

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

RACHEL POUYAFAR,)	
)	
Plaintiff,)	Index No. 654820/2023
)	
-against-)	
)	
JOHN DOE NOS. 1-25,)	
)	
Defendants.)	
)	

AFFIDAVIT OF RACHEL POUYAFAR

I, Rachel Pouyafar, declare under penalty of perjury as follows:

1. I am Rachel Pouyafar, over 18 years of age, of sound mind and otherwise competent to make this Affidavit. The evidence set forth here is based on my personal knowledge. I submit this Affidavit in support of the above-captioned Complaint and Proposed Order to Show Cause and Temporary Restraining Order.
2. I reside at 301 E. 66th St, Unit 3M, New York, NY 10065.
3. I am a real-estate agent with Compass, Inc., a real estate brokerage headquartered in New York.
4. I was first contacted by a person representing himself to be named “Yunhai Quan” (“Quan”) on July 20, 2023 via WhatsApp. Quan stated that he had found my information online and was contacting me because he wanted to buy a residence in New York. Quan told me that “I want to buy a modern style house with 4 to 5 bedrooms, 4 to 5 bathrooms, about 4,000 square feet, and my budget is \$5.7 million.”

[7/20/23, 5:01:24 PM] Yunhai Quan: Messages and calls are end-to-end encrypted. No one outside of this chat, not even WhatsApp, can read or listen to them.
[7/20/23, 5:01:24 PM] Yunhai Quan: <attached: 00000002-07-20-17-01-24.jpg>
[7/20/23, 5:01:36 PM] Yunhai Quan: Hi, is this Rachel?
[7/20/23, 5:01:39 PM] Yunhai Quan: I am Yunhai.
[7/20/23, 5:04:19 PM] Rachel Pouyafar: Hi
Yes this is Rachel
[7/20/23, 5:07:42 PM] Yunhai Quan: I am looking to purchase a property in Manhattan for my own residence and would like your help if you are still in the market.
[7/20/23, 5:10:57 PM] Rachel Pouyafar: Of course
Its my pleasure to help you
[7/20/23, 5:11:16 PM] Rachel Pouyafar: Where do you currently reside
[7/20/23, 5:12:26 PM] Yunhai Quan: I currently live in CA.
[7/20/23, 5:13:00 PM] Rachel Pouyafar: I'm jealous
I used to live in LA 😊
[7/20/23, 5:13:34 PM] Rachel Pouyafar: Let's connect and chat
When is a good time for you?
[7/20/23, 5:14:38 PM] Yunhai Quan: I want to buy a modern style house with 4 to 5 bedrooms, 4 to 5 bathrooms, about 4,000 square feet, and my budget is \$5.7 million.
[7/20/23, 5:14:58 PM] Yunhai Quan: I live in Irvine. 😊
[7/20/23, 5:15:37 PM] Rachel Pouyafar: Thats great
Let's chat so I can tailor it to your needs

5. Quan represented that he was a wealthy former investment banking executive living in California, where he had moved to start his own trading firm. He stated that he previously had worked as a Vice President at Goldman Sachs. Quan said he was unable to visit New York at the time to view properties in person, due to his affluent lifestyle and travel, including weekend yacht getaways and international travel.

6. At this time, I faced significant financial difficulties and pressure. I had lost my job during the COVID-19 pandemic, and had begun attempting to restart my career by working in real estate. I have been the primary financial supporter of both my daughter and my ailing mother, who recently lost her vision. I previously had taken out a \$131,600 government loan to provide for my family while I established myself as a New York real estate agent. After my financial struggles, I was eager to pursue a conversation with Quan, given his apparent affluent lifestyle and the prospect of selling him a property in New York.

