

1 Dimitri Nichols, Esq. (SBN 242098)  
2 **THE GORI LAW FIRM, P.C.**  
3 3848 W. Carson Street, Suite 350  
4 Torrance, CA 90503  
5 Telephone: (424) 383-1501  
6 Facsimile: (424) 383-1504  
7 E-mail: [californiaservice@gorilaw.com](mailto:californiaservice@gorilaw.com)

8 Samuel D. Elswick, Esq. (FL SBN 0105108)  
9 (Pro Hac Vice Application Pending)  
10 **THE GORI LAW FIRM, P.C.**  
11 37 N. Orange Ave., Ste. 226  
12 Orlando, FL 32801  
13 Phone (321) 430-0864 | Fax (321) 234-0336  
14 Email: [selswick@gorilaw.com](mailto:selswick@gorilaw.com)

15 Attorneys for: PLAINTIFF

**FILED**  
YOLO SUPERIOR COURT  
**MAY 20 2026**  
BY B. PUEBLA  
DEPUTY

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF YOLO**

<p>BRIAN M. SAMUELS, on behalf of himself and others similarly situated,</p> <p style="text-align: center;">PLAINTIFF,</p> <p style="text-align: center;">v.</p> <p>JOHN DOE NOS. 1-25,</p> <p style="text-align: center;">Defendants.</p>	<p>YOLO CASE NO. CV2026-1200</p> <p><b>DECLARATION OF BRIAN SAMUELS IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION FOR TEMORARY RESTRAININNG ORDER AND OSC RE: PRELIMINARY INJUNCTION</b></p> <p>Date: May 21, 2026 Time: 9:00 a.m. Dept.:14</p>
--	--

I, Brian Samuels, declare under penalty of perjury as follows:

1. My name is Brian Samuels. I am over 18 years of age, of sound mind, and am competent to make this Declaration. The statements set forth in this Declaration are based upon my personal knowledge unless otherwise stated, and if called as a witness I could and would competently testify to the matters stated herein.

2. I live and reside in El Macero, California. I am retired and a senior citizen, and that was my location during each of the events set forth herein.

FILED BY FAX

1           3.       This action arises from a coordinated cryptocurrency investment fraud scheme  
2 through which Defendants induced me to transfer cryptocurrency valued at approximately  
3 \$4,868,861.23 to blockchain wallet addresses controlled by Defendants.

4           4.       I lawfully owned digital assets maintained in custodial cryptocurrency accounts at  
5 Coinbase, Inc.

6           5.       The cryptocurrency transferred from those accounts constituted identifiable digital  
7 property recorded on public blockchain ledgers and was at all times subject to my exclusive  
8 ownership and right to immediate possession.

9           6.       In or about November 2024, I was contacted by an individual falsely purporting to  
10 be a former colleague identified as “Dan Vivoli.” This individual represented that he was an  
11 experienced cryptocurrency investor and invited me to participate in what was described as a  
12 “foolproof” cryptocurrency investment opportunity capable of generating substantial profits.

13           7.       Through subsequent communications, Defendants directed me to invest my  
14 cryptocurrency through a website operating under the domain Okdaxuda.com, which Defendants  
15 represented to be a legitimate cryptocurrency trading platform.

16           8.       Defendants represented that my deposits would be used in automated  
17 cryptocurrency trading strategies designed to generate profits.

18           9.       I now realize that Okdaxuda.com was a fraudulent website designed to  
19 misappropriate my cryptocurrency deposits.

20           10.      The platform appeared highly legitimate and displayed account balances and  
21 purported trading profits. These representations induced me to transfer cryptocurrency to the  
22 platform and to continue transferring increasingly larger amounts. I now believe that the platform,  
23 the displayed balances, and the purported trading profits were entirely fraudulent. I later learned  
24 that the balances, trading activity, and transaction confirmations displayed on the Okdaxuda.com  
25 platform were controlled entirely by the operators of the website and did not reflect actual  
26 cryptocurrency trading or blockchain transactions.

27           11.      Relying on Defendants’ representations, I transferred U.S. dollars from my  
28 brokerage account at Charles Schwab to a Coinbase cryptocurrency account that Defendants

1 instructed me to establish. I converted the U.S. fiat currency into USDC cryptocurrency and  
2 transferred those digital assets to wallet addresses associated with the Okdaxuda.com platform.

3 12. Over the course of several months, Defendants induced me to transfer increasingly  
4 larger amounts of cryptocurrency. In total, I transferred approximately \$4,868,861.23 in  
5 cryptocurrency through multiple transactions to wallet addresses designated by Defendants. I  
6 made these transfers in reliance on Defendants' representations that the platform was legitimate  
7 and that my deposits were being used for cryptocurrency trading.

8 13. The Okdaxuda.com interface displayed account balances and purported trading  
9 gains which appeared to show profitable trading activity and reinforced my belief that the platform  
10 was legitimate. A true and correct screenshot of the account balance displayed on the  
11 Okdaxuda.com platform is attached as Exhibit A to this Declaration.

12 14. In February 2025, I attempted to withdraw my principal and purported trading  
13 profits from the Okdaxuda.com platform. The withdrawal request was immediately denied.

14 15. Instead, representatives of the platform falsely informed me that I was required to  
15 pay approximately \$811,490 USDT in taxes to international tax authorities before my withdrawal  
16 could be processed. A true and correct screenshot of this communication is attached as Exhibit B  
17 to this Declaration.

18 16. Believing that this payment was necessary to withdraw my funds, I transferred  
19 cryptocurrency from my Coinbase account in two transactions totaling approximately \$606,743.00  
20 to the wallet address designated by Defendants to satisfy the purported tax obligation. A true and  
21 correct screenshot confirming the platform's receipt of these payments is attached as Exhibit C to  
22 this Declaration.

23 17. Upon information and belief, Defendants presented a purported transaction  
24 confirmation referencing a blockchain transaction hash to falsely suggest that I had transferred  
25 funds from an unauthorized or suspicious source, thereby misleading and confusing me regarding  
26 the origin of the transaction and creating a pretext for Defendants to freeze my account and  
27 demand additional payments. A true and correct screenshot of the transaction confirmation  
28 displayed on the Okdaxuda.com platform is attached as Exhibit D to this Declaration.

1           18.     After I made these payments, I again attempted to withdraw my principal and  
2 alleged profits. Representatives of Okdaxuda.com again refused the withdrawal and informed me  
3 that my account had been frozen pending review by the platform’s “risk control department.”  
4 Defendants demanded that I pay an additional \$800,000 “risk deposit” in order to release my  
5 funds. At this point, Okdaxuda.com’s representatives further threatened to permanently freeze my  
6 account and prosecute me for suspected money laundering and other “legal liability” if I did not  
7 pay the alleged risk deposit. A true and correct screenshot of this communication is attached as  
8 Exhibit E to this Declaration.

9           19.     Relying on Okdaxuda.com’s representation that a risk margin payment was  
10 required to release my funds, and halt prosecution on the alleged money laundering charges, I  
11 transferred \$150,000 USDC to Okdaxuda.com, valued at about \$150,000 U.S. dollars. I also  
12 requested a 30-day extension to pay the remaining balance of \$700,000 that Okdaxuda.com  
13 alleged he owed. A true and correct screenshot of this demand is attached as Exhibit F to this  
14 Declaration.

15           20.     After I complied with the risk margin demand and made my initial payment of  
16 \$150,000, I received another threatening message from Okdaxuda.com that I had until March 30,  
17 2025, to pay the balance of the alleged \$700,000 large withdrawal risk deposit or my account  
18 would be permanently frozen and I would be prosecuted. Okdaxuda.com additionally threatened  
19 me that if the \$700,000 alleged risk margin was not paid by the due date, my account would be  
20 fined an additional \$5,000 per day. A true and correct screenshot of this communication is  
21 attached as Exhibit G to this Declaration.

22           21.     On March 18, 2025, I complied with Okdaxuda’s demand and paid them an  
23 additional \$800,000 USDC valued at \$799,000 U.S. dollars. A true and correct screenshot of this  
24 communication is attached as Exhibit H to this Declaration.

25           22.     After I paid them the \$800,000 “risk margin” Okdaxuda.com alleged was due, they  
26 again froze my account alleging that my withdrawal application had been rejected by the  
27 “blockchain node” due to the large amount of my withdrawal and that in order to “protect the safety”  
28 of my funds, it would be frozen until I paid an additional \$850,000 as “risk money” to verify the

1 account security for large withdrawals. A true and correct screenshot of this communication is  
2 attached as Exhibit I to this Declaration.

3 23. After Okdaxuda.com imposed this additional payment demand, I informed the  
4 Okdaxuda.com representatives that I was unable and unwilling to transfer further funds. By that  
5 time, I had exhausted all of my available resources, and I remained unable to withdraw the assets  
6 displayed in my Okdaxuda.com.

7 24. Upon realizing that the platform was fraudulent, I acted diligently and immediately  
8 undertook efforts to recover my misappropriated property. I filed a complaint with the Federal  
9 Bureau of Investigation's Internet Crime Complaint Center (IC3) and contacted the United States  
10 Secret Service. I also retained two cryptocurrency tracing firms, ZeroShadow and Outrider  
11 Analytics, to investigate the transactions. Despite months of effort, I was advised that recovery  
12 through those channels was not possible.

13 25. I thereafter retained Inca Digital ("Inca"), a cryptocurrency investigation firm,  
14 which conducted a forensic blockchain analysis of my transactions. Inca advised me that  
15 Defendants operated a common scheme through the online platform described above known as  
16 "pig butchering," and Inca traced my stolen cryptocurrency to specific wallet addresses associated  
17 with that scheme. On information and belief, and based upon Inca's investigation, numerous  
18 similarly situated victims transferred cryptocurrency to the same or related wallet addresses as part  
19 of the same standardized operation.

20 26. At all relevant times, I retained the lawful right to immediate possession of the  
21 transferred cryptocurrency. The assets are specifically identifiable on public blockchain ledgers  
22 and traceable to recipient wallet addresses that are controlled, directly or indirectly, by  
23 Defendants. The blockchain ledger publicly records the transfer path of these assets and allows the  
24 stolen cryptocurrency to be traced to specific wallet addresses associated with Defendants.

25 27. Defendants exercised and continue to exercise unauthorized dominion and control  
26 over my digital assets and converted those assets to their own use.

27 28. Unless the cryptocurrency transferred to Defendants is promptly frozen and  
28 preserved, I will suffer irreparable harm because cryptocurrency can be transferred instantly across

across blockchain networks and rapidly dissipated beyond the reach of law enforcement or the courts.

29. Cryptocurrency can be transferred across blockchain networks within seconds and moved through multiple intermediary wallet addresses, exchanges, or cross-chain bridges in ways that can quickly obscure the trail of stolen assets. I have been informed by investigators who reviewed my transactions that, if the cryptocurrency associated with this fraud is not promptly frozen, Defendants could rapidly dissipate the assets beyond the reach of victims, law enforcement, or the Court.

30. Because the stolen cryptocurrency remains traceable to identifiable wallet addresses, prompt action by the Court directing cryptocurrency exchanges or other custodians to freeze assets associated with those wallets is necessary to preserve the possibility of recovery. Without immediate injunctive relief, the assets may be permanently transferred or concealed, and recovery may become impossible. Cryptocurrency can be transferred across international exchanges within seconds, and without a prompt freeze order the assets may quickly be moved beyond the jurisdiction of this Court.

31. I lost my entire life savings as a result of this scam and almost lost my home. The financial harm caused by Defendants' conduct has been devastating and has severely impacted my financial stability.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 26 day of March 2026.

  
\_\_\_\_\_  
Brian M. Samuels

# EXHIBIT A

Total assets account (USDT)

**8,722,849.58977673**

≈ \$ 8,722,849.58977673

Daily PNL: 0.00 (USDT) 

Dollar 

Credit Score



Withdraw



Deposit



Exchange



Transfer

Exchange

USDT

In Order 8,572,774.58977673

ETH

In Order 0.00

BTC

In Order 0.00

USDC

In Order 150,000.00

DAI

In Order 0.00

Trade

Perpetual

Finance

Available 0.00

Total 8,572,774.5898

Available 0.00

Total 0.00

Available 0.00

Total 0.00

Available 0.00

Total 150,000.00

Available 0.00

Total 0.00



Home



Markets



Trade

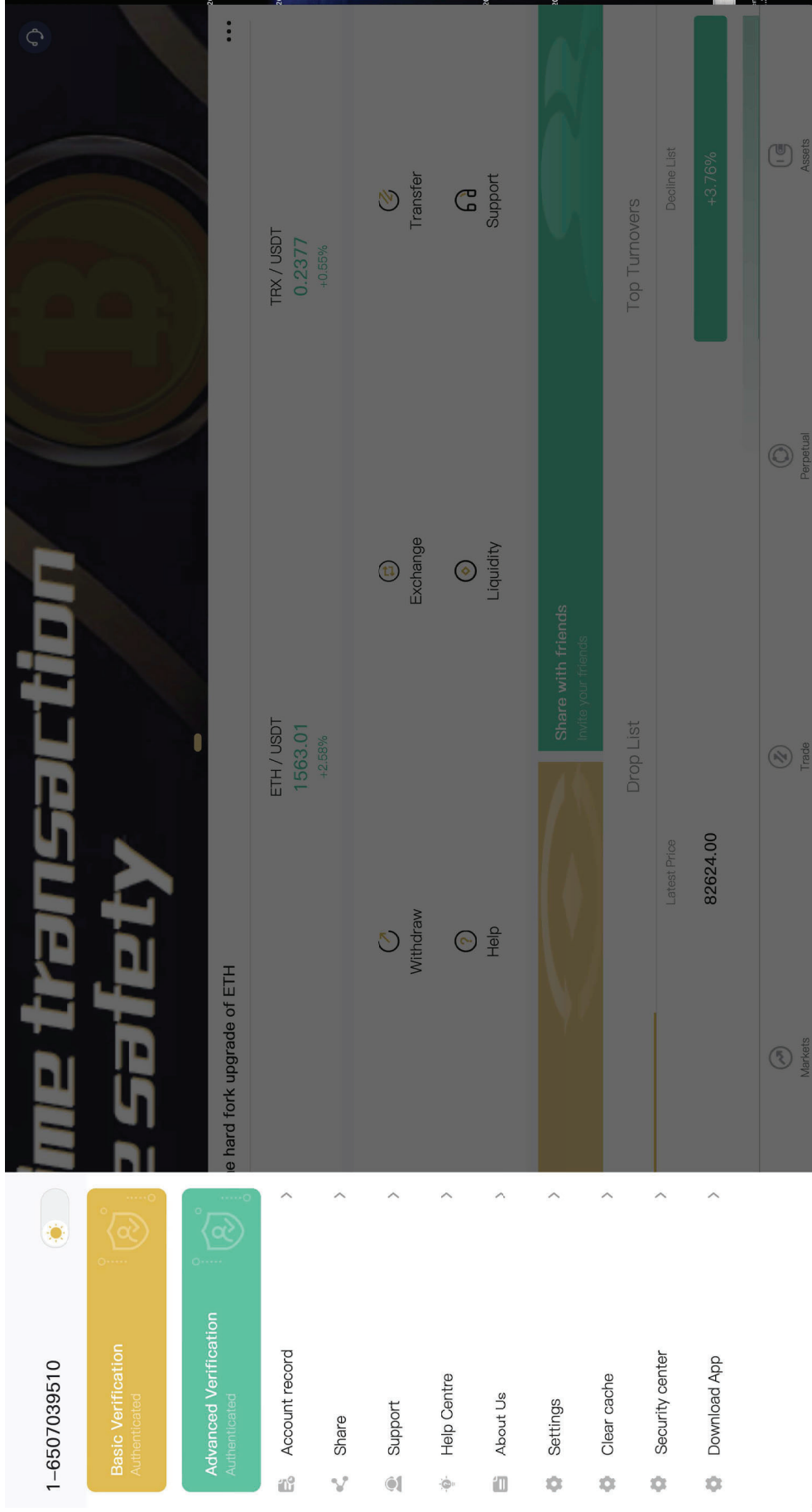


Perpetual



Assets

Okdaxuda.com purported (Total Assets USDT)



Okdaxda.com purported Client Account Dashboard

# EXHIBIT B

Dear Customer: Your total tax bill is \$811,490. But you have already paid \$260,000 in taxes. So you currently still need to make up \$551,490 in taxes

# EXHIBIT C

Dear Customer: Your total tax bill is \$811,490. But you have already paid \$260,000 in taxes. So you currently still need to make up \$551,490 in taxes

Dear user: We have received your tax payment of USD 345,000. You currently still have to pay \$206,049 in taxes

# EXHIBIT D

23:11:16

TELEGRAM

58

Back

1574 of 1574  
Transaction details



Successful

March 11, 2025 23:14PM

Details Send

-206490 USDT



Ethereum

Miner Fee -0.0009244 ETH

From 0x600e5fAc81B3754688271ae26E9EDD  
d407c761C2

To 0x2C653cFf62453db9dedf9cBf4dF26  
8d574A9295e

Target 0x2C653cFf62453db9dedf9cBf4dF26  
8d574A9295e

TxID 0x10adaa99abb921f4ccc8370beee5948  
9e930fd80cc52ebc563f9b6f62e6ccf24

See details



👉👉 Tina  
today at 11:15 PM

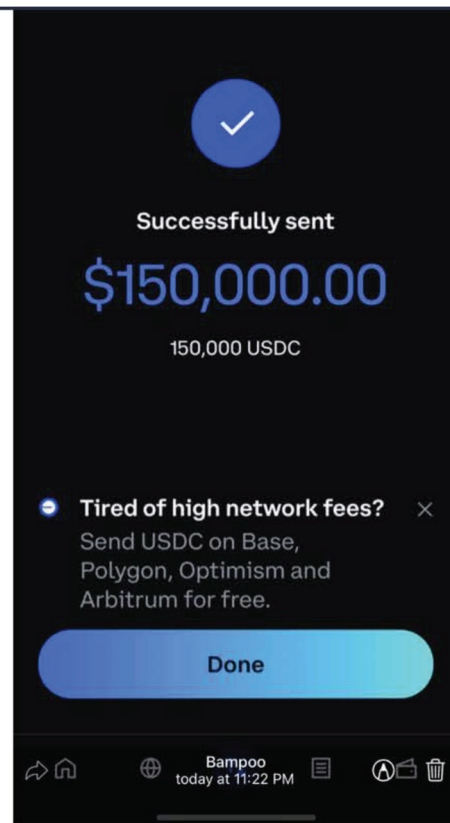


# EXHIBIT E

Dear user, the system has found that when you paid taxes, a sum of \$206,490 was transferred from an external cryptocurrency address of another account. This \$206,490 tax touched the risk control department's suspected money laundering behavior. Your account has now been frozen. You need to pay \$800,000 as a risk deposit within 10 days before it can be unfrozen. At that time, the verification deposit will be returned to your original account. If you fail to pay the deposit within the specified time, your account will be permanently frozen, and we will prosecute you for suspected money laundering. When we prosecute you, you will face legal liability.

# EXHIBIT F

I only have \$150,000 that I can pay towards the \$850,000 verification deposit that you told me I owe. I will deposit that later today (California time). How long after I make the \$150,000 deposit will you be able to tell me the length of my extension? I desperately need at least 30 days extension. Thank you.



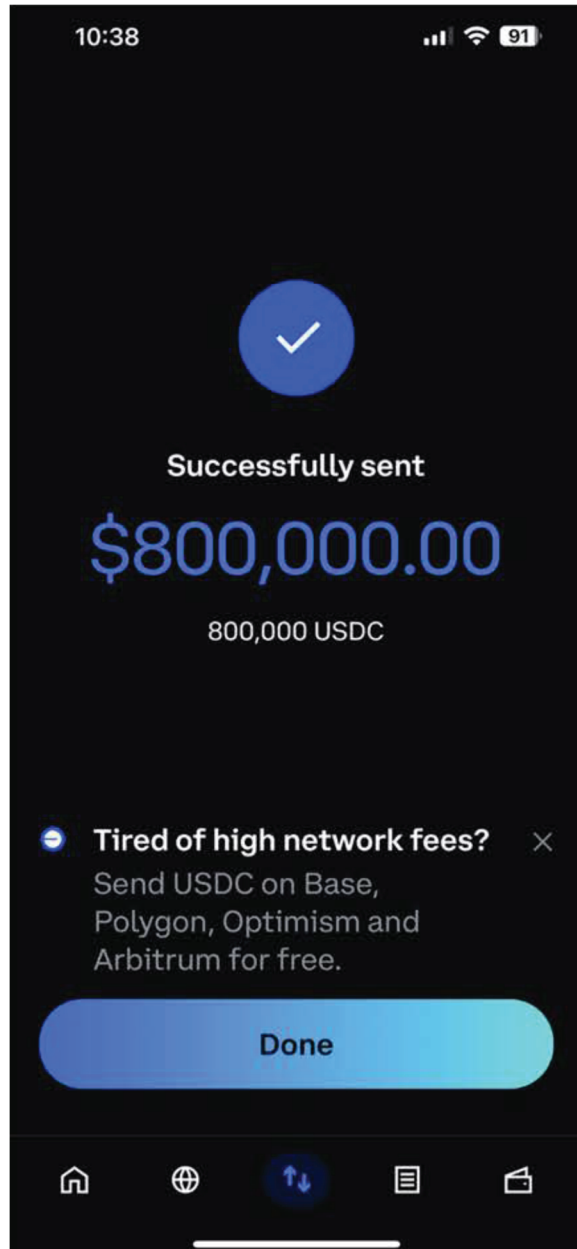
# EXHIBIT G

Dear user: Your extended service has been extended to March 30. You need to pay the remaining \$700,000 large withdrawal risk deposit before March 30. If you fail to pay the remaining \$700,000 large withdrawal risk deposit within the specified time, you will be prosecuted and your option trading account will be permanently frozen, and you will be required to bear the corresponding legal responsibilities.

Dear user: Today is your last day of extended payment. If you fail to pay the remaining margin before 00:00, your account will be fined \$5,000 per day. We will also file a lawsuit against you through legal procedures.

# EXHIBIT H

Successfully deposited the requested \$800,000



# EXHIBIT I

Dear user: Your account is at risk of triggering an alert due to large withdrawals. Your account has not experienced any large withdrawals before. Therefore, in order to verify the security of your account and funds, you need to pay a deposit of \$850,000 to verify the security of your large withdrawal account. After you pay the \$850,000 deposit, your account will return to normal, and the \$850,000 deposit will also be returned to your options trading account. Please pay the deposit within the specified time.