

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

SHAMEELA KARMALI-RAWJI, on behalf  
of herself and all others similarly situated,

Plaintiff,

v.

TRUSTWAVE.TRADE, AVIV NAFTALI,  
JANE DOE 1, and JOHN DOE NOS. 1-10,

Defendants.

Index No. 150162/2025

AFFIRMATION OF  
ADAM ZARAZINSKI IN SUPPORT OF  
PLAINTIFF’S MOTION TO SEAL

I, ADAM ZARAZINSKI, affirm the following under penalty of perjury, pursuant to C.P.L.R.

§ 2106:

**INTRODUCTION**

1. I am employed as the Chief Executive Officer of Inca Digital, a company that specializes in financial risk intelligence and investigating cryptocurrency schemes, including “pig butchering.” As part of my employment at Inca Digital, I have investigated matters related to Shameela Karmali-Rawji’s (“Class Plaintiff”) above-captioned action against Defendants Trustwave.Trade, Aviv Naftali, Jane Doe 1, and John Does Nos. 1-10 (collectively “Defendants”). I am over 18 years of age, of sound mind, and am competent to make this Affirmation. The evidence set forth in this Affirmation is based on my personal knowledge unless expressly stated otherwise.

2. Inca Digital is a leading digital asset intelligence firm providing data, analytics, and expertise to cryptocurrency exchanges, financial institutions, regulators, and government agencies. Inca Digital’s services are used to trace illicit financial activity and combat fraud, particularly in cases involving complex cryptocurrency schemes.

3. I hold a J.D. from the University of Michigan Law School, a Master’s Degree in International Relations from the University of Nottingham, and a Bachelor of Arts in Political Science from DePaul University. I have leveraged my specialized knowledge of blockchain technology, digital asset ecosystems, and regulatory frameworks to serve as an expert witness in cryptocurrency-related litigation and testified at the House Financial Services Subcommittee on National Security, Illicit Finance, and International Financial Institutions on terrorist financing. Prior to my work at Inca Digital, I worked as an intelligence analyst at INTERPOL and served in the United States Air Force as a judge advocate. I continue to serve as Major in the USAF JAG Corps Reserve

4. Inca Digital has been investigating “pig butchering” cases for over four years. “Pig butchering” is a fraudulent scheme in which victims are manipulated into investing in fake cryptocurrency platforms, often through social media or messaging applications. These scams have resulted in billions of dollars in losses and are under investigation by both state and federal authorities. Based on my extensive experience in investigating such schemes, this case clearly involves a coordinated and large-scale “pig butchering” operation.

5. In this case, the fraudulent scheme revolves around several fake cryptocurrency trading and investment platforms. Defendants used these platforms to lure Class Plaintiff and other class members into transferring cryptocurrency to wallets that Defendants controlled. The goal of this class action is to freeze the wallets holding the converted funds and facilitate the return of these stolen assets to the defrauded Class Members.

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

7. The documents and information sought to be filed under seal include (i) Class Plaintiff’s Complaint and Appendix A, (ii) Class Plaintiff’s Affirmation in support of her proposed Order to Show Cause for a preliminary injunction and a temporary restraining order, dated January 5, 2025, (iii) the Affirmation of Adam Zarazinski in support of the request for a Temporary Restraining Order and Preliminary Injunction dated January 5, 2025, (iv); the Affirmation of John Curran in support of the request for a Temporary Restraining Order and Preliminary Injunction dated January 5, 2025 and (v) the Memorandum of Law in Support of Class Plaintiff’s Motion for a TRO and Preliminary Injunction (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.

8. The Requested Sealing Documents describe Class Plaintiff’s investigation into Defendants’ movement of stolen crypto assets belonging to him and similarly situated class members.

9. The Requested Sealing Documents detail specific information about Defendants’ scheme to use “pig butchering” to misappropriate the cryptocurrency assets of numerous prospective Class Members.

10. Based on my experience tracing stolen crypto assets, if the information in the Requested Sealing Documents is publicly disseminated and Defendants or people in contact with them became aware of that information – which includes descriptions of the role and addresses of various cryptocurrency wallets involved in Defendants’ scheme, and details of wallets Class Plaintiff seeks to freeze – it is very likely that Defendants will move the stolen assets from their current locations.

11. Due to the nature of cryptocurrency assets, Defendants would be able to move


Class Plaintiff's and class members' assets very quickly, with no notice to Class Plaintiff or class members.

12. If Defendants moved these assets from where they are currently held, it is very likely that those assets could no longer be traced and Class Plaintiff and class members would never be able to recover those assets.

13. I am familiar with the process of providing notice via the Input Data Message process, whereby a message with a link to a website containing documents is sent using the Input Data field on a transaction on the Ethereum blockchain. In my experience, the method of notice proposed in the Proposed Order to Show Cause and Temporary Restraining Order is reasonably calculated to and would likely result in actual notice of those documents to the individuals or entities that control those wallets, and the existence and contents of those service tokens would be readily apparent to the owners.

14. I affirm this 5th day of January, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, 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: January 5, 2025

DocuSigned by:  
  
By: \_\_\_\_\_  
CAC32ADB9CDD4CE...  
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**Certification Pursuant to 22 NYCRR § 202.8-b**

I, John Curran, an attorney duly admitted to practice law before the courts of the State of New York, hereby certifies that this Affirmation contains 936 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  
January 5, 2025

By: /s/ John Curran  
John Curran