Loan Type	Borrower	Status	Outstanding Balance	
Disaster COVID-19 Economic Injury	Rachel Pouyafar	Disbursed Current	\$131,600.00	Actions ▾

7. As part of our conversation regarding New York real estate, Quan asked if I knew about investing in cryptocurrency and presented an investment opportunity through his purported

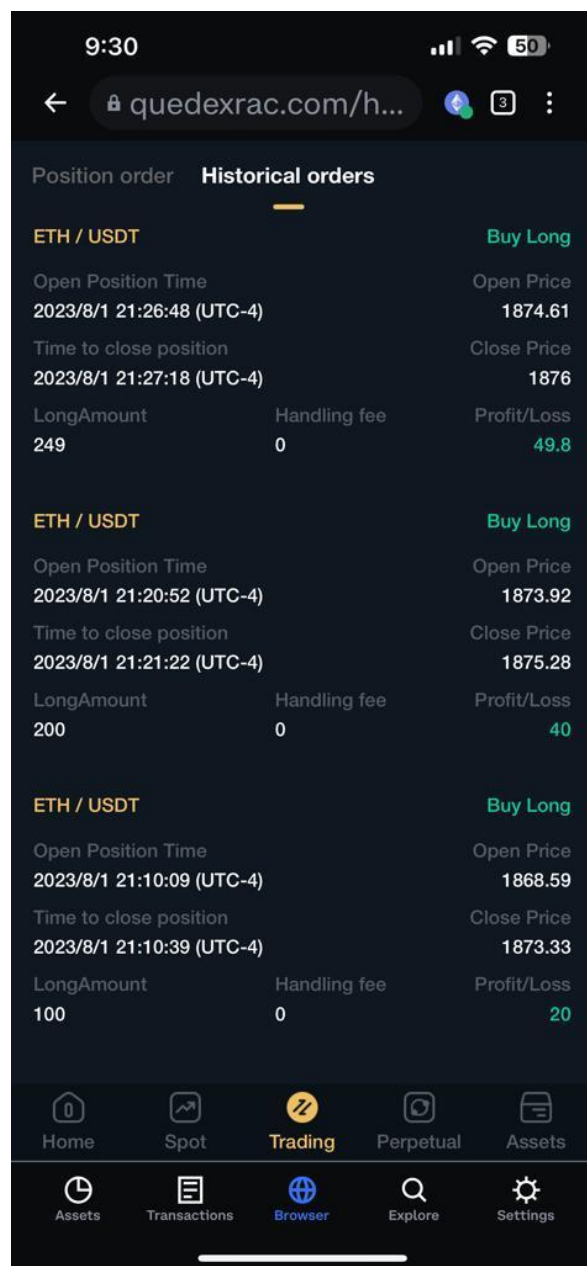
trading firm. Quan represented that I would receive returns on my investment if I invested with him. He further represented that he would give me investing advice if I would help him find a house in New York. I believed that this investment opportunity was a religious blessing for the hardship I had endured through losing my employment during the pandemic. I intended to use the profits from the investment opportunity to support my mother and daughter.

[7/28/23, 5:43:28 PM] Yunhai Quan: My friend used BTC when he bought a house in Miami, so that's why I'm asking.
[7/28/23, 5:43:52 PM] Yunhai Quan: I wondered if New York was ahead of its time as well.
[7/28/23, 5:45:34 PM] Yunhai Quan: Now that the world is developing a digital economy, the trend of cryptocurrency is unstoppable. Many industries are using cryptocurrency technology for payments, how much do you know about it?
[7/28/23, 5:46:06 PM] Rachel Pouysfar: True
[7/28/23, 5:50:57 PM] Yunhai Quan: How much do you know about cryptocurrencies?
[7/28/23, 5:52:36 PM] Rachel Pouysfar: I thought to get by I'm not a professional at cryptocurrency I try to keep myself up to date
[7/28/23, 5:53:53 PM] Rachel Pouysfar: As you can tell, I'm very upfront and honest
[7/28/23, 5:55:56 PM] Yunhai Quan: I can give you some help and advice in the cryptocurrency field if you can help me find a suitable house, I also have over 10 years of experience and knowledge in cryptocurrency investment. I am very confident in myself and my team as you would be in real estate. ●●●●●●●●●●
[7/28/23, 5:56:45 PM] Yunhai Quan: You can learn more about this in general, and it may broaden your sources of clients and groups in real estate in the future. This will be good for you.
[7/28/23, 5:57:18 PM] Rachel Pouysfar: Thank you that is a great idea
[7/28/23, 6:04:27 PM] Yunhai Quan: Sure. When do you plan to send me the list of properties?
[7/28/23, 6:10:19 PM] Rachel Pouysfar: Give me a day or two please
[7/28/23, 6:27:06 PM] Yunhai Quan: 1-2 days?
[7/28/23, 6:27:58 PM] Rachel Pouysfar: To create a bunch of appropriate listings for you
[7/28/23, 6:28:19 PM] Yunhai Quan: Okay, it's long, but that's okay, I'm willing to wait.

