

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

STEPHEN B. SHAYA, on behalf of
Himself and all others similarly situated,

Plaintiff,

Case No. 24-cv-10670

Hon. Mark A. Goldsmith

v.

KYLIE NOFS, ZHU SHICAI, LUO
YANBING, LIN YIN, YANG ZHENLIN,
and JOHN DOE NOS. 1-25,

Defendants.

ALTIOR LAW, P.C.
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**PLAINTIFF’S EMERGENCY MOTION FOR TEMPORARY
RESTRAINING ORDER AND FOR ORDER TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Plaintiff Stephen Shaya (“Shaya”), individually and on behalf of all others similarly situated, by and through his undersigned counsel, Altior Law, P.C., moves for entry of a temporary restraining order and order to show cause why a preliminary injunction should not issue pursuant to Fed. R. Civ. P. 65 to preserve the *status quo*

and enjoin the withdrawal, transfer, disposition, sale, or encumbering of cryptocurrency stored in specific wallets and procured by Defendants through a “pig butchering” scheme as set forth in Plaintiff’s Complaint and the attached Brief in Support. In support of this motion, Shaya relies on the facts and law discussed in the attached Brief in Support, and exhibits thereto.

In accordance with Fed. R. Civ. P. 65(1) and the attached Declaration of Kenneth F. Neuman, Shaya moves for a temporary restraining order without notice to Defendants. Such notice is highly likely to precipitate the Defendants involved in the scheme to transfer or sell the cryptocurrency held in the specific wallets identified to date, thereby thwarting the purpose for which injunctive relief is sought.

WHEREFORE, Shaya requests this Court grant its motion and enter the Temporary Restraining Order and Order to Show Cause why a Preliminary Injunction Should Not Issue attached as Exhibit D (the “Proposed Order”), providing:

- A. That Defendants KYLIE NOFS, ZHU SHICAI, LUO YANBING, LIN YIN, YANG ZHENLIN, JOHN DOES NOS. 1-25, and non-parties Binance Holdings Ltd., WhiteBIT, MaskEX, BTSE, B2C2, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or

- through any trust, corporation, subsidiary, division or other device, or any of them, (collectively, the “Enjoined Parties”) are hereby temporarily restrained from withdrawing, transferring, disposing, selling, encumbering or altering any of the cryptocurrency or assets contained in the wallets listed in Appendix A of the Proposed Order;
- B. That service of the Court’s Order be effectuated through the use of a Service Token caused by Plaintiff’s counsel to be airdropped into the cryptocurrency wallet addresses identified in Appendix A of the Proposed Order;
- C. That the Court issue an Order to Show Cause why a preliminary injunction should not be issued, and set a hearing at a date and time to be determined by the Court within 14-days of its Order; and
- D. Grant any additional relief this Court deems just, fair, or appropriate.

Respectfully submitted,

ALTIOR LAW, P.C.

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Dated: March 15, 2024

CERTIFICATE OF SERVICE

I certify that on March 15, 2024, I electronically filed the forgoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record on the ECF Service List.

s/ Kenneth F. Neuman
Kenneth F. Neuman (P39429)
ALTIOR LAW, P.C.

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
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STEPHEN B. SHAYA, on behalf of
Himself and all others similarly situated,

Plaintiff,

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v.

KYLIE NOFS, ZHU SHICAI, LUO
YANBING, LIN YIN, YANG ZHENLIN,
and JOHN DOE NOS. 1-25,

Defendants.

**BRIEF IN SUPPORT OF
PLAINTIFF'S EMERGENCY MOTION FOR TEMPORARY
RESTRAINING ORDER AND FOR ORDER TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

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INTRODUCTION

This case concerns the theft of cryptocurrency using a scheme known as “pig butchering.” Using fake identities, offshore bank accounts, and legitimate and illegitimate cryptocurrency exchanges, Defendants perpetrated a scheme to convert and fraudulently obtain large sums from Plaintiff and similarly situated individuals. Defendants did so by promising and pretending to deliver substantial returns on investments, including investments in cryptocurrency. The returns are fake and only once victims have been lured to transfer large amounts of money with reports of false profits – the “fattening” – do the perpetrators and the victims’ assets disappear – the “butchering.” As in this case, the proceeds of the scheme are then transferred beyond reach through cryptocurrency channels.

Yet, through the *substantial* effort his counsel and experts, Plaintiff has identified specific cryptocurrency “wallets” in which the ill-gotten gains of Defendants’ scheme are *presently* held. Time is of the essence. At a moment’s notice Defendants are presently able to continue to transfer and obfuscate the location of the cryptocurrency proceeds of their scheme beyond Plaintiff’s knowledge and reach and without notice. It is for this reason that Plaintiff seeks immediate injunctive relief, without notice, to freeze the cryptocurrency wallets in which the proceeds of the “pig butchering” scheme are held. Anything short of such

emergency relief will leave Plaintiff and his similarly situated class members chasing ghosts, and without an adequate remedy at law.

As set forth below, Plaintiff, individually and on behalf of those similarly situated, is likely to prevail on the merits of his claims that Defendants converted, defrauded, and conspired to steal his funds and cryptocurrency. The harm that Plaintiff and the putative class members will suffer absent injunctive relief is immediate and irreparable, as the aim of Defendants scheme is to quickly and irreversibly place assets out of the reach of Plaintiff and this Court – an aim that will be accomplished without this Court’s intervention. Absent an injunction, Plaintiff will be left with no remedy, let alone an adequate one, as the Defendants are believed to be fictitious persons of unknown origin. Finally, both the public interest and balancing-of-harm factors tilt heavily toward intervening to stop an ongoing scheme and freezing assets pending a full and final disposition of the merits of this case. Simply put, absent immediate injunctive relief, Plaintiff and his similarly situated class members will be without a remedy or recourse for millions of dollars worth of cryptocurrency stolen through Defendants’ “pig butchering” scheme.

