

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE, COUNTY, FLORIDA**

VISHAL GUPTA,)	
)	
Plaintiff,)	
)	
v.)	(Injunctive Relief Requested)
)	
JOHN DOE NOS. 1-25)	
)	
Defendants.)	
)	

COMPLAINT

Plaintiff Vishal Gupta ("Plaintiff"), by and through his undersigned counsel, brings this Complaint for claims of conversion and related equitable remedies against Defendants, and alleges as follows:

JURISDICTION AND VENUE

1. Plaintiff is a resident of New York, New York.
2. Defendants are persons of unknown citizenship who perpetrated the wrongdoing alleged herein. The true identity and residence of Defendants is currently unknown and is subject to ongoing investigation. Plaintiff will attempt to identify Defendants through discovery served on third parties with whom Defendants interacted if possible.
3. The Defendants operate throughout the United States, including in Miami-Dade County, Florida. The crypto wallets that currently hold the proceeds of the stolen Non-Fungible Tokens and other stolen funds are at TradeOgre, which operates throughout the U.S. including in this Court's jurisdiction.

4. Venue is proper in this Court as a substantial part of the events giving rise to the claims occurred in Miami-Dade County, Florida.

5. The Plaintiff reserves the right to amend this Complaint to include additional parties as Defendants, upon further investigation and discovery of their identities, roles, and residences.

STATEMENT OF FACTS

6. As detailed below, Defendants engaged in a “phishing” scheme to obtain the private keys to Plaintiff’s wallet.

7. In a typical “phishing” scheme, scammers use fraudulent e-mails or text messages to fool victims into providing sensitive information that they later use to steal from the victims.

8. In the instant case, although the specific phishing email or message that compromised Plaintiff’s credentials is unknown, on or about May 9, 2025, Defendants unlawfully accessed Plaintiff’s MetaMask wallet and stole approximately \$243,580.00 in cryptocurrency and non-fungible tokens (NFTs) belonging to Plaintiff. Please see Report attached as **Exhibit 1**.

9. NFTs are unique digital assets recorded on a blockchain that certify ownership of a specific item—such as artwork, collectibles, or other digital content—and are not interchangeable like traditional cryptocurrencies.

10. Plaintiff retained Inca Coalition (Inca), a company that specializes in assisting victims of cryptocurrency fraud to recover their assets.

11. According to Inca, Defendants converted Plaintiff’s assets and then sent them through a web of transactions designed to hide their trail. However, Inca was able to trace and connect Defendants’ transactions, follow the trail, and identify the cryptocurrency wallets that held Plaintiff’s funds. Inca has also identified where the stolen NFT is currently listed for sale.

12. Inca’s investigation involved two distinct phases, both of which were conducted using

precise, reliable, and replicable blockchain forensic techniques. In Phase One, Inca “forward traced” the movement of assets from Plaintiff’s compromised wallet—address 0x58b0AE061197C7c03DDDeE6747bF7A7bAB26D3ae8—to an initial recipient wallet, address 0x9b4fa7b9beea688f6c7356fd398dddd0a7cbd8c6, which is not linked to any known identity or custodial exchange. From there, stolen assets were further transferred to two additional wallets:

- 0xbd36c0a42a07b18fb12aa54ba1d33d06c03f990f, and
- 0x34C32427D9e22013960B7E9E42F7224037169a38

Both of these addresses subsequently sent large sums of Ethereum to TradeOgre’s primary hot wallet, address 0x4648451b5F87FF8F0F7D622bD40574bb97E25980, a centralized exchange that operates globally, including within the jurisdiction of this Court.

13. As of the date of this filing, the most valuable of the stolen NFTs—*Primary Abberation (Skulls of Luci)*—is publicly listed for sale on the NFT marketplace OpenSea at the following URL: <https://opensea.io/assets/ethereum/0xc9041f80dce73721a5f6a779672ec57ef255d27c/41>. This NFT was previously sold by the thief for approximately 54.725 WETH (valued at over \$128,000.00 at the time), and its continued circulation on OpenSea risks further dissipation of Plaintiff’s stolen property. Without immediate injunctive relief, this and other stolen NFTs may be resold to unwitting purchasers, further complicating recovery.

FIRST CAUSE OF ACTION **CONVERSION**

14. Plaintiff realleges and incorporates by reference paragraphs 1-13 as if stated fully in herein.

15. Plaintiff has lawful ownership and rights of possession of the property described herein.

16. Defendants intentionally and unlawfully took possession of the Plaintiff's funds, converting them for their own use through wrongful acts and in a manner that is inconsistent with plaintiff's property rights.

17. This act of conversion has caused significant damages and financial harm to the Plaintiff.

SECOND CAUSE OF ACTION
REQUEST FOR INJUNCTIVE RELIEF

18. Plaintiff realleges and incorporates by reference paragraphs 1-13 as if stated fully herein.

19. Plaintiff requests a freeze of all accounts associated with or receiving funds from wallet address 0x9b4fa7b9beea688f6c7356fd398ddddd0a7cbd8c6, the initial destination of the stolen cryptocurrency and NFTs. Plaintiff further requests a freeze of all assets held in or transmitted through the following wallets that received proceeds from the theft: 0xbd36c0a42a07b18fb12aa54ba1d33d06c03f990f, 0x34C32427D9e22013960B7E9E42F7224037169a38, and any other account known to TradeOgre's as owned by Defendant or associated with Defendant that sent money to TradeOgre's omnibus wallet 0x4648451b5F87FF8F0F7D622bD40574bb97E25980. In addition, Plaintiff requests that all NFT marketplaces, including OpenSea, be enjoined from listing or facilitating the sale of stolen NFTs, including *Primary Abberation (Skulls of Luci)*, which is currently listed for sale at <https://opensea.io/assets/ethereum/0xc9041f80dce73721a5f6a779672ec57ef255d27c/41>.

20. Such a freeze is necessary to preserve the possibility of restitution for the Plaintiff and other victims.

21. Plaintiff has no adequate remedy at law.

22. Plaintiff will suffer irreparable harm if an injunction is not issued by this Court.

23. Plaintiff has a clear legal right to the property contained in the wallets he seeks to enjoin.

24. It is in the public interest for the Plaintiff's property to be preserved through injunctive relief.

Wherefore, Plaintiff respectfully requests that this Court enter a temporary and/or permanent restraining order and freeze the cryptocurrency addresses set forth herein, and an order awarding: (1) damages in the amount of the value of Plaintiff's and other Class Members' stolen assets at the time of the theft; (2) pre-judgment interest; (3) an injunction ordering the return of any remaining stolen assets or the proceeds derived from the same; (4) attorneys' fees and costs incurred in prosecuting this action; and (5) any other relief that the Court finds just and proper.

Respectfully submitted and filed on May 15, 2025

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**INCA
DIGITAL**

inca.digital

0x58b0AE061197C7c03DD
eE6747bF7A7bAB26D3ae8

Phishing Attack On-Chain
Forensics



Ex 1

On May 9, 2025, the address 0x58b0AE061197C7c03DDDeE6747bF7A7bAB26D3ae8 (0x5b0A) was drained by a suspected phishing attack. Inca Digital performed on-chain forensics in order to determine the final destination of these stolen funds. Additional attribution and blockchain research is available upon request.

On Chain Analysis

Analysis of the victim's address, 0x58b0A, shows that funds began to drain at 5:04 pm EST (9:04:47 UTC) on May 9, 2025. These stolen funds were all sent to an unattributed address 0x9b4fa7b9beea688f6c7356fd398ddddd0a7cbd8c6 (0x9b4f). In addition to tokens, five NFTs were also transferred to this address. A breakdown of the specific tokens are listed below.

These specific transactions are located in *Appendix A - Stolen*

0x58b0AE061197C7c03DDDeE6747bF7A7bAB26D3ae8 Fund Transactions.

Name	Value	USD Equivalent
Coinbase Wrapped Ethereum (cbETH)	8.706172	\$22,227.90
Wrapped Ethereum (WETH)	0.441861	\$1,031.43
Uniswap (UNI)	400	\$2,568.00
Circle USD (USDC)	1,024.46	\$1,024.45
Sum Total		\$26,851.78

Specific tokens stolen from 0x58b0A with historical USD equivalent

In addition to these tokens, five NFTs were also transferred out of this wallet into the same address:

- #6 (Luci in Nothingland)
- What A Surprise (NFT)
- vkg (The Pixel Portraits)
- Primary Abberation (Skulls of Luci)
- CryptoSkull #8486 (CryptoSkulls)

After removing these tokens and NFTs from 0x58b0A, the recipient address 0x9b4f sold two of the NFTs. Primary Abberation was sold to an address with the ENS domain trueformjoker.eth, 0xD2ce17b0566dF31F8020700FBDA6521D28d98C22, for 54.725 WETH (\$128,039.04 USD).¹

¹ Etherscan: [0xedc8c13843cb2017e645609c1de80a058d0c1a866b887d9448519d5ce48ada42](https://etherscan.io/tx/0xedc8c13843cb2017e645609c1de80a058d0c1a866b887d9448519d5ce48ada42); 9 May 2025.

CryptoSkull #4846 was sold to an unattributed address, 0x5Da05d81ba4b4716BBc4631F9ed712D78a0baE08, for 0.0808935 WETH (\$189.42).² Both NFTs were later sold out of those secondary addresses shortly thereafter. The remaining three NFTs can still be located at 0x9b4f as of May 14, 2025.

The stolen tokens were all converted into Ethereum (ETH) and WETH, which led to a total of 55.24775541 WETH being unwrapped into ETH. The associated transactions are listed below:

- cbETH into ETH:
[0x709d39e42196af3bf3f8ec8c77dcdccdad13d36e6a4938f694655e193ca67519](#)
- UNI into WETH:
[0xeeedc6f7d2fcd1ae15d8047c5c80784974b0713b938032924f0143cf42f6b4f2](#)
- USDC into ETH:
[0x870f28d172af2e7914212cd5b43911493f0e1d285fb04a8329970b4a9bad5f49](#)
- Unwrapped WETH:
[0x324c5a9cdd1decdb558a30c825ff168a8858cbdf49a0930e8ef4fd912242030f](#)

After converting all stolen funds into ETH through various means, 0x9b4f transferred different amounts of ETH into two unattributed addresses.

- 0xbd36c0a42a07b18fb12aa54ba1d33d06c03f990f (0xbd36) received 46.879851754079071877 ETH (\$109,673.45) over two transactions:
 - [0xe5e710ad8cb073badd3add262516780fdee136c7c00287c7173874dee7c34fd3](#)
 - [0x0dbdb1ab83f6874ed57074090b53c3a34c8769ae6f644059e49e94c8786e6c06](#)
- 0x34C32427D9e22013960B7E9E42F7224037169a38 received 20 ETH (\$46,789.16) over two transactions as well:
 - [0x335e4acced0d3b489bcbdbab84f4408d45e7d82c8a54c3f4fdfa0f1bd1de15b06](#)
 - [0x1b9de21fe7d00eb18fbf923128cd88ef77f58cd72867ffcfd3df616c2cf60e9](#)

Both of these addresses proceeded to deposit this ETH into TradeOgre's main hot wallet, 0x4648451b5F87FF8F0F7D622bD40574bb97E25980.

- 46.87983495 ETH (\$121,126.71) was sent from 0xbd36:
 - [0xb9f788abbe983294f2d6db57487c3be485bc3a72dce2eab40ef5b8c081f9d6bf](#)
- 19.9999832 ETH (\$51,675.36) was sent from 0x34C3:
 - [0x7f1b0639555db9ec35775d3c0a355d8ee4ea76b95710f917685943d4e03a08e4](#)

Upon the identification of TradeOgre receiving these funds, Inca Digital contacted the exchange on the social media platform, X. TradeOgre first claimed that these transactions were a "sweep" and funds left the platform; however, there were no outbound transactions from the TradeOgre hot wallet at the time. Inca informed TradeOgre that we believed this to be a deposit to their exchange and had not seen any funds leaving their hot wallet. The TradeOgre account asked additional questions, which Inca answered. Shortly afterwards, the account stopped responding.

² Etherscan: [0xe522fd71a3046d93ce662517a5e07c801bd5bb086d15d4340d5ce3dd6b434019](#); 9 May 2025.

Appendix A - Stolen

0x58b0AE061197C7c03DDDeE6747bF7A7bAB26

D3ae8 Fund Transactions

Transaction Hash	Type	Method	Time	To	Value (USD)	Asset
0x47bf276a07ea09ea173a56f2b210ff1bed2817efe23e889276b317c93ff29e38	Tx	Transfer	2025-05-09 22:25:47	0x9B4FA7B9beEa688F6c7356FD398dDDD0a7cbD8C6	\$7.79	Ethereum(ETH)
0x3a6d358851722cd3f2896776763068003dbdc43f0f3430c760ca1e7987ab6045	Tx	Safe Transfer From	2025-05-09 21:08:23	0x0Af0C0E73f4527De064c1556dD5AB2866D026f2F	\$0.00	Ethereum(ETH)
0x3a6d358851722cd3f2896776763068003dbdc43f0f3430c760ca1e7987ab6045	ERC-1155	Safe Transfer From	2025-05-09 21:08:23	0x9B4FA7B9beEa688F6c7356FD398dDDD0a7cbD8C6	N/A	Luci in Nothingland
0xb46a8b8b35fade73e60a20a4ce27e3e3fd7d0e0cc86c6acd4d9d6205beb8203b	Tx	Safe Transfer From	2025-05-09 21:08:11	0x387a8879192b80fC05bcE72150c223A4Ba7D454B	\$0.00	Ethereum(ETH)
0xb46a8b8b35fade73e60a20a4ce27e3e3fd7d0e0cc86c6acd4d9d6205beb8203b	ERC-1155	Safe Transfer From	2025-05-09 21:08:11	0x9B4FA7B9beEa688F6c7356FD398dDDD0a7cbD8C6	N/A	NFT
0x8680b34c8960dce7a733643b6c04e0c5476f453dae963efcc5868eda5e17531e	Tx	Transfer From	2025-05-09 21:07:23	0xa8121b153c77ca4dd1da3a9d7cdc4729129c8c6d	\$0.00	Ethereum(ETH)
0x8680b34c8960dce7a733643b6c04e0c5476f453dae963efcc5868eda5e17531e	ERC-721	Transfer From	2025-05-09 21:07:23	0x9B4FA7B9beEa688F6c7356FD398dDDD0a7cbD8C6	N/A	The Pixel Portraits
0xceb0f82abf043655e4c7316fd1202978dc21335cbb1dc18cc07bc5a6fa56d0d5	Tx	Transfer From	2025-05-09 21:06:59	0xc9041f80dce73721a5f6a779672ec57ef255d27c	\$0.00	Ethereum(ETH)
0xceb0f82abf043655e4c7316fd1202978dc21335cbb1dc18cc07bc5a6fa56d0d5	ERC-721	Transfer From	2025-05-09 21:06:59	0x9B4FA7B9beEa688F6c7356FD398dDDD0a7cbD8C6	N/A	Skulls of Luci

0xac167a41045403f0 9732d4f2523bfb383b 075c735162e191243 4d86a7effef72	Tx	Transfer From	2025-05-09 21:06:35	0xc1caf0c19a8ac28 c41fe59ba6c754e4b 9bd54de9	\$0.00	Ethereum(ETH)
0xac167a41045403f0 9732d4f2523bfb383b 075c735162e191243 4d86a7effef72	ERC-721	Transfer From	2025-05-09 21:06:35	0x9B4FA7B9beEa68 8F6c7356FD398dDD D0a7cbD8C6	N/A	CryptoSkulls
0xc0056b6d540c596 ed6cdf216bf8d99604 7229af98153ecc7ea5 c600891f5bcad	Tx	Transfer	2025-05-09 21:05:11	0xc02aaa39b223fe8 d0a0e5c4f27ead908 3c756cc2	\$0.00	Ethereum(ETH)
0x111c96746e699669 48acfd03db69f13b2c ec6a0c616ef96957f7 9486193c8daa	Tx	Transfer	2025-05-09 21:05:11	0xa0b86991c6218b3 6c1d19d4a2e9eb0c e3606eb48	\$0.00	Ethereum(ETH)
0xc0056b6d540c596 ed6cdf216bf8d99604 7229af98153ecc7ea5 c600891f5bcad	ERC-20	Transfer	2025-05-09 21:05:11	0x9B4FA7B9beEa68 8F6c7356FD398dDD D0a7cbD8C6	\$1,028.37	Wrapped Ether(WETH)
0x111c96746e699669 48acfd03db69f13b2c ec6a0c616ef96957f7 9486193c8daa	ERC-20	Transfer	2025-05-09 21:05:11	0x9B4FA7B9beEa68 8F6c7356FD398dDD D0a7cbD8C6	\$1,024.46	USDC(USDC)
0xda7c4b37f2593617 4805cd4c858fbfc655 0eccfc3231ddb89c29 cf394ded2bc7	Tx	Transfer	2025-05-09 21:04:59	0x1f9840a85d5af5bf1 d1762f925bdaddc420 1f984	\$0.00	Ethereum(ETH)
0xda7c4b37f2593617 4805cd4c858fbfc655 0eccfc3231ddb89c29 cf394ded2bc7	ERC-20	Transfer	2025-05-09 21:04:59	0x9B4FA7B9beEa68 8F6c7356FD398dDD D0a7cbD8C6	\$2,604.00	Uniswap(UNI)
0x444c5ca82e7b765 17317353acf2b9525e 05f1fe3d35b5b7161d 84c46f2144ea6	Tx	Transfer	2025-05-09 21:04:47	0xbe9895146f7af430 49ca1c1ae358b0541e a49704	\$0.00	Ethereum(ETH)
0x444c5ca82e7b765 17317353acf2b9525e 05f1fe3d35b5b7161d 84c46f2144ea6	ERC-20	Transfer	2025-05-09 21:04:47	0x9B4FA7B9beEa68 8F6c7356FD398dDD D0a7cbD8C6	\$22,420.31	Coinbase Wrapped Staked ETH(cbETH)

Search OpenSea

Connect Wallet

Primary Aberration

Skulls of Luci Owned by 0x035...b4a0

ERC-1111 ETH/USD TOKEN #41

TOP OFFER 30.00 WEETH COLLECTION FLOOR

PARTY

TOKEN ID 41

LAST SALE 65.00 ETH

TRAITS 3

RAREST
Sam Spratt

THE BLUESPIRIT SKULL CONTRACT ADDRESS
0xb952a70d5f67368974c7be830e8d...

THE BLUESPIRIT SKULL TOKEN ID
33019

Activity Orders About

45 ETH	7 PM	8 PM	9 PM	10 PM	11 PM	12 AM	1 AM	2 AM	3 AM	4 AM	5 AM	6 AM
47 ETH												
48 ETH												
56 ETH												

All Sale Listing Buy Offer Transfer Mint

EVENT	PRICE	FROM	TO	TIME
Sale	65.00 ETH	MIDGA	42d6tb	5d ago
Sale	55.00 WEETH	9x467	Birdo	6d ago
Mint	-	NullAddress	Sam Spratt:SkullsOfLuci	3y ago

Ex2