8. Quan enticed me to invest through a website that he said, and I believed, was QuedEx, a cryptocurrency exchange. He provided me with a link to what appeared to be my investment account at QuedEx,¹ and he instructed me to make and complete trade orders at that website. I thought this website was legitimate at the time.

9. Quan persuaded me to deposit funds—initially just \$500 on July 31, 2023—in what appeared to be my account at QuedEx. Quan then reported to me that I had made \$90 of profit from this investment in cryptocurrency assets.

¹ quedextrac.com/h5#/home.



10. Quan immediately urged me to deposit \$50,000 more, and I agreed to do so, based on his representations. He then reported that I had again made profits from cryptocurrency assets. This time, Quan transferred the amount of those purported profits, \$8,563.57, to me. I believed these transactions were legitimate, particularly because I actually received these funds.

11:58 56% 52%

← Confirm cash out

\$8,693.98

To	Chase
From	Cash (USD)
Funds will arrive	⚡ Instantly
Cash out amount	\$8,563.57
Cash out fee ⓘ	\$130.41
Total	\$8,693.98

Cash out now

11. After receiving this money, I deposited more money during August 2023, and I received additional reports of purported profits. In all, between August 1, 2023 and August 21, 2023, I sent five transactions totaling 50,468.519489 USDC and 82.0994033 ETH from my Coinbase account to Ethereum address 0xf611bd67bb3ac6fc501a8fc990a950eea36bf903, which I believed was associated with QuedEx. In total, I deposited a total of approximately \$240,500 in the above wallet address as follows:

July 31, 2023: \$500.00
 August 2, 2023: \$50,000
 August 7, 2023: \$50,000
 August 11, 2023: \$50,000
 August 21, 2023: \$50,000
 August 22, 2023: \$40,000

