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By: A Sullivan, Deputy

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
8 Samuel D. Elswick, Esq. (FL SBN 0105108)
9 (*Pro Hac Vice Granted*)
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
15 Attorneys for: PLAINTIFF

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ASullivan

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

BRIAN M. SAMUELS, on behalf of himself and others similarly situated, PLAINTIFF, v. JOHN DOE NOS. 1-25, Defendants.	YOLO CASE NO. CV2026-1200 <i>[Assigned to the Honorable Samuel McAdam]</i> PROPOSED PRELIMINARY INJUNCTION ORDER
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The matter came on regularly for hearing, before Judge Daniel P. Maguire in Dept. 8, on June 25, 2026, pursuant to the Court’s May 26, 2026 Order to Show Cause regarding Plaintiff’s request for a Preliminary Injunction. Following consideration of the evidence, the arguments of counsel, and the absence of any opposition, the Court granted Plaintiff’s request for a Preliminary Injunction and directed Plaintiff to submit this proposed order memorializing its ruling.

1 On May 26, 2026, the Court granted Plaintiff's request for a Temporary Restraining Order
2 ("TRO"), issued an Order to Show Cause regarding the issuance of a Preliminary Injunction, and
3 scheduled a hearing for June 25, 2026.

4 Notice of the hearing, together with the Temporary Restraining Order and Order to Show
5 Cause, was provided in accordance with the Court's prior orders. Defendants, the identified
6 cryptocurrency exchanges, and all persons and entities subject to the Temporary Restraining Order
7 were afforded notice of these proceedings and an opportunity to be heard. No opposition to the
8 issuance of a Preliminary Injunction was filed, and no Defendant or restrained party appeared at
9 the June 25, 2026 hearing.

10 The Court has reviewed and considered the Verified Complaint, Plaintiff's Ex Parte
11 Application for Temporary Restraining Order and Order to Show Cause, Plaintiff's Memorandum
12 of Points and Authorities, the Declaration of Plaintiff Brian Samuels, the Declaration of Maya
13 Vick, the Declaration of Dimitri Nichols, all exhibits submitted in support thereof, the arguments
14 of counsel presented at the hearing, and the entire record in this action.

15 At the June 25, 2026 hearing, the Court ordered Plaintiff to deposit a cash undertaking in
16 the amount of One Thousand Dollars (\$1,000.00), pursuant to Code of Civil Procedure sections
17 529 and 995.710, as security for the Preliminary Injunction.

18 Having considered the evidence and arguments presented, and good cause appearing, the
19 Court makes the following findings:

20
21 **FINDINGS**

22 1. Plaintiff has presented competent evidence establishing a reasonable probability of
23 prevailing on the merits of his claims arising from an alleged cryptocurrency investment fraud
24 scheme through which Defendants induced Plaintiff to transfer approximately \$4.9 million in
25 cryptocurrency to blockchain wallet addresses controlled by Defendants.

26 2. The evidence presently before the Court demonstrates that the cryptocurrency
27 transferred by Plaintiff constitutes specific and identifiable digital property capable of being traced
28 through publicly available blockchain records.

1 3. The Court further finds that forensic blockchain tracing has identified specific
2 blockchain wallet addresses and exchange-hosted deposit wallets that presently contain, or
3 previously contained, traceable proceeds of the alleged fraud. The evidence further demonstrates
4 that the identified centralized cryptocurrency exchanges possess the technical ability to restrict
5 transfers from, preserve, and maintain the assets associated with those wallet addresses pending
6 further order of this Court.

7 4. The Court further finds that the restrained wallet addresses identified in Appendix
8 A constitute the last known blockchain locations to which Plaintiff's misappropriated
9 cryptocurrency has been traced based upon the forensic blockchain evidence presently before the
10 Court.

11 5. The Court finds that absent preliminary injunctive relief, Defendants are likely to
12 transfer, conceal, dissipate, or otherwise place the identified cryptocurrency beyond the
13 jurisdiction of this Court. Because cryptocurrency may be transferred instantaneously through
14 blockchain networks and across jurisdictions, monetary damages alone would not constitute an
15 adequate remedy if the identified assets are permitted to be dissipated before final judgment.

16 6. The Court further finds that the balance of hardships weighs decisively in Plaintiff's
17 favor. The requested injunction merely preserves the status quo by temporarily restricting the
18 transfer of traceable digital assets pending adjudication of the parties' respective rights. By
19 contrast, denial of injunctive relief would create a substantial risk that the assets would be
20 irretrievably transferred beyond the reach of the Court.

21 7. The Court further finds that issuance of a Preliminary Injunction serves the public
22 interest by preserving traceable property allegedly obtained through fraud, protecting the integrity
23 of judicial proceedings, and maintaining the Court's ability to afford meaningful relief should
24 Plaintiff ultimately prevail.

25 8. The Court further finds that the requested relief is narrowly tailored. The
26 Preliminary Injunction does not authorize the seizure or transfer of cryptocurrency to Plaintiff.
27 Rather, it preserves identified assets and associated records pending final determination of the
28 merits of this action.

1 **IT IS HEREBY ORDERED:**

2 **1. Preliminary Injunction Granted.**

3 Plaintiff's application for a Preliminary Injunction is **GRANTED** pursuant to California
4 Code of Civil Procedure sections 527 and 529.

5 **2. Persons Bound by this Order.**

6 This Preliminary Injunction is binding upon Defendants JOHN DOE Nos. 1–25, their
7 officers, agents, servants, employees, attorneys, representatives, successors, assigns, and all
8 persons acting in concert or participation with them who receive actual notice of this Order,
9 including, without limitation, any centralized cryptocurrency exchange, digital asset custodian, or
10 other entity maintaining custody or control of cryptocurrency, digital assets, or customer accounts,
11 exchange-hosted accounts, sub-accounts, custodial wallets, internal wallets, deposit addresses,
12 withdrawal addresses, and other accounts or repositories associated with, linked to, controlled by,
13 credited to, or reasonably identifiable as belonging to the same account holder or beneficial owner
14 as the wallet addresses identified in Appendix A.

15 **3. Freeze of Identified Cryptocurrency Assets.**

16 Pending further order of this Court, Defendants and all persons or entities subject to this
17 Order are hereby ENJOINED from transferring, withdrawing, selling, liquidating, encumbering,
18 pledging, exchanging, converting, dissipating, concealing, or otherwise disposing of any
19 cryptocurrency, digital assets, funds, or other property maintained in any cryptocurrency or digital
20 assets located in or traceable to the wallet addresses identified in Appendix A, together with any
21 customer accounts, exchange-hosted accounts, sub-accounts, custodial wallets, internal wallets,
22 deposit addresses, withdrawal addresses, and other accounts or repositories associated with, linked
23 to, controlled by, maintained for, credited to, or reasonably identifiable as belonging to the same
24 account holder or beneficial owner, including all assets associated with the wallet addresses
25 identified in Appendix A.

26 This restraint applies only to cryptocurrency and digital assets that have been identified
27 through forensic blockchain tracing as traceable to the transactions that are the subject of this
28 action and is intended solely to preserve the status quo pending final adjudication of Plaintiff's

1 claims. Nothing contained herein authorizes the transfer of any cryptocurrency or digital assets to
2 Plaintiff absent further order of this Court.

3 **4. Exchange Compliance.**

4 Upon receiving actual notice of this Order, the following non-party cryptocurrency
5 exchanges: **Binance, Gate.io, Kraken, KuCoin, and OKX**, together with their respective
6 parents, subsidiaries, affiliates, agents, successors, assigns, and persons acting in concert or
7 participation with them, and any other cryptocurrency exchange, digital asset custodian, financial
8 institution, or intermediary receiving actual notice of this Order, shall promptly identify the
9 customer account or accounts associated with the wallet addresses identified in Appendix A and
10 shall immediately freeze, restrain, and preserve any cryptocurrency, digital assets, funds, or other
11 property located in or traceable to the wallet addresses identified in Appendix A, including,
12 without limitation, any customer account, exchange-hosted account, sub-account, custodial wallet,
13 internal wallet, deposit address, withdrawal address, or other account or repository associated
14 with, linked to, controlled by, maintained for, credited to, or reasonably identifiable as belonging
15 to the same account holder or beneficial owner as the wallet addresses identified in Appendix A,
16 whether currently maintained or hereafter identified, together with any assets directly or indirectly
17 traceable to Plaintiff's transfers.

18 This Order requires the restraint and preservation of the entire customer account or
19 accounts, together with any associated exchange-hosted accounts, sub-accounts, custodial wallets,
20 internal wallets, deposit addresses, withdrawal addresses, and other repositories associated with,
21 linked to, controlled by, maintained for, credited to, or reasonably identifiable as belonging to the
22 same account holder or beneficial owner, and is not limited solely to the blockchain wallet
23 addresses identified in Appendix A.

24 **5. Preservation of Records.**

25 The following non-party cryptocurrency exchanges: **Binance, Gate.io, Kraken, KuCoin,**
26 **and OKX**, together with their respective parents, subsidiaries, affiliates, agents, successors,
27 assigns, and persons acting in concert or participation with them, shall preserve and shall not
28 destroy, alter, delete, overwrite, or permit the destruction or alteration of any documents,

electronically stored information, communications, blockchain records, or other data relating to the wallet addresses identified in Appendix A, the customer accounts associated therewith, or any customer account, exchange-hosted account, sub-account, custodial wallet, internal wallet, deposit address, withdrawal address, or other account or repository associated with, linked to, controlled by, maintained for, credited to, or reasonably identifiable as belonging to the same account holder or beneficial owner as the wallet addresses identified in Appendix A.

Such records shall include, without limitation: (i) know-your-customer (KYC) records; (ii) account holder identification information; (iii) account registration records; (iv) associated or linked accounts and wallet addresses; (v) account asset balances and asset types; (vi) blockchain deposit and withdrawal records; (vii) transaction histories; (viii) account access information, including IP logs, login history, device identifiers, browser fingerprints, and authentication records; (ix) associated email addresses, telephone numbers, and other contact information; (x) communications concerning the accounts or transactions; and (xi) any other records reasonably necessary to identify the persons controlling such accounts or to trace cryptocurrency or other digital assets directly or indirectly traceable to Plaintiff's transfers. This preservation obligation shall remain in effect until further order of the Court.

6. Notice to Account Holders.

The following non-party cryptocurrency exchanges: **Binance, Gate.io, Kraken, KuCoin, and OKX**, together with their respective parents, subsidiaries, affiliates, agents, successors, assigns, and persons acting in concert or participation with them who receive actual notice of this Order, shall, **within forty-eight (48) hours** of receiving actual notice of this Order, provide notice of this Preliminary Injunction to any account holder associated with the wallet addresses identified in Appendix A, including any customer account, exchange-hosted account, sub-account, custodial wallet, internal wallet, deposit address, withdrawal address, or other account or repository associated with, linked to, controlled by, maintained for, credited to, or reasonably identifiable as belonging to the same account holder or beneficial owner as the wallet addresses identified in Appendix A. Such notice shall include a copy of this Order and shall be transmitted through the exchange's customary means of communicating with its account holders. The exchanges shall

1 promptly provide Plaintiff's counsel with written confirmation that such notice has been
2 transmitted..

3 **7. Alternative Service.**

4 Plaintiff is authorized to serve a copy of this Preliminary Injunction and any other papers
5 authorized by the Court upon the person or persons controlling the wallet addresses identified in
6 Appendix A, together with any customer accounts, exchange-hosted accounts, sub-accounts,
7 custodial wallets, internal wallets, deposit addresses, withdrawal addresses, or other accounts or
8 repositories associated with, linked to, controlled by, maintained for, credited to, or reasonably
9 identifiable as belonging to the same account holder or beneficial owner as the wallet addresses
10 identified in Appendix A, by means of a blockchain-based electronic notice, including but not
11 limited to a special-purpose blockchain token, blockchain message, inscription, memo, or other
12 blockchain-native communication mechanism reasonably calculated to provide notice (the
13 "Service Notice"), transmitted to the wallet addresses identified in Appendix A, and, where
14 available, through any known email addresses, electronic messaging platforms, or other electronic
15 contact information associated with such persons.

16 The Service Notice shall contain a hyperlink (the "Service Hyperlink") to a website
17 maintained by Plaintiff's counsel where this Preliminary Injunction and any other papers
18 authorized by the Court shall be published. The Service Hyperlink may include a mechanism to
19 record whether the hyperlink has been accessed.

20 The Court finds that the foregoing methods of service are reasonably calculated, under all
21 the circumstances, to apprise Defendants of the pendency of these proceedings and to satisfy the
22 requirements of due process. Such service shall constitute good and sufficient service for all
23 purposes authorized by this Order and applicable law.

24 **8. Expedited Discovery.**

25 The following non-party cryptocurrency exchanges—**Binance, Gate.io, Kraken, KuCoin,**
26 **and OKX**—together with their respective parents, subsidiaries, affiliates, agents, successors,
27 assigns, and persons acting in concert or participation with them, shall, within the time prescribed
28 by this Court or upon service of appropriate discovery authorized by this Order, produce records

1 sufficient to identify the account holders associated with the wallet addresses identified in
2 Appendix A and to trace the movement of cryptocurrency or other digital assets traceable to
3 Plaintiff's transfers, including, without limitation:

- 4 (i) know-your-customer ("KYC") records;
- 5 (ii) account holder identification information;
- 6 (iii) all customer accounts, exchange-hosted accounts, sub-accounts, custodial wallets,
7 internal wallets, deposit addresses, withdrawal addresses, and other accounts or
8 repositories associated with, linked to, controlled by, maintained for, credited to, or under
9 common ownership or control with the wallet addresses identified in Appendix A;
- 10 (iv) account asset balances and asset types;
- 11 (v) complete transaction histories;
- 12 (vi) blockchain deposit and withdrawal records;
- 13 (vii) account access information, including IP logs, login history, device identifiers,
14 browser fingerprints, authentication records, and associated metadata;
- 15 (viii) associated email addresses, telephone numbers, payment methods, and other contact
16 information;
- 17 (ix) communications relating to the accounts or transactions at issue; and
- 18 (x) any other records reasonably necessary to identify the persons controlling such
19 accounts or to locate, trace, preserve, or recover cryptocurrency or other digital assets
20 directly or indirectly traceable to Plaintiff's transfers.

21 **9. Continuing Duty to Preserve Assets and Evidence.**

22 Defendants, and all persons or entities subject to this Order, including but not limited to
23 Binance, Gate.io, Kraken, KuCoin, and OKX, together with their respective parents, subsidiaries,
24 affiliates, agents, successors, assigns, and persons acting in concert or participation with them,
25 shall preserve all cryptocurrency, digital assets, wallet records, blockchain transaction records,
26 account information, electronically stored information, documents, communications, and other
27 evidence relating to the transactions at issue in this action, including, without limitation, any
28 customer accounts, exchange-hosted accounts, sub-accounts, custodial wallets, internal wallets,

1 deposit addresses, withdrawal addresses, and other accounts or repositories associated with, linked
2 to, controlled by, maintained for, credited to, or reasonably identifiable as belonging to the same
3 account holder or beneficial owner as the wallet addresses identified in Appendix A.

4 This preservation obligation includes, without limitation, know-your-customer (KYC)
5 records, account registration records, account asset balances and asset types, transaction histories,
6 blockchain deposit and withdrawal records, IP logs, login history, device identifiers, associated
7 email addresses, telephone numbers, communications, and all other electronically stored
8 information relating to the transactions or assets at issue, and shall remain in effect pending further
9 order of the Court.

10 **10. Cash Undertaking.**

11 Pursuant to California Code of Civil Procedure sections 529, 995.240, and 995.710, and
12 consistent with the Court's ruling at the June 25, 2026 hearing, Plaintiff shall deposit with the
13 Clerk of the Court a cash undertaking in the amount of **One Thousand Dollars (\$1,000.00)** as
14 security for this Preliminary Injunction. Upon Plaintiff's posting of the undertaking, this
15 Preliminary Injunction shall remain in full force and effect unless modified or dissolved by further
16 order of the Court.

17 **11. Continuing Jurisdiction.**

18 The Court retains jurisdiction over this action for purposes of enforcing, interpreting,
19 modifying, dissolving, or otherwise administering this Preliminary Injunction and granting such
20 further relief as justice may require.

21 **12. Modification of Appendix A.**

22 Upon noticed motion, stipulation of the parties, or further order of the Court, Appendix A
23 may be amended to add or remove wallet addresses, customer accounts, exchange-hosted
24 accounts, sub-accounts, custodial wallets, internal wallets, deposit addresses, withdrawal
25 addresses, or other accounts or repositories associated with, linked to, controlled by, maintained
26 for, credited to, or reasonably identifiable as belonging to the same account holder or beneficial
27 owner, and to add or remove centralized cryptocurrency exchanges, digital asset custodians,
28 financial institutions, or other intermediaries shown by competent evidence to hold or control

1 cryptocurrency, digital assets, or other property directly or indirectly traceable to the transactions
2 that are the subject of this action.

3 **13. Duration of Preliminary Injunction.**

4 This Preliminary Injunction shall remain in full force and effect until the entry of a final
5 judgment in this action, or until modified, dissolved, or superseded by further order of this Court
6 or any court of competent appellate jurisdiction.

7 **14. Service of Order.**

8 Plaintiff shall promptly serve this Preliminary Injunction upon Binance, Gate.io, Kraken,
9 KuCoin, OKX, and any other cryptocurrency exchange, digital asset custodian, financial
10 institution, intermediary, or other person or entity identified in Appendix A or otherwise subject to
11 this Order, together with any additional documents required by law or prior order of this Court.
12 Service may be accomplished by any method previously authorized by this Court or otherwise
13 authorized by law, including blockchain-based electronic notice, blockchain token, blockchain
14 message, inscription, memo, electronic mail, overnight delivery, personal service, or any other
15 method reasonably calculated under all the circumstances to provide actual notice.

16
17 **IT IS SO ORDERED.**

18
19 DATED: 6/30/2026, 2026

20 

21 JUDGE OF THE SUPERIOR COURT
22 Daniel P. Maguire
23
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APPENDIX A

Binance (42)

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OKX (21)

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Gate.io (11)

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Kraken (2)

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KuCoin (1)

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