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Superior Court of California,
County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By J. Lara, Deputy Clerk

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

10
11 HOWARD MANN, on behalf of himself and
12 all others similarly situated,

13 Plaintiff,

14 v.

15 SEAN MOORE, MIRANDA GOMEZ, and
16 DOES 1 through 200, inclusive,

17 Defendants.

Case No. 24STCV17012

**DECLARATION OF HOWARD MANN IN
SUPPORT OF PLAINTIFF'S EX PARTE
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND OSC RE:
PRELIMINARY INJUNCTION**

Assigned for All Purposes to:
Judge: William F. Highberger
Date: July 16, 2024
Time: 8:30 a.m.
Place: 312 N. Spring Street
Los Angeles, CA 90012, Dept. 10

1 I, Howard Mann, declare under penalty of perjury as follows:

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3 1. My name is Howard Mann. I am over 18 years of age, of sound mind, and am competent
4 to make this Declaration. The evidence set forth in the foregoing Declaration is based upon my
5 personal knowledge unless expressly stated otherwise, and if called and sworn as a witness, I could
6 and would testify to each of the facts set forth herein.

7 2. I am currently 78 years old and reside with my wife at my home in in Encino,
8 California.

9 3. On or about March 17, 2023, I received a call from an individual using the number
10 (803) 962-3077, who claimed to be from the Department of Water and Power. The caller stated my
11 utility bill was overdue and threatened to shut off my water and power if I did not make an immediate
12 payment. This person had detailed information about me, including my account number, address,
13 name, and a plausible amount consistent with previous bills due. Convinced by the caller, I was
14 instructed to resolve the issue using cryptocurrency.

15 4. I was instructed to go to a Bitcoin ATM to deposit cash, purchase Bitcoin, and transfer
16 it as the required payment using a QR code provided to me. Believing that I was sending payment to
17 my legitimate utility service provider, I used a "Coinhub" Bitcoin ATM located at 19558 Ventura
18 Boulevard, Tarzana, California 91356.

19 5. After I deposited cash, and following these steps, I was informed that the payment had
20 not been received and was directed to make additional deposits. This happened several times and led
21 me to repeatedly deposit cash at the Bitcoin ATM.

22 6. The individuals purporting to represent the Department of Water and Power, with
23 whom I communicated throughout this entire scheme, identified themselves as Sean Moore and
24 Miranda Gomez.

25 7. Upon realizing that I had not missed any payments to the Department of Water and
26 Power and that the money I transferred had been stolen, I reached out to Inca Digital, a cryptocurrency
27 investigation firm, to trace my transactions. Before the investigation by Inca Digital and counsel, I
28

1 was not aware of transactions undertaken to hide and steal my cryptocurrency assets. I would be
2 severely harmed if I am unable to recover those assets.

3 8. As a result of this scam, I suffered a substantial financial loss. In total, I lost \$10,070
4 that I sent in cryptocurrency at their instruction to the scam artists who told me that they were from
5 the Department of Water and Power.

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7 Executed this 15th day of July, 2024, in Encino, California.

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10 Howard Mann
11 Howard Mann
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