AUG 21, 2023 06:59:23 PM	ETH	29,377,59565	0x2d8329deef12175f1696ef9700283e9af25ca2c45aff1c1ad562a79dd009c1ab	0xe8044fa8f33cd2b12e52d6746f489a58fb4afcd0	
AUG 21, 2023 06:02:11 PM	ETH	29,378,03080	0x585c6d25e92e40fc8837f15342d4083fc09d04fd517d48a7b31b00b6270c2c	0xa9d1e08c7793af67e9d92fe308d5697fb81d3e43	Coinbase EXCHANGE
AUG 12, 2023 01:17:23 AM	USDC	49,988,51948900	0x925dfdd735b9d76b9a4afeef794f37207f59aff667fec6769f9cb6d8ad86302	0xe8044fa8f33cd2b12e52d6746f489a58fb4afcd0	
AUG 12, 2023 01:17:23 AM	ETH	0.00000000	0x925dfdd735b9d76b9a4afeef794f37207f59aff667fec6769f9cb6d8ad86302	0xa0b86991c621b36c1d19d4a2e9eb0ce3606eb48	USD Coin SERVICES
AUG 12, 2023 01:00:47 AM	ETH	0.00160830	0x2b4f325148fd76bb299e60521021ad49465887bd4aa4cb0678555d1d119901	0x9d8dd477b15fda345bda8111896b28136b5401bc	
AUG 12, 2023 12:59:11 AM	USDC	49,988,51948900	0xaf4e1eacd7d3dd919ae14e185be7eb4fb5da8362ae920139d290e519c00b9bc	0xa9d1e08c7793af67e9d92fe308d5697fb81d3e43	Coinbase EXCHANGE
AUG 9, 2023 03:11:23 AM	ETH	26,245,29619	0x2541b7eefa7692b2eb9e9cc7d538bc0acd964efc76ceb2807d0b8151dd4d6c4	0xe8044fa8f33cd2b12e52d6746f489a58fb4afcd0	
AUG 9, 2023 03:18:11 AM	ETH	26,245,25684	0xe62124939b97bbf0bd9585e5a3f975a911e68207c35d4bd7064f372f119e681b5	0xa9d1e08c7793af67e9d92fe308d5697fb81d3e43	Coinbase EXCHANGE
AUG 2, 2023 06:52:23 PM	ETH	26,477,19610	0x978ca936613c19e1dac17d8706c2a0874d8f048093f35698ea98b92699823cb4	0xe8044fa8f33cd2b12e52d6746f489a58fb4afcd0	
AUG 2, 2023 06:42:11 PM	ETH	26,475,84575	0xe4576fd0e693aa95a103cd7bd712518653e83ee1a61e4cace48d74183d76319	0xa9d1e08c7793af67e9d92fe308d5697fb81d3e43	Coinbase EXCHANGE
AUG 1, 2023 04:53:59 AM	USDC	480,000,00000	0x9a273ae51b6782c71af109978e9e6a883f2c5bf428c262a6d401d799046db518	0xe8044fa8f33cd2b12e52d6746f489a58fb4afcd0	
AUG 1, 2023 04:53:59 AM	ETH	0.00000000	0x9a273ae51b6782c71af109978e9e6a883f2c5bf428c262a6d401d799046db518	0xa0b86991c621b36c1d19d4a2e9eb0ce3606eb48	USD Coin SERVICES
AUG 1, 2023 04:43:23 AM	ETH	0.00368063	0x8b589fedbac76470ab96be7d30332e6d92a682c3f11490bc719e8a9c72f3771	0x524e09d03a56bfc6f6581bc5c51338b875e344f	
AUG 1, 2023 04:09:11 AM	USDC	480,000,00000	0x74c4fd0aac5dddb35ff0b3b42aefee5ab196fb6d756b9231f185d8ab539c2ef	0xa9d1e08c7793af67e9d92fe308d5697fb81d3e43	Coinbase EXCHANGE

12. On August 22, 2023, Coinbase, the centralized cryptocurrency exchange that I was using to convert my deposits to cryptocurrency, notified me that it had noticed suspicious transactions occurring on my account and froze \$37,850. This money was returned to my bank account. The remaining \$202,650 remains in Quan's possession.

13. I understand from the investigation by my counsel that Quan manipulated the website and link they sent me to show me fake "returns" on my investment. I further understand that, in actuality, the funds I sent to wallet address 0xf611bd67bb3ac6fc501a8fc990a950eea36bf903 were never associated with an investment account. Instead, Quan presented me with fraudulent data that I believed to be my trading activity.

14. Before the investigation by my counsel, I was not aware of transactions undertaken to hide and steal my cryptocurrency assets. I would be severely harmed if I am unable to recover those assets. I submit this Affidavit in support of my request for emergency

relief by order to show cause for a preliminary injunction, and a temporary restraining order pending the heading on the preliminary injunction.


Rachel Pouyafar

Sworn to before me this 28th of September, 2023


Notary Public

Kavi Bhatia
NOTARY PUBLIC STATE OF NEW YORK
NO. 01BH6415326
QUALIFIED IN NASSAU COUNTY
CERTIFICATE FILED IN NEW YORK COUNTY
COMMISSION EXPIRES MARCH 15, 2025