RELEVANT FACTUAL BACKGROUND

A. “Pig Butchering” Briefly Explained

“Pig butchering” is typically a scheme in which scammers promise victims returns and then fabricate evidence of positive performance on fake websites made

to look like functioning cryptocurrency trading venues or investment companies. The “butcherers” do so to entice victims to “invest” more money. When the victims have been sufficiently “fattened” with false profits, scammers steal the victims’ cryptocurrency, and cover their tracks by moving the stolen property through a maze of subsequent transactions. “Pig butchering” victims in the United States have lost billions of dollars and “pig butchering” schemes have been the subject of state and federal government investigation and prosecution.¹

B. Shaya is “Pig Butchered” by Defendants

Plaintiff, Stephen Shaya (“Shaya”), is a family practice physician living in Bloomfield Hills, Michigan. (Exh. A: Shaya Declaration, ¶2-3). Shaya is also an officer of Akkad Holdings, LLC, a family office based in Bloomfield Hills, Michigan. (*Id.*, ¶3).

On July 24, 2023, Defendant Kylie Nofs (“Nofs”) first contacted Shaya through Facebook. (Exh. A: Shaya Declaration, ¶4). Nofs appeared to have common Facebook friends with Shaya, as well as relatives in Michigan. *Id.* Nofs stated that she studied at Stanford University, lived in San Francisco, and had the U.S. telephone number +1-213-652-2560. *Id.* Nofs online presence supported the appearance that these connections and credentials were legitimate. *Id.*

¹ See FinCEN Alert of Prevalent Virtual Currency Investment Scam Commonly Known as “Pig Butchering,” U.S. Treasury Financial Crimes Enforcement Network Sep. 8, 2023, https://www.fincen.gov/sites/default/files/shared/FinCEN_Alert_Pig_Butchering_FINAL_508c.pdf.

Nofs subsequently communicated with Shaya via Telegram. (Exh. A: Shaya Declaration, ¶5). She described investing and trading in cryptocurrency, and persuaded Shaya to download the “DeFi Wallet” app through Crypto.com and to use this app to access a purported trading platform using the website Coinbitjscz.top (the “Coinbit Platform”). *Id.* On November 3, 2023, Shaya transferred \$14,000 from his account at Akkad Holdings, LLC to account number 40286331681, the recipient being Defendant Lin Yin, at Standard Chartered Bank (Hong Kong) Limited. (*Id.*, ¶6). Defendants informed Plaintiff that these transactions involved transfers of cryptocurrency through his Coinbit Platform account, with User ID (“UID”) 18177. *Id.*

Shaya thereafter engaged in what Defendants represented were cryptocurrency transactions using the Coinbit Platform. (Exh. A: Shaya Declaration, ¶6). During December 2023, Plaintiff transferred increasing amounts to accounts controlled by Defendants. *Id.* The details of Plaintiffs’ wires to accounts controlled by Defendants are set forth below, and include Shaya’s first wire transfer for \$14,000 on November 3, 2023, described above, as well as three additional international wire transfers, during December 2023, all to accounts at the receiving bank Hang Seng Bank Limited. (*Id.*, ¶7).

<u>Date</u>	<u>Amount (US\$)</u>	<u>Recipient Name</u>	<u>Account Number</u>
11/3/23	14,000.00	Lin Yin	40286331681
12/8/23	65,000.00	Yang Zhenlin	273819581888
12/12/23	146,000.00	Zhu Shicai	794648808888

12/22/23	171,621.30	Luo Yanbing	923154785888
Total	396,621.30		

(*Id.*, ¶7). Each of these wires referenced UID 18177, Shaya’s purported account on the Coinbit Platform. *Id.*

During the course of Shaya’s “investments” solicited by Defendants, Nofs represented to him that she would lend money to Shaya and invest alongside him in cryptocurrency transactions using the Coinbit Platform. (Exh. A: Shaya Declaration, ¶8). Nofs sent Plaintiff images of “confirmations” indicating that she had invested funds. *Id.*

After Shaya transferred funds to the Coinbit Platform, Defendants represented that he had earned significant profits from cryptocurrency trading, but that he would need to deposit additional funds in order to withdraw his money. (Exh. A: Shaya Declaration, ¶9). For example, Defendants communicated to Shaya that his total profit as of December 18, 2023 was more than \$3.4 million, but that he would need to pay a “handling fee” of 5 percent in order to withdraw funds. *Id.* Shaya’s final wire, on December 22, 2023, was sent in response to the request to pay this “handling fee,” as instructed by Defendants. *Id.*

On December 30, 2023, Defendants informed Shaya that his account was involved in money laundering, that his “trading account is shown as red red [sic] flag user”, and that he would need to pay an additional 10 percent “risk deposit” to

confirm that his account “is a normal account.” (Exh. A: Shaya Declaration, ¶10). Nofs subsequently informed Shaya that he would have to pay additional deposits to access his funds, and that she would lend him money to make these payments. *Id.* Through the Coinbit Platform, Defendants informed Plaintiff on December 30, 2023 and subsequently in early 2024 that this additional required deposit was 421,059.08 of USDT (USDT is a cryptocurrency traded on the ETH blockchain). *Id.*

On January 8, 2024, Defendants provided Plaintiff with account address information for him to send a test transfer of \$5 from his account at Coinbase. (Exh. A: Shaya Declaration, ¶11). Plaintiff sent these test funds, and Defendants confirmed receipt, as indicated in Plaintiff’s January 8, 2024 screenshots depicted in Shaya’s Declaration. *Id.*

C. Inca Capital Confirms the Scheme and Traces the Stolen Assets

Shaya, however, did not transfer the additional hundreds of thousands of dollars of funds demanded by Defendants to access his existing “investments.” (*Id.*, ¶12). Instead, he contacted Inca Capital (“Inca”) and Charles Zach (“Zach”) to begin an investigation of Defendants’ use of the Coinbit Platform as the common center of a scheme to lure Plaintiff and others to “invest” in cryptocurrency. *Id.* Zach and Inca have been investigating “pig butchering” schemes for over two years. (Exh. B: Zach Declaration, ¶3).

