Law Office of Navin R. Pasem, P.L.

Navin R. Pasem, Esq.*

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July 1, 2025

Notice Via Blockchain

John Doe 1, John Doe 2, John Doe 3, and Does 4 through 200

Re: Stolen Bitcoin and Ethereum via Coinbase Wallet

Dear John Doe 1, John Doe 2, John Doe 3 and Does 4 through 200:

Please be advised that this office represents the principal of the law firm, Mr. Navin Pasem. This letter is being sent to you in accordance with Section 772.11, Florida Statutes.

On February 25, 2025, you initiated a cryptocurrency scam and stole certain Bitcoin and Ethereum holdings from Mr. Pasem valued at \$607,492.00. You manipulated Mr. Pasem into believing you were Coinbase security personnel and that there was a security concern with his Exchange account. As a result, you requested that he transfer his holdings from the Coinbase Exchange to a specific Coinbase wallet. In fact, there was no security concern and you had access to this Wallet unbeknownst to Mr. Pasem. Once Mr. Pasem transferred the funds into the Wallet, you immediately stole all funds for your own purposes.

You are hereby notified that your actions constitute theft under Florida law for which Mr. Pasem has a right of recovery against you. As a result, in accordance with Florida Statute Section 772.11, demand is hereby made upon you for damages in an amount equal to three times the amount of the property, specifically, \$1,822,476.00.

If payment is made in accordance with this demand within thirty (30) days after the receipt hereof, you will be given a written release from further civil liability for the specific act of theft referenced herein. Should, however, you fail to make payment as demanded herein, you may be held liable to our client for treble damages, court costs, and attorney's fees in a civil action.

Please govern yourselves accordingly.

Sincerely,

Navin R. Pasem, Esq.

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Select Year: 2024 ✔ Go

The 2024 Florida Statutes (including 2025 Special Session C)

<u>Title XLV</u> <u>Chapter 772</u> <u>View Entire Chapter</u>

TORTS CIVIL REMEDIES FOR CRIMINAL PRACTICES

772.11 Civil remedy for theft or exploitation.—

- (1) Any person who proves by clear and convincing evidence that he or she has been injured in any fashion by reason of any violation of ss. 812.012-812.037 or s. 825.103(1) has a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and court costs in the trial and appellate courts. Before filing an action for damages under this section, the person claiming injury must make a written demand for \$200 or the treble damage amount of the person liable for damages under this section. If the person to whom a written demand is made complies with such demand within 30 days after receipt of the demand, that person shall be given a written release from further civil liability for the specific act of theft or exploitation by the person making the written demand. Any person who has a cause of action under this section may recover the damages allowed under this section from the parents or legal guardian of any unemancipated minor who lives with his or her parents or legal guardian and who is liable for damages under this section. Punitive damages may not be awarded under this section. The defendant is entitled to recover reasonable attorney's fees and court costs in the trial and appellate courts upon a finding that the claimant raised a claim that was without substantial fact or legal support. In awarding attorney's fees and costs under this section, the court may not consider the ability of the opposing party to pay such fees and costs. This section does not limit any right to recover attorney's fees or costs provided under any other law.
- (2) For purposes of a cause of action arising under this section, the term "property" does not include the rights of a patient or a resident or a claim for a violation of such rights.
- (3) This section does not impose civil liability regarding the provision of health care, residential care, long-term care, or custodial care at a licensed facility or care provided by appropriately licensed personnel in any setting in which such personnel are authorized to practice.
- (4) The death of an elderly or disabled person does not cause the court to lose jurisdiction of any claim for relief for theft or exploitation when the victim of the theft or exploitation is an elderly or disabled person.
- (5) In a civil action under this section in which an elderly or disabled person is a party, the elderly or disabled person may move the court to advance the trial on the docket. The presiding judge, after consideration of the age and health of the party, may advance the trial on the docket. The motion may be filed and served with the civil complaint or at any time thereafter.

History.-s. 3, ch. 86-277; s. 47, ch. 88-381; s. 5, ch. 89-303; s. 1181, ch. 97-102; s. 2, ch. 2002-195; s. 8, ch. 2014-200.

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