allowing an overinclusive TRO to remain in place, Plaintiff seeks to ensure that the relief ordered by the Court remains accurate, fair, and supported by current evidence.

21. Plaintiff's forensic expert continues to conduct due diligence and investigation into the broader pig-butcher scheme, including identifying additional scam wallets, tracing asset movements, and refining the evidentiary record.

22. This continued effort is precisely why Plaintiff now has better, more reliable information than was available at the time the TRO was entered. Modification of the TRO in light of that information is not only permissible—it is appropriate.

WHEREFORE, Plaintiff respectfully requests that the Court grant its Motion to Modify the Temporary Restraining Order.

Respectfully submitted,

*/s/ Taras Garapiak*

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