

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA**

NAVIN PASEM,

Plaintiff,

Case No.: 25-CA-002901

v.

**JOHN DOE 1, JOHN DOE 2, JOHN DOE 3,
and DOES 4 through 200**

Defendants.

**PLAINTIFF'S SECOND RENEWED EMERGENCY EX PARTE MOTION FOR
PRELIMINARY INJUNCTIVE RELIEF WITHOUT NOTICE**

COMES NOW Plaintiff, Navin Pasem, and, pursuant to Florida Rule of Civil Procedure 1.610, respectfully submits this Second Renewed Emergency Ex Parte Motion for Preliminary Injunctive Relief Without Notice (the “Motion”) against John Doe 1, John Doe 2, John Doe 3, and Does 4 through 200 (collectively, “Defendants”). In support of this Motion, Plaintiff states the following:

INTRODUCTION

Plaintiff brings this Motion in connection with his Second Amended Verified Complaint¹ against Defendants and seeks immediate injunctive relief to preserve misappropriated cryptocurrency assets. Defendants carried out a calculated scheme to misappropriate Plaintiff’s digital assets. They impersonated Coinbase support personnel, fabricated a security threat, and manipulated Plaintiff into transferring his cryptocurrency under the false pretense of account protection. Plaintiff transferred 76.099 ETH and 4.909 BTC—valued at \$607,492.38—to wallet addresses provided by Defendants. The assets were promptly laundered through a series of transactions, including asset swaps, fragmentation, and cross-chain movement, before being deposited into custodial wallet addresses hosted at centralized cryptocurrency exchanges.

¹ The deficiency this Court noted in Plaintiff’s Amended Verified Complaint has been rectified.

Through forensic blockchain tracing conducted by Applied Technology Solutions (“ATS”), these deposit addresses were conclusively identified. They represent the final known destinations of Plaintiff’s misappropriated cryptocurrency and are detailed in Appendix A to the Complaint and authenticated in the Affirmation of Kristofer Doucette.

Plaintiff seeks a preliminary injunction to freeze the identified wallets and prevent further dissipation of the stolen assets. Immediate injunctive relief is necessary because Defendants have demonstrated a clear ability to rapidly move and obscure Plaintiff’s stolen cryptocurrency assets. Without immediate relief, the traceable funds may be withdrawn, further laundered, or rendered permanently unrecoverable, resulting in irreparable harm. Providing notice of this motion would likely result in the Defendants moving the assets further, thereby eliminating the possibility of recovery.

FACTUAL BACKGROUND

Defendants engaged in a fraudulent scheme to misappropriate cryptocurrency by impersonating Coinbase technical support. On or about February 25, 2025, Plaintiff received a text message from Defendant John Doe 1, falsely claiming to be from Coinbase Support and warning of unauthorized activity on Plaintiff’s Coinbase account. The message instructed Plaintiff to call a phone number to prevent unauthorized access.

Believing the message to be legitimate, Plaintiff called the provided number and spoke to Defendant John Doe 2, who posed as a Coinbase support agent. Defendant John Doe 2 falsely claimed that overseas actors were attempting to access Plaintiff’s account and escalated the call to Defendant John Doe 3, who posed as a fraud prevention specialist. Defendant John Doe 3 instructed Plaintiff to download the Coinbase Wallet mobile app and falsely asserted that it was a secure extension of Plaintiff’s existing Coinbase account.

Relying on Defendants’ repeated false assurances and the fabricated sense of urgency they conveyed, Plaintiff transferred 76.099 Ethereum (ETH) and 4.909 Bitcoin (BTC), valued at \$607,492.38 at the time of theft, to the wallet addresses provided by Defendant John Doe 3.

Immediately after the transfers, Plaintiff was unable to contact any of the individuals involved, and the assets were swiftly moved to other wallets beyond Plaintiff's control.

Following the theft, Plaintiff engaged Applied Technology Solutions (ATS) to investigate and trace the stolen assets. ATS used blockchain analytics tools to identify the wallets used to receive, consolidate, and disperse the misappropriated funds. The analysis confirmed that Defendants employed deliberate obfuscation techniques, including fragmentation, swap protocols, cross-chain transfers, and commingling, to conceal the origin and movement of Plaintiff's cryptocurrency. Despite these efforts, ATS successfully traced the stolen assets to deposit addresses hosted by known centralized exchanges, listed in Appendix A.

ATS's findings indicate that Defendants deliberately moved the stolen cryptocurrency through a series of wallets they controlled to obscure the funds' origins and hinder recovery. There is a high likelihood that Defendants will continue to move or dissipate the assets if they become aware of this action, thereby eliminating the possibility of recovery.

Rule 1.610(a)(1) Compliance

The instant Motion is being brought on an Ex Parte basis because there is a high likelihood that Defendants, upon receiving notice of this action, will take measures to withdraw all funds from the accounts. If Defendants withdraw the funds prior to the account being frozen, this will eliminate the possibility of recovery for the Plaintiff.

Defendants will likely withdraw the funds if they become aware that Plaintiff is seeking its relief, as they have already undertaken transactions to hide and steal Plaintiff's cryptocurrency assets. As such, pursuant to Florida Rules of Civil Procedure §1.610(a)(1)(B) notice should not be given herein because the risk of irreparable harm to the Plaintiff is exacerbated if notice of this motion is given to the Defendants. As such, counsel believes in good faith taking steps to provide notice to Defendants will cause irreparable injury, loss, damage to the Plaintiff if notice is provided prior to the issuance of injunction.

Emergency Motion Certification

For the reasons set forth above, Plaintiff respectfully submits that this Motion qualifies as an emergency. Any delay in freezing the wallet addresses identified in Appendix A increases the risk that Defendants will transfer or dissipate the assets, placing them beyond recovery and causing irreparable harm. Should the Court require a hearing on this Motion, Plaintiff and undersigned counsel are prepared to proceed and estimate that the matter can be heard in approximately 15 minutes.

MEMORANDUM OF LAW

I. LEGAL STANDARD FOR PRELIMINARY INJUNCTIVE RELIEF

The standard for temporary relief is governed by § 1.610 of the Florida Rules of Civil Procedure. Generally, a party seeking a temporary injunction must establish the following: (1) a substantial likelihood of success on the merits; (2) the likelihood of irreparable harm and the unavailability of adequate law; (3) that the threatened injury to the party seeking injunction outweighs the possible harm to the party against who an injunction is sought; and (4) that the granting of the preliminary injunction will not disserve or be adverse to the public interest. *Provident Mgmt. Corp v. City of Treasure Island*, 796 So. 2d 481, 485 (Fla. 2001); *Miami-Dade County v. Fernandez*, 905 So. 2d 213, 215 (Fla. 3d DCA 2005); Fla. R. Civ. Pro. 1.610.

The purpose of a temporary or preliminary injunction is not to resolve a dispute on the merit, rather to simply preserve the status quo until a hearing may be held when full relief may be granted. *Grant v. Robert Half International, Inc.*, 597 So.2d 801, 802 (Fla. 3d DCA 1992).

In this action, injunctive relief is appropriate because Plaintiff can clearly establish that (i) Plaintiff will suffer irreparable harm if Defendant becomes aware of the instant lawsuit and diverts the subject funds; (i) Plaintiff has no adequate remedy at law without first freezing these accounts; (iii) Plaintiff has a substantial likelihood of success on the merits; and (iv) it is in the public interest to prevent Defendants from divesting funds acquired through their scheme.

II. PRELIMINARY INJUNCTION IS NECESSARY AND WARRANTED

1. There is a Substantial Likelihood that Plaintiff Will Prevail on the Merits

Plaintiff's Complaint states that Defendants engaged in a scheme to convert cryptocurrency assets belonging to Plaintiff via deception purporting to be Coinbase technical support. The interactions between the Plaintiff and Defendants regarding the subject transactions are well documented, and there is indisputable evidence from Inca, that the Plaintiff's converted funds can be traced through the accounts Plaintiff is requesting the Court freeze.

Plaintiff will be able to show that Defendants plotted to divert Plaintiff's funds under false pretenses and scare tactics causing Plaintiff to transfer his funds to cryptocurrency wallets, which Defendants actually controlled. Allowing Defendants continued access to the subject crypto wallets will give them the opportunity to fulfill this scheme and abscond with the Plaintiff's funds. Plaintiff can show the facts of this case are sufficient to prove the causes of actions stated in the Complaint in addition to this equitable action for injunctive relief.

2. Failing to Freeze the Accounts will Cause Irreparable Harm to Which There is no other Adequate Remedy

Plaintiff will suffer irreparable harm if the Court does not allow for injunction freezing the accounts. The adequacy of remedies at law depends upon the availability of damage award.

As stated in *Jewett Orthopaedic Clinic, P.A v. White*:

The requirement that the injury be "irreparable" should not present a difficult problem. The question of whether the injury is irreparable turns on whether there is an adequate legal remedy available. 4 Pomeroy, Equity Jurisprudence § 1343 (5th Ed. Symons, 1941). Irreparable injury means, in essence, that injunction is the only practical mode of enforcement. A negative covenant, where one party promises that he will not do certain things, is an apt example. *Id* at 941-42. The supreme court observed in *Miller Mechanical* that certain types of contractual covenants, like covenants not to compete, by their nature lend themselves principally to enforcement by injunction because of the difficulty of arriving at a dollar figure for the actual damage done as the result of the breach. 300 So. 2d at 12.

Jewett Orthopaedic Clinic, P.A. v. White, 629 So. 2d 922, 927 (Fla. 5th DCA 1993). In the present case, Plaintiff has no remedy if the funds are not frozen. Crypto currency wallets are essentially digital bank accounts in which funds can be used and transferred instantly from any location worldwide, with very little regulation. The nature of crypto currency is such that it is difficult to police. Defendants hid their identities to facilitate the conversion of Plaintiffs funds.

The only practical form of protecting Plaintiff's means of recovery of stolen funds is freezing the crypto wallets. If Defendants are allowed notice of this action, they will seize the opportunity to withdraw the funds, leaving no mode of recovery for Plaintiff following a judgement on the merits.

3. Plaintiff's Injury Outweighs Possible Harm to Defendants

Denying Plaintiff's application for injunction relief will harm him more than the granting of such injunction would harm the Defendants. Granting of this Motion freezing the funds until this case is decided on the merits does not prejudice Defendants in any way, where they will have the opportunity to seek removal of the injunction later. However, failing to freeze the accounts will practically prevent Plaintiff from recovery when the case is decided on the merits because the funds will likely be gone by that point. Further, any bond posted by Plaintiff will ensure to protect against any potential harm to the Defendants from the freezing of the accounts. However, if the accounts are not frozen and Defendants withdraw funds from the accounts overseas, Plaintiff will never be compensated for Defendants' wrongdoing. The Supreme Court has held that a preliminary injunction, designed to freeze the status quo and protect the damages remedy is an appropriate form of relief when it is shown that the Defendant is likely to be insolvent at the time of judgement. *Deckert v. independent Shares Corporation*, 311 U.S. 282, 61 S.Ct 229, 85 L.Ed. 189 (1940).

4. Public Interest Weighs Heavily on Plaintiffs Behalf

The protection of the public from financial scams is a matter of public interest. It would be contrary to public policy to allow Defendants the opportunity to withdraw the funds prior to any adjudication on the merits. Defendants will likely continue in the same scheme with others where they could withdraw the funds upon notice of the accounts being the subject of litigation and disappear with the money. Because the Defendants have hid their true identities, a judgement against Defendants will likely never result in any consequence for them, and without access to the funds in the account, recovery on a judgement will be impossible. If Defendants can continue moving the funds freely, this will be contrary to public policy.

III. NOTICE WOULD UNDERMINE RELIEF SOUGHT

A temporary injunction may be issued “without written or oral notice to the adverse party” if: (a) it appears from the specific facts shown by the affidavit or verified pleading that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in oppositions; and (b) The movants attorney certified in writing any efforts that have been made to give notice and the reasons why notices should not be required. Fla. R. Civ. P. 1.610(a). If notice were given to the Defendants before the Court were to rule on this motion to allow the Defendants to be heard in opposition, Defendants would simply take the opportunity to withdraw the funds from subject crypto wallets and continue their scheme on other unsuspecting victims. There would be no incentive for the Defendants to appear at such hearing, and no repercussions for failure to do so, given the nature of the allegations. This would accelerate the very harm this motion seeks to prevent. Defendants will have the opportunity to move to dissolve the injunction at any time pursuant to the rules. However, if no action is taken at this point, the Defendants will likely ignore any hearing or legal action knowing there are no consequences for same, where they will have already absconded with their substantial funds and their identities are unknown.

IV. PLAINTIFF REQUESTS A LOW OR NOMINAL BOND

The trial court is generally afforded discretion in setting the amount of bond for a temporary injunction entered pursuant to Rule 1.610(b), Fla R. Civ. P. See *Net First Nat’l Bank v. Telebank Corp.*, 834 So. 2d 944 (Fla. 4th DCA 2003); *Banyan Lakes Home Owners Assn. v. Sch. Dist. Of Palm Beach County, Florida*, 823 So.2d 247 (Fla. 1st DCA 2002). The purpose bond required as a condition to issuance of a temporary injunction is to provide a sufficient fund to cover the adverse party’s costs and damages if the injunction is wrongfully issued. *Richard v. Behavioral Healthcare Options, Inc.* 647 So.2d 976 (Fla. 2d DCA 1994). Damages include attorney’s fees and court costs.

Town of Davie v. Sloan, 566 So. 2d 938 (Fla. 4th DCA 1990). Since the damages recoverable for a wrongfully issued injunction are ordinarily limited to the bond, *Parker Tampa Two, Inc. c. Somerset Dev. Corp.*, 544 So. 2d 1018 (Fla. 1989), the bond initially set by the court constitutes the court's determination of the foreseeable damages based on the good faith representations that are before it. *Id.* at 1021. While foreseeable damages are considered factors other than the anticipated damages and costs, including the adverse party's chances of overturning the temporary injunction. *See Longshore Lakes joint Ventures v. Mundy*, 616 So.2d 1047 (Fla. 2d DCA 1993). Further, the trial court's initial determination is often necessarily based upon speculative matters and should subsequent events prove the bond amount to be either insufficient or excessive, an affected party is free to move for modification. *See Parker*, 544 So.2d at 1021. *See Montville v. Mobile Med. Indus., Inc.*, 855 So. 2d 212, 215-216 (Fla. 4th DCA 2003).

In this case, Defendants stole over \$600,000 in digital assets from Plaintiff through a calculated impersonation scheme. By posing as Coinbase personnel, fabricating a security breach, and instructing Plaintiff to transfer assets into scam-controlled wallets, Defendants carried out a deliberate and malicious plan to misappropriate Plaintiff's funds. It is unlikely that Defendants will move to modify the requested injunction, as doing so would require them to appear before this Court and risk exposure and accountability for their conduct. Even if they did, the available evidence makes clear that such a motion would not succeed. Plaintiff respectfully requests that the Court impose only a nominal bond.

V. CONCLUSION

Based on the foregoing, Plaintiff has established his need for immediate injunctive relief from this Court that enjoins and prohibits Defendants from accessing and withdrawing the funds from the subject cryptocurrency wallets containing Plaintiff's converted funds. Without this relief, Plaintiff will suffer irreparable harm for which there is no adequate remedy at law that Plaintiff could obtain upon succeeding in this case on the merits. This relief will serve the public interest and should be granted.

WHEREFORE the Plaintiff respectfully requests this Court enter a temporary injunction to freeze the identified crypto wallets and then immediately set this Motion for hearing to determine the necessity of an award of preliminary injunction to prevent further irreparable injury to Plaintiff.

VERIFICATION

Pursuant to Section 92.525, Florida Statutes, and under penalty of perjury, I declare that I have read the foregoing Renewed Emergency *Ex Parte* Motion for Preliminary Injunctive Relief Without Notice, and that the facts stated in it are true and correct to the best of my knowledge and belief.²

/s/ Navin R. Pasem
Navin Pasem
Plaintiff, appearing pro se

Respectfully submitted and filed on April 3, 2025.

/s/ Navin R. Pasem
Navin R. Pasem
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Plaintiff, appearing pro se

² This oath without notary is proper under Fla. Stat. 92.525(1)(C) and (2)

AFFIRMATION OF NAVIN PASEM

I, Navin Pasem, affirm under penalty of perjury as follows:

1. This Affirmation is based on my personal knowledge.
2. On or about February 25, 2025, I received a text message purporting to be from Coinbase Support, warning me of unauthorized activity on my Coinbase account. The message instructed me to call a phone number to prevent unauthorized access.
3. I called the number and spoke with an individual who identified himself as a Coinbase support agent. He claimed that overseas actors were attempting to access my account and then transferred me to another individual who claimed to be a fraud prevention specialist.
4. The second individual instructed me to download the Coinbase Wallet mobile app, asserting that it was a secure extension of my existing Coinbase account. Relying on the information and assurances provided, I followed the instructions given.
5. At the direction of these individuals, I transferred 76.099 Ethereum (“ETH”) and 4.909 Bitcoin (“BTC”), valued at \$607,492.38 at the time, to wallet addresses they provided. Immediately after making the transfers, I could no longer reach any of the individuals involved, and I realized that I had been defrauded.
6. After realizing the theft, I engaged Applied Technology Solutions (ATS) to investigate and trace the stolen assets.

Executed on April 3, 2025.

/s/ Navin R. Pasem
Navin Pasem
Plaintiff, appearing pro se

AFFIRMATION OF KRISTOFER DOUCETTE

I, Kristofer Doucette, affirm under penalty of perjury as follows:

1. I am the President of Applied Technology Solutions (“ATS”), a firm that specializes in financial intelligence, sanctions investigations, and blockchain-based asset tracing. ATS provides forensic analysis and investigative support to law enforcement and private-sector institutions seeking to trace misappropriated digital assets and uncover laundering patterns involving cryptocurrency. As part of my work at ATS, I have investigated matters related to Plaintiff’s above-captioned action and conducted a forensic blockchain analysis to trace Plaintiff’s cryptocurrency assets. The facts set forth herein are based upon my personal knowledge and forensic analysis. If called and sworn as a witness, I could and would competently testify to the matters stated below.

2. Prior to my role at ATS, I led the National Security division at Chainalysis, where I collaborated with federal agencies, foreign governments, and private-sector institutions to investigate the use of cryptocurrency by terrorist organizations, sanctioned entities, and transnational criminal networks. Before that, I spent over fourteen years at the U.S. Department of the Treasury, where I focused on countering terrorist financing, sanctions evasion, and money laundering. I hold a Bachelor of Arts from Middlebury College and a Master of Arts from the Johns Hopkins University School of Advanced International Studies (SAIS). I was also a Fulbright Scholar in Buenos Aires, Argentina. I am a Certified Fraud Examiner and Certified Cryptocurrency Tracing Examiner, and I hold advanced certifications in blockchain investigations, sanctions compliance, and illicit finance, including credentials from Chainalysis.

3. ATS was retained after Plaintiff was deceived into transferring 76.099 Ethereum (“ETH”) and 4.909 Bitcoin (“BTC”) into wallet addresses that were presented as secure and affiliated with Coinbase, but were in fact controlled by the perpetrators. These addresses were used to initiate the laundering of Plaintiff’s cryptocurrency.

4. Using blockchain analytics platforms, manual transaction path reconstruction, bridge and swap tracking, and publicly available blockchain data, I traced the movement of

Plaintiff's stolen assets across wallets, chains, and custodial destinations. Specifically, I traced the movement of Plaintiff's cryptocurrency assets from the initial transfers to their final known destinations at identifiable deposit addresses hosted by centralized exchanges.

5. Plaintiff's ETH was initially transferred to wallet address 0xaC500C1B6f8b197afd48fbc8576712D80c088ab0 (the "0xaC500 wallet"), which is controlled by the perpetrators. Approximately \$80,000 in ETH was sent from that wallet to an intermediary address and then deposited into a custodial wallet hosted by the cryptocurrency exchange TradeOgre. The remaining ETH was transferred to wallet address 0x5aF944437b46A68194D5d0Ad1D48Bcd603a51eFA (the "0x5aF944 wallet"), fragmented into smaller amounts, and routed through a cross-chain blockchain bridge. During this transaction path, the assets were swapped from Wrapped Ether (WETH) back into ETH, further obscuring attribution before continuing on the Ethereum network.

6. The fragmented ETH was ultimately deposited into more than twenty deposit wallets hosted at custodial platforms. These included wallets hosted at known centralized exchanges and additional custodial services that could not yet be conclusively linked to a specific platform. The specific deposit wallet addresses that were conclusively traced to known exchanges are listed in Appendix A, attached to this Affirmation and appended to Plaintiff's Verified Complaint.

7. Plaintiff's BTC was initially sent to two wallet addresses provided by the perpetrators: bc1qr5d2cycuze9x78axjl0v2989g9nn7xmsups23q and bc1qwp7hhd7pc5qr40ymzh2400lgfegy9tr5pvn4xw (the "bc1qwp wallet"). All of the BTC was consolidated into the bc1qwp wallet, which also received proceeds linked to other unrelated schemes, indicating deliberate commingling. Approximately 2.809 BTC (valued at \$243,276) was then deposited into a wallet hosted at TradeOgre. An additional 1.975 BTC (valued at approximately \$171,000) was transferred to an intermediary wallet, fragmented into smaller amounts, and routed into deposit wallets hosted at both known exchanges and additional custodial platforms that have not yet been definitively attributed.

8. The BTC deposit wallets that were conclusively traced to centralized exchanges are also included in Appendix A. These custodial addresses represent the final known destinations of Plaintiff's BTC.

9. The wallet addresses listed in Appendix A were identified based on objective blockchain transaction data and known patterns of custodial infrastructure. Each address is hosted at a centralized exchange and corresponds to a custodial deposit wallet that received Plaintiff's ETH and BTC.

10. The perpetrators used wallet addresses that cannot be linked to real-world individuals through publicly available blockchain data alone. Although their physical identities and locations remain unknown, the wallet addresses that received Plaintiff's stolen assets remain active and capable of receiving inbound transactions. Because blockchain protocols allow for the inclusion of metadata in transaction fields, messages can be embedded and transmitted directly to those wallet addresses.

11. Service of process can be effectuated through the use of nominal-value cryptocurrency transactions sent to the wallet addresses identified in Appendix A. This method embeds a message in the transaction's metadata field containing a hyperlink to a webpage maintained by Plaintiff's counsel, where the Summons, Complaint, Emergency Motion for Preliminary Injunction, Motion for Alternative Service, and all other filings and court orders will be available. This approach enables direct, on-chain communication with the wallets used in the theft. This method is immutable, publicly recorded, and independently verifiable. Anyone with access to the relevant wallet—whether through a centralized exchange interface or direct private key control—will be able to detect the service transaction and view its contents. This approach is technologically sound and reasonably calculated to provide actual notice to the perpetrators through the same wallets they used to receive Plaintiff's stolen assets.

12. In my expert opinion, absent injunctive relief, there is a significant risk that Plaintiff's misappropriated assets, traced to wallet addresses in Appendix A will be withdrawn, transferred, or further laundered, placing them beyond recovery.

I affirm under penalty of perjury under the laws of the State of Florida that the foregoing is true and correct.

Executed this 28 day of March, 2025, in Fort Myers Beach, FL.

A handwritten signature in black ink, appearing to read "Kristofer Doucette", written above a horizontal line.

Kristofer Doucette

Appendix A

Coinbase (3)

0x8495D0D64835bBbcA933501488483f83184AEE04
0x829f8Dc756f7bfe0fa93c4A4A349A248Abf3FBf9
0xD141b2a341B66Ba3FC98a83204bB3c13FA3979D0

OKX (2)

0x946A6903512eD5C758Ff29674CE2D80Ab3acf8D1
0xb96029D98301ebda17189dF57666A06019FC0f42

TradeOgre (4)

0x4648451b5F87FF8F0F7D622bD40574bb97E25980
bc1qnrU0urp778ju4v3datvrhhwh7v772shpkajk89
bc1qmp6kgcmtzl944slcyp5dprx3vjggk20nuk2j43
bc1qhxmay86etyg9nzykgcsm2wjt7ccul4wmnhsyg8

Binance (5)

0x56957739BAe1b7C0725f4e517309eFC8EF6EB73e
0x615790F841d626688Bbc7C397a1dC15785487996
0x08E163449a1951c560c4c93E6638c346633aA56D
0x2c6E2140Fa5FD157fab66263f241DdDb3b92946
15fJm7DahbW5vF71ns8UXdx74ZPCGPXv4N

KuCoin (1)

0x5021aF4f24c5Bd4Cb7c1CCF8eCc198664414A326

HTX (1)

1JaUhZMuXo3Xuvn5p67LNzmLhXnP32FZn

WirexApp (1)

0x8b4A8493fDcD038e04E5fd6AE6A93b3a53c8967a

HitBTC (3)

0x52103366eB89a5f8c833c34B77892Ef90521C167
0x187fE1a8B76c60b85c00A2819152ff00Ff642386
0x32E2EeF43D74601a0eB52eA71c142A6f432F1924

ChangeNow (3)

0xfAaEf33462e2256cfeF3F96C7347Dd7e3C175F09
0xc9148Db23F4217fb320113724946D97bD373eCba
0xdA01f89Bce7E66BCe7a523E0F11A3a9a21Aa68f0

CoinEx (2)

0x7086ac523208cc53619Dc63dC7F47E8fb316D057
0x4C6324ebB5B438cfEc0f878c776574FEeDE4F36

OxaPay (1)

0xC842355888f47C9E4F0eBEF7627A66724Be01295

Stake.com (1)

0x993Cd9D9eb1647eAD826C7F7bC8277E5227c2218

CoinPal (3)

0xAe2b3879ede4732FfD6942be25Ff796B31d67749

0x1472924b0325a37A71E71519ffaF765dc9D27cea

0x429d947cFDD87e4cb1ca3eBDa9075C6B4E801B9a

Uphold (1)

0x06a909c7ED913a8c3b613A4B2a5168Ca579b515c

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12:51:20 UTC

Sent for signature to Kris Doucette (kris@incacoalition.com)
from joey@incacoalition.com
IP: 174.179.118.185



VIEWED

03 / 28 / 2025

12:56:04 UTC

Viewed by Kris Doucette (kris@incacoalition.com)
IP: 71.208.162.13



SIGNED

03 / 28 / 2025

13:03:22 UTC

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IP: 71.208.162.13



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03 / 28 / 2025

13:03:22 UTC

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