The investigation by Inca and Zach established that the Coinbit Platform is a fake cryptocurrency trading platform through which Shaya's assets were transferred, and that Defendant Nofs' identity is fake. (Exh. B: Zach Declaration, ¶¶11-13).² Inca's investigation also determined that the cryptocurrency proceeds of Shaya's and the Class Members' "investments" were part of two blockchain "clusters" controlled by Defendants; one on the Bitcoin ("BTC") blockchain and one on the Ethereum ("ETH") blockchain. (*Id.*, ¶¶8-10).³ These two BTC and ETH clusters comprise 187 "wallet" addresses, which are identified in Exhibit 1 of Zach's Declaration and Exhibit A to Plaintiff's Complaint. (Exh. B: Zach Declaration, Exh. 1).

Inca's investigation also revealed that Defendants used the fake Coinbit Platform to convert Class Members' assets, and then sent those assets through a web of transactions designed to hide their trail. (Exh. B: Zach Declaration, ¶13). Inca traced and connected Defendants' transactions, found and followed a trail of transactions, and identified the cryptocurrency wallets that held Class Members' funds. *Id.* Inca's investigation found that Class Members sent funds from accounts

² Details of the identity stolen by Nofs, including photos from various online platforms from which images were "borrowed" to perpetrate Defendants' scheme are set forth in Plaintiff's Complaint and Paragraph 12 of Zach's Declaration.

³ A "cluster" refers to a collection of wallet addresses deemed to be controlled by the same entities or users based on a clustering algorithm designed to establish the relationships among various cryptocurrency transactions. (Exh. B, ¶8).

at the following cryptocurrency exchanges: Crypto.com, Coinbase, Kraken, Robinhood, OKX, BitFlyer, Paxos, CashApp, and Binance. *Id.*

Inca’s investigation involved tracing the flow of stolen cryptocurrency using a “forward tracing” phase, a “reverse tracing” phase, and identification of a “pivot address” common to transactions involving Plaintiff’s and other Class Members’ cryptocurrency. (Exh. B: Zach Declaration, ¶¶14-15). Through this tracing, the flow of funds from Plaintiff’s investments to other cryptocurrency wallets could be traced, and Inca determined that additional addresses matched Plaintiff’s flow of funds as part of a common scheme by Defendants involving other Class Members. *Id.* The total amount of the funds and cryptocurrency was identified to be worth more than \$16 million – \$1.5 million in BTC and \$14.8 million in ETH and USDT. (*Id.*, ¶¶9-10). Based on its investigation to date, Inca has identified 200 to 250 Class Members *in addition to Plaintiff* whose cryptocurrency was involved in Defendants’ “pig butchering” scheme during the period from early November 2023 through at least February 28, 2024. (*Id.*, ¶¶5, 13-20).

A very detailed analysis of the methodology and support for Inca’s conclusions concerning tracing the location of Plaintiff’s and the putative Class Members’ assets is set forth in Paragraph 8-10 and 13-23 of Zach’s Declaration. (Exh. B: Zach Declaration). The bottom line of that analysis is that Plaintiff’s and the Class Members’ funds converted by Defendants were sent to the cryptocurrency

wallets listed in Exhibit 1 to Zach’s Declaration and Appendix A of Plaintiff’s Proposed Order attached hereto as Exhibit D. (*Id.*, ¶21).

D. Shaya Files His Complaint in This Action

On March 15, 2024, Shaya filed his Complaint in this action on behalf of himself and other similarly situated victims of Defendants’ “pig butchering” scheme. (ECF No. 1: Complaint). In it, Shaya asserts claims on behalf of himself and other putative Class Members for conversion (Count I), money had and received (Count II), fraudulent misrepresentation (Count III), and aiding and abetting/civil conspiracy (Count IV). *Id.*

ARGUMENT

I. Legal Standard

Fed. R. Civ. P. 65 permits the issuance of preliminary injunctions and temporary restraining orders. Courts must balance and consider the following four factors in determining whether to grant a preliminary injunction: 1) the likelihood of the plaintiff’s success on the merits; 2) whether plaintiff will suffer irreparable injury without the injunction; 3) the harm to others which will occur if the injunction is granted; and 4) whether the injunction would serve the public interest. *In re Delorean Motor Co.*, 755 F.2d 1223, 1228 (6th Cir.1985); *Certified Restoration Dry Cleaning Network, L.L.C. v. Tenke Corp.*, 511 F.3d 535, 542 (6th Cir. 2007). These “are factors to be balanced, not prerequisites that must be met.” *Delorean Motor*

Co., *supra*, at 1229. Therefore, “[t]hese factors simply guide the discretion of the court; they are not meant to be rigid and unbending requirements. *In re Eagle-Picher Industries, Inc.*, 963 F.2d 855, 859 (6th Cir. 1992)(citation omitted).

“The purpose of a preliminary injunction is merely to preserve the relative positions of the parties until a trial on the merits can be held.” *Univ. of Tex. v. Camenisch*, 451 U.S. 390, 395, 101 S. Ct. 1830, 1834, 68 L. Ed. 2d 175, 180 (1981). “Given this limited purpose, and given the haste that is often necessary if those positions are to be preserved, a preliminary injunction is customarily granted on the basis of procedures that are less formal and evidence that is less complete than in a trial on the merits.” *Id.*

Fed. R Civ. P. 65(b)(1) permits this Court to “issue a temporary restraining order without written or oral notice to the adverse party or its attorney,” upon a showing of “specific facts in an affidavit or a verified complaint [that] clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition; and ... the movant’s attorney certifies in writing any efforts made to give notice and the reasons why it should not be required.”

II. This Court Should Grant a Temporary Restraining Order Without Notice and Order Defendants to Show Cause Why a Preliminary Injunction Should Not Issue

A. Temporary Injunctive Relief Without Notice is Appropriate

The Declaration of Kenneth F. Neuman sets forth “the reasons why [notice] should not be required” prior to the issuance of a temporary restraining order as required by Fed. R. Civ. P. 65 (b)(1). (Exh. C: Neuman Declaration). Specifically, if the Plaintiff is required to wait until after the Defendants receive notice of this action, it is highly likely that the Defendants will transfer cryptocurrency at issue beyond the reach of discovery or recovery. (*Id.*, ¶8). Indeed, it is highly likely that notice would *precipitate* this action. *Id.* Doing so would be antithetical to the very purpose of preliminary injunctive relief – preserving the status quo pending a determination on the merits of Plaintiff’s claims. *Camenisch, supra*, 451 U.S. at 395.

Moreover, Courts have routinely granted temporary restraining orders without notice in cryptocurrency schemes, given that cryptocurrency “poses a heightened risk of asset dissipation.” *Jacobo v. Doe*, 2022 U.S. Dist. LEXIS 101504, *9 (E.D. Cal. June 7, 2022); *accord Heissenberg v. Doe*, 2021 U.S. Dist. LEXIS 257218, at *8 (S.D. Fla. Apr. 22, 2021); *accord Bullock v. Doe*, 2023 U.S. Dist. LEXIS 234778, (N.D. Iowa Nov. 3, 2023). As the Court reasoned in *Jacobo*, another pig butchering case, “[i]f defendant were provided notice of this action, ‘it would be a simple matter for [him] to transfer [the Tether] to unidentified recipients outside the traditional

banking system, including contacts in foreign countries, and effectively put it beyond the reach of this [c]ourt.” *Id.*, at *9. (Citation omitted). This is in part because cryptocurrency’s “independence from traditional custodians makes it difficult for law enforcement to trace or freeze cryptocurrencies in the event of fraud or theft[.]” *Id.* It is for these reasons that “federal district courts have granted ex parte relief in situations like this one, noting the risks that cryptocurrencies may rapidly become lost and untraceable.” *Gaponyuk v. Alferov*, 2023 U.S. Dist. LEXIS 125262, at *4 (E.D. Cal. July 20, 2023), *citing Jacobo, supra*.

For these reasons, granting a temporary restraining order without notice is not only proper, but necessary to preserve the status quo of Plaintiff and the other Class Members’ stolen assets.

B. Plaintiff and the other Class Members are Likely to Prevail on Their Claim for Conversion

Shaya is likely to prevail on the lead claim in his Complaint for conversion. To demonstrate a likelihood of success on the merits, “[a] party ... is not required to prove his case in full at a preliminary-injunction hearing.” *Camenisch, supra*, 451 U.S. at 395; *accord Certified Restoration Dry Cleaning Network, L.L.C., supra* at 542. A plaintiff “must show more than a mere possibility of success.” *Six Clinics Holding Corp. v. Cafcomp Sys., Inc.*, 119 F.3d 393, 402 (6th Cir. 1997)(citation omitted). “However, it is ordinarily sufficient if the plaintiff has raised questions going to the merits so serious, substantial, difficult, and doubtful as to make them a

fair ground for litigation and thus for more deliberate investigation." *Id.*

Under Michigan law, conversion “consists of any distinct act of domain wrongfully exerted over another's personal property in denial of or inconsistent with the rights therein.” *Dep't of Agric. v. Appletree Mktg., L.L.C.*, 485 Mich. 1, 13-14, 779 N.W.2d 237, 244 (2010). “Conversion may occur when a party properly in possession of property uses it in an improper way, for an improper purpose, or by delivering it without authorization to a third party.” *Id.*, at 244-45.

Here, Shaya’s Declaration and the well-pled allegations of his Complaint make a strong showing that Defendants converted his cryptocurrency “investments” through a series of unauthorized and unlawful transfers. As set forth above, Defendants lured Shaya to invest in cryptocurrency alongside Nofs through the fake Coinbit Platform. The corresponding cryptocurrency purchased using the \$400,000 “invested” by Shaya, was Shaya’s property to be held for his benefit in what was later revealed to be a fraudulent Coinbit Platform account. Rather than hold the cryptocurrency for Shaya’s benefit in his account, Defendants proceeded to transfer these assets through the blockchain to the wallet addresses identified in Exhibit 1 to Zach’s Declaration. In doing so, Defendants converted Shaya’s property by “us[ing] it in an improper way, for an improper purpose, or by delivering it without authorization to a third party.” *Appletree Mktg., supra*, at 244-45.

Furthermore, Shaya’s cryptocurrency is specific, identifiable property subject

to conversion. By its very nature, cryptocurrency has a unique and specific identification within the blockchain. Indeed, it is this attribute from which cryptocurrency derives its value in being specific and identifiable. It is for these reasons that Courts have held in conversion cases that “[t]he cryptocurrency assets at issue are specific, identifiable property and can be traced in JOHN DOE's assets in the Destination Addresses or elsewhere.” *Astrove v. Doe*, 2022 U.S. Dist. LEXIS 129286, at *6-7 (S.D. Fla. Apr. 22, 2022) (Granting *ex parte* temporary restraining order in a cryptocurrency scheme, finding that the “[p]laintiff has shown a strong likelihood of success on the merits of his claims,” including a claim for conversion); *accord Blum v. Defendant*, 2023 U.S. Dist. LEXIS 235592, at *4-5 (N.D. Fla. Dec. 13, 2023) (Granting an *ex parte* temporary restraining order holding that, “Blum's cryptocurrency assets are specific, identifiable property that can be traced to Defendants' Destination Addresses.”).

For each of these reasons, and the well-pled allegations set forth in Shaya's Complaint, there is a strong likelihood that Shaya and other similarly situated Class Members will prevail on their claim for conversion.

C. Plaintiff and Similarly Situated Class Members are Likely to Suffer Irreparable Injury if a Temporary Restraining Order and Injunction is not Issued

Courts have repeatedly held that cryptocurrency theft schemes threaten imminent and irreparable loss absent injunctive relief. As the court in *Jacobo* noted,

“district courts have found that the risk of irreparable harm to be likely in matters concerning fraudulent transfers of cryptocurrency due to the risk of anonymous and speedy asset dissipation.” *Jacobo, supra* at *15-16, *citing Heissenberg v. Doe*, 2021 U.S. Dist. LEXIS 257218, at *2 (S.D. Fla. Apr. 23, 2021). This is in part because "it would be a simple matter for [defendant] to transfer. . . cryptocurrency to unidentified recipients outside the traditional banking system" and effectively place the assets at issue in this matter beyond the reach of the court[.]” *Id.* Courts have similarly held that a money judgment is an *inadequate* legal remedy based both on the anonymity of the defendants at the heart of the scheme, as well as the difficulty in having to trace transfer of cryptocurrency. As the Court reasoned in *Bullock v Doe*, “defendants will likely convert the crypto to a place where plaintiff can no longer find it or find defendants themselves.” *Bullock v. Doe*, 2023 U.S. Dist. LEXIS 234778, at *16 (N.D. Iowa Nov. 3, 2023). Thus, “plaintiff in fact likely does not have an adequate legal remedy, because a money damages judgment would be essentially meaningless.” *Id.*

The same is true here. Defendants’ identities are either unknown or fake. As in *Bullock*, a money judgment against them is meaningless. Absent an injunction, Defendants can be expected to continue to transfer Shaya and the other Class Members’ cryptocurrency beyond the reach of discovery and this Court. It is for this reason that Courts have held in similar schemes that, “[p]laintiff has good reason to

believe the Defendant will hide or transfer his ill-gotten gains beyond the jurisdiction of this Court unless those assets are restrained.” *Heissenberg, supra*, at *8. This Court should be left with no comfort that this case will be any different. Simply put, absent an injunction Plaintiff and the other Class Members will be left with no adequate legal remedy.

D. No Substantial Harm to Others Will Occur

The injunction sought by Shaya is a temporary one, subject to an extension only after a hearing on a preliminary injunction. Even if Defendants could claim a legal right to the stolen cryptocurrency, the freeze of such assets is but a temporary inconvenience. Counterbalanced against this inconvenience, is the harm to Plaintiff and the other Class Members if an injunction does not issue. Namely, that Plaintiff and the other Class Members cryptocurrency will be forever gone and leave them with no adequate remedy for their loss. As the Court in *Jacobo* held, balancing of these harms favors Plaintiff: “A delay in defendant's ability to transfer the assets only minimally prejudices defendant, whereas withholding injunctive relief would severely prejudice plaintiff by providing defendant time to transfer the allegedly purloined assets into other accounts beyond the reach of this court.” *Jacobo, supra*, at *17. Consequently, the balancing of the harm to Plaintiff and the “pig butchering” Defendants favors injunctive relief.

E. An Injunction Serves the Public Interest

Finally, the injunction sought by Shaya serves the public interest. As the *Jacobo* court held, “the public interest is properly served by promoting the objectives of . . . FinCEN and providing assurance to the public that courts will take action to promote protection of assets and recovery of stolen assets when they can be readily located and traced to specific locations.” *Jacobo, supra*, at *18, quoting *Heissenberg, supra*, at *2 (Internal quotations omitted). Likewise, “entering a TRO favors the public interest because . . . [f]reezing [] cryptocurrency accounts reassures the public that even with transactions conducted in the cryptocurrency space, there is an adequate remedy at law to prevent fraud or theft.” *Blum, supra*, at *5, quoting *Hikmatullaev v. Marco Alessandro Villa*, 2023 U.S. Dist. LEXIS 111619, at *8 (S.D. Fla. June 28, 2023).

The same is true here. Freezing the wallet addresses to which Plaintiff and other Class Members’ cryptocurrency has been traced serves the public interest by affording the possibility of a remedy pending a hearing on the merits of the claims in this case. No public interest would be served by continuing to permit Defendants to transfer and dissipate stolen assets in furtherance of their scheme.

III. No Bond Should be Required by Plaintiff

Fed. R. Civ. P. 65 (c) provides that an injunction should be issued only if a “movant gives security in an amount that the court considers proper to pay the costs

and damages sustained by any party found to have been wrongfully enjoined or restrained.” As courts have observed in other cryptocurrency theft cases, “District courts may set the bond at zero if there is no evidence the party will suffer damages from the injunction.” *Gaponyuk v. Alferov*, 2023 U.S. Dist. LEXIS 125262, at *8 (E.D. Cal. July 20, 2023); *accord, Jacobo, supra*, at *18. Such cases where a zero-bond is appropriate include cryptocurrency schemes where, “there is no evidence before the court demonstrating that defendant will suffer any damages as a result of the requested temporary restraining order.” *Jacobo, supra*, at *18.

Here, the injunction sought simply seeks a freeze of stolen cryptocurrency in the traced wallet addresses. Defendants have no right to this stolen property and, consequently, will sustain no damages if they are restrained from further transfer of these assets. As in *Jacobo*, Plaintiff requests that no bond be required to enjoin the transfer of assets stolen from him.

CONCLUSION

For all of the foregoing reasons, Plaintiff Stephen Shaya requests this Court grant his Motion and enter the proposed Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Issue in the form attached as Exhibit D.

Respectfully submitted,

ALTIOR LAW, P.C.

/s/ Kenneth F. Neuman
Kenneth F. Neuman (P39429)
Matthew D. Smith (P72969)
Attorneys for Plaintiff
401 S. Old Woodward, Suite 460
Birmingham, MI 48009
(248) 594-5252
kneuman@altiorlaw.com
msmith@altiorlaw.com

Dated: March 15, 2024

CERTIFICATE OF SERVICE

I certify that on March 15, 2024, I electronically filed the forgoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record on the ECF Service List.

s/ Kenneth F. Neuman
Kenneth F. Neuman (P39429)

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

STEPHEN B. SHAYA, on behalf of
Himself and all others similarly situated,

Plaintiff,

Case No. 24-cv-10670

Hon. Mark A. Goldsmith

v.

KYLIE NOFS, ZHU SHICAI, LUO
YANBING, LIN YIN, YANG ZHENLIN,
and JOHN DOE NOS. 1-25,

Defendants.

INDEX OF EXHIBITS

Exhibit A: Declaration of Stephen B. Shaya

Exhibit B: Declaration of Charles Zach

Exhibit C: Declaration of Kenneth F. Neuman

Exhibit D: [Proposed] Order to Show Cause and Temporary Restraining Order

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

STEPHEN B. SHAYA, on behalf of himself
and all others similarly situated,

Plaintiff,

-against-

KYLIE NOFS, ZHU SHICAI, LUO
YANBING, LIN YIN, YANG ZHENLIN,
and JOHN DOE NOS. 1-25,

Defendants.

DECLARATION OF STEPHEN B. SHAYA

I, Stephen B. Shaya, declare under penalty of perjury as follows:

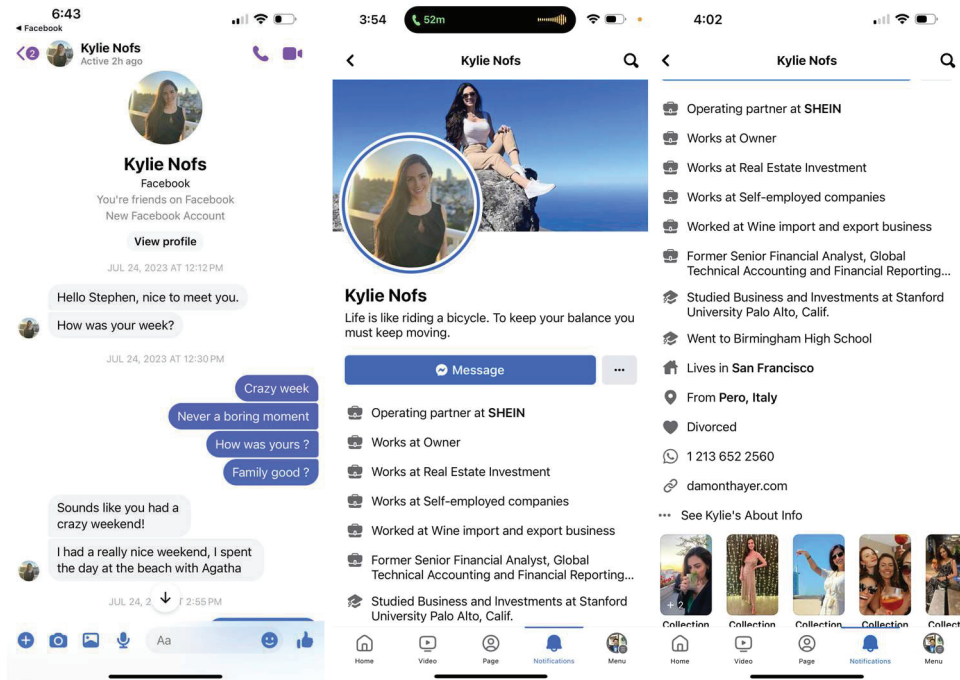
1. I am Stephen B. Shaya, over 18 years of age, of sound mind and otherwise competent to make this Declaration. The evidence set forth here is based on my personal knowledge. I submit this Declaration in support of the above-captioned Complaint and Proposed Order to Show Cause and Temporary Restraining Order.

2. I live and reside in Bloomfield Hills, Michigan.

3. I am a family practice physician in Michigan and an officer of J&B Medical, a global health care solutions company, based in Wixom, Michigan. I also

am an officer of Akkad Holdings, LLC, a family office based in Bloomfield Hills, Michigan.

4. A person representing themselves to be Kylie Nofs (“Nofs”) first contacted me through Facebook on July 24, 2023. Nofs appeared to have common Facebook friends with me, as well as relatives in Michigan. Nofs stated that she studied at Stanford University, lived in San Francisco, and had the U.S. telephone number +1-213-652-2560. The following are screenshots from my phone taken by me:



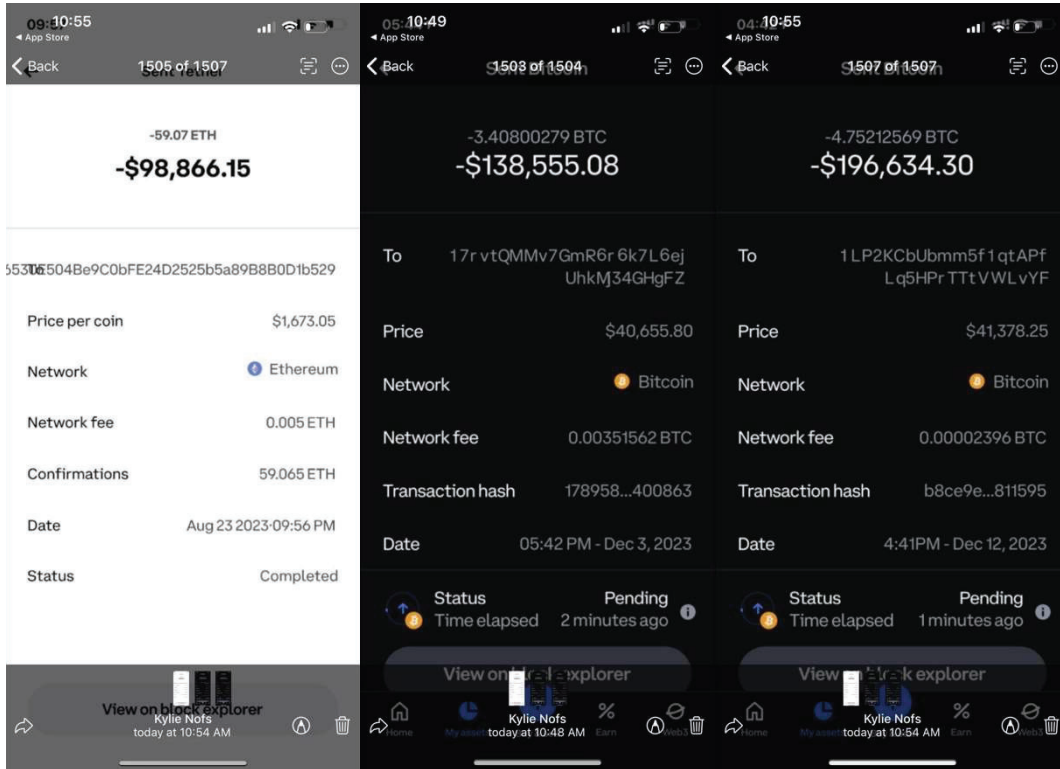
5. Nofs subsequently communicated with me via Telegram. She described investing and trading in cryptocurrency, and persuaded me to download the “DeFi Wallet” app through Crypto.com and to use this app to access the Coinbit Platform using the website Coinbitjscz.top.

6. On November 3, 2023, I transferred \$14,000 from my account at Akkad Holdings, LLC to account number 40286331681, recipient Lin Yin, at Standard Chartered Bank (Hong Kong) Limited. Defendants informed me that these transactions involved transfers of cryptocurrency through his account, with User ID (“UID”) 18177. I thereafter engaged in what Defendants represented were cryptocurrency transactions using the Coinbit Platform. During December 2023, I transferred increasing amounts to accounts controlled by Defendants. In aggregate, I transferred a total nearly \$400,000.

7. The details of my wires to accounts controlled by Defendants are set forth below. As noted above, my first wire transfer, for \$14,000 was on November 3, 2023, to an account at the receiving bank Standard Chartered Bank (Hong Kong) Limited. I made three additional international wire transfers, during December 2023, all to accounts at the receiving bank Hang Seng Bank Limited. These wires referenced UID 18177, my purported account on the Coinbit Platform. All of the above wires were sent from Akkad Holdings, LLC.

<u>Date</u>	<u>Amount (US\$)</u>	<u>Recipient Name</u>	<u>Account Number</u>
11/3/23	14,000.00	Lin Yin	40286331681
12/8/23	65,000.00	Yang Zhenlin	273819581888
12/12/23	146,000.00	Zhu Shicai	794648808888
12/22/23	171,621.30	Luo Yanbing	923154785888
Total	396,621.30		

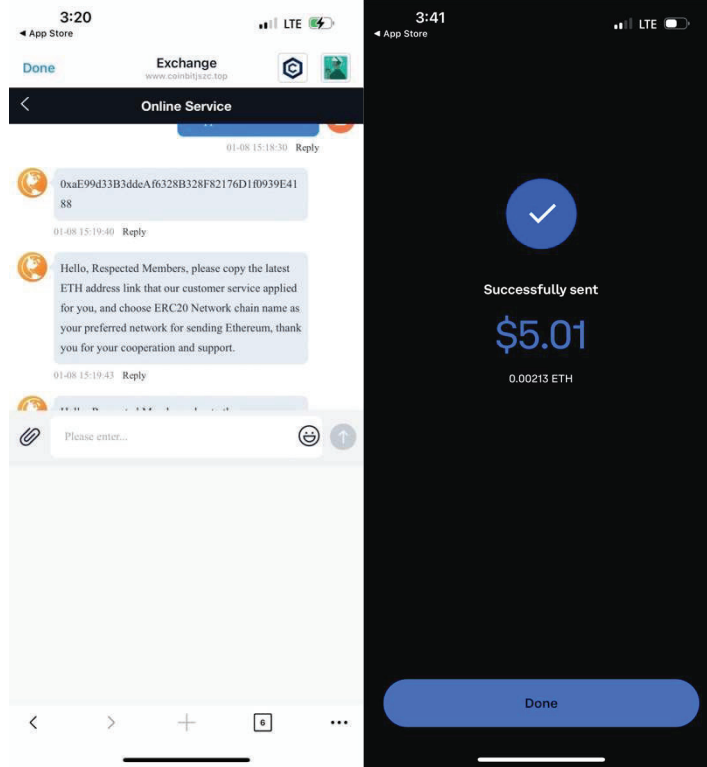
8. Nofs represented to me that she would lend money to me and investigate alongside me in cryptocurrency transactions using the Coinbit Platform. Nofs sent me “confirmations” indicating that she had invested funds. The following are screenshots from my phone taken by me:



9. After I transferred funds to the Coinbit Platform, Defendants represented that I had earned significant profits from cryptocurrency trading, but that I would need to deposit additional funds in order to withdraw my money. For example, Defendants communicated to me that my total profit as of December 18, 2023 was more than \$3.4 million, but that I would need to pay a “handling fee” of 5 percent in order to withdraw funds. My final wire, on December 22, 2023, was sent in response to the request to pay this “handling fee,” as instructed by Defendants.

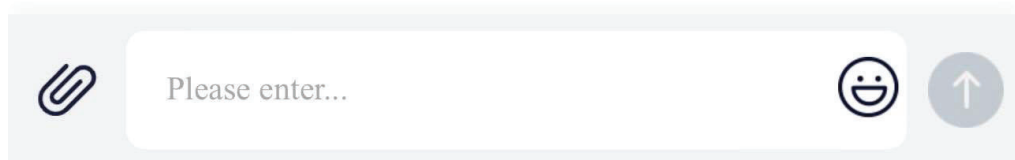
10. On December 30, 2023, Defendants informed me that my account was involved in money laundering, that my “trading account is shown as red red [sic] flag user”, and that I would need to pay an additional 10 percent “risk deposit” to confirm that my account “is a normal account.” Nofs subsequently informed me that I would have to pay additional deposits to access his funds, and that she would lend me money to make these payments. Through the Coinbit Platform, Defendants informed me on December 30, 2023 and subsequently in early 2024 that this additional required deposit was 421,059.08 of USDT (USDT is a cryptocurrency traded on the ETH blockchain).

11. On January 8, 2024, Defendants provided me with account address information for me to send a test transfer of \$5 from his account at Coinbase. I sent these funds, and Defendants confirmed receipt, as indicated in the January 8, 2024 screenshots below, which I took from my phone:



Hello, dear user 18177. After inquiry, you need to pay a risk deposit of 421,059.08 USDT. Our company received your ETH worth 4.92 USDT on January 8th today. You also need to pay a risk deposit of 421,054.16 USDT to restore your account. The deadline is before 00:00 on January 20. Extra fees will be incurred if you exceed the deadline. Please be sure to pay all funds within the specified time. Also wish you a happy life!

01-08 16:05:47 Reply



12. I did not transfer the additional hundreds of thousands of dollars of funds that Defendants requested. Instead, I contacted Inca Digital (“Inca”), a cryptocurrency investigation firm, which traced my transactions and confirmed that Defendants were orchestrating a “pig butchering” scheme.

13. 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 Declaration in support of my request for emergency relief by order to show cause for a preliminary injunction, and a temporary restraining order pending the hearing on the preliminary injunction.

I, Stephen B. Shaya, declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:

Stephen B Shaya

9D3CB6F94869446...

Stephen B. Shaya

Dated: March 14, 2024

EXHIBIT B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

STEPHEN B. SHAYA, on behalf of himself
and all others similarly situated,

Plaintiff,

-against-

KYLIE NOFS, ZHU SHICAI, LUO
YANBING, LIN YIN, YANG ZHENLIN,
and JOHN DOE NOS. 1-25,

Defendants.

DECLARATION OF CHARLES ZACH

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

1. I am an employee at Inca Digital, a company that investigates cryptocurrency schemes, including “pig butchering.” As part of my employment at Inca Digital, I have investigated matters related to Stephen Shaya’s (“Plaintiff”) 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. Inca Digital is a digital asset intelligence company that provides data, analytics, and expertise to many of the world's leading exchanges, financial institutions, regulators, and government agencies. Inca Digital's clients use its unique

and comprehensive intelligence to surveil digital asset markets, fight crime, generate alpha, and more. For more information about Inca Digital and our work, please visit: <https://inca.digital/>.

3. Inca Digital has been investigating ‘pig butchering’ cases for over two years. “Pig butchering” victims in the United States have lost billions of dollars and “pig butchering” schemes have been the subject of state and federal government investigation and prosecution.¹ Based on my expertise and experience, this is a clear case of “pig butchering.”

4. The scheme is centered around a fake cryptocurrency trading platform composed of several websites that use the phrase “Coinbit,” including Coinbitjscz.top, Coinbitkgtf.top, and Coinbitqodf.com (collectively, “Coinbit” or the “Coinbit Platform”). Defendants used the Coinbit Platform to lure a common class of victims (“Class Members,” or the “Class”) to transfer funds to cryptocurrency wallets controlled by Defendants. This class action is brought to freeze wallets containing Class Member funds that Defendants converted, and return these funds to Class Member victims.

¹ See FinCEN Alert of Prevalent Virtual Currency Investment Scam Commonly Known as “Pig Butchering,” U.S. Treasury Financial Crimes Enforcement Network Sep. 8, 2023, https://www.fincen.gov/sites/default/files/shared/FinCEN_Alert_Pig_Butchering_FINAL_508c.pdf.

5. Based on Inca's investigation to date, Defendants conversion scheