

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

RACHEL POUYAFAR, on behalf of herself)	
and all others similarly situated,)	
)	Index No. 654820/2023
Plaintiff,)	
)	
-against-)	AFFIRMATION
)	OF CHARLES ZACH
YUNHAI QUAN and JOHN DOE NOS. 1-25,)	IN SUPPORT OF
)	MOTION TO SEAL
Defendants.)	
)	

I, Charles Zach, affirm under penalty of perjury as follows:

INTRODUCTION

1. I am an employee at Inca Digital, a company that investigates cryptocurrency schemes and frauds, including “pig butchering.” As part of my employment at Inca Digital, I have investigated matters related to the above-captioned action. I am over 18 years of age, of sound mind, and am competent to make this Affirmation. The evidence set forth in the foregoing Affirmation is based on my personal knowledge unless expressly stated otherwise.

2. This Affirmation is submitted in support of Class Plaintiff Rachel Pouyafar’s Order to Show Cause for a sealing order to allow her to file under seal certain documents and portions of documents, and publicly file redacted versions of those documents.

3. The documents and information sought to be filed under seal include (i) the First Amended Complaint in this action, (ii) the Proposed Order to Show Cause concerning Class Plaintiffs’ Motion for a TRO and Preliminary Injunction, (iii) the Memorandum of Law in Support of Class Plaintiff’s Motion for a TRO and Preliminary Injunction dated December 8, 2023, and (iv) the Affirmation of Charles Zach in support of the request for a TRO and Preliminary Injunction dated December 8, 2023 (together, the “Requested Sealing Documents”),

at least until such time as the Court enters a TRO freezing the assets at issue in the Amended Complaint and the assets have been successfully frozen.

4. Background on pig butchering generally, along with the details of the movement of crypto assets stolen by Defendants from Class Plaintiff Rachel Pouyafar are provided in my Affirmation dated September 29, 2023 ([NYSCEF Doc. No. 5](#)).

5. The Requested Sealing Documents describe Class Plaintiff's further investigation into Defendants' movement of stolen crypto assets belonging to additional victims, including those similarly situated to Pouyafar (the "Class Members").

6. The Requested Sealing Documents detail specific information about Defendants' scheme to use "pig butchering" to misappropriate the cryptocurrency assets of numerous prospective Class Members.

7. Based on my experience tracing stolen crypto assets, if the information about cryptocurrency assets in the Requested Sealing Documents was publicly disseminated and Defendants or people in contact with them became aware of that information it is very likely that Defendants will move the stolen assets from their current locations.

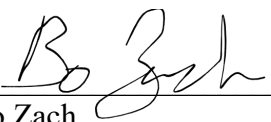
8. Due to the nature of cryptocurrency assets, Defendants would be able to move these assets very quickly, with no notice to the Class Members.

9. If Defendants moved Class Members' assets from where they are currently held, it is very likely that those assets could no longer be traced and Class Members would never be able to recover those assets.

10. I affirm this 8th day of December, 2023, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that I am physically located outside the geographic boundaries of the United States, Puerto Rico, the United States Virgin

Islands, or any territory or insular possession subject to the jurisdiction of the United States, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Dated: Sinj, Croatia
December 8, 2023

By: 
Charles Bo Zach

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Certification Pursuant to 22 NYCRR § 202.8-b

I, Rishi Bhandari, at attorney duly admitted to practice law before the courts of the State of New York, hereby certifies that this Affirmation contains 677 words, excluding the parts exempted by § 202.8-b(b), and therefore complies with the word count limit set forth in 22 NYCRR § 202.8-b(a).

Dated: New York, New York
December 8, 2023

By: /s/ Rishi Bhandari
Rishi Bhandari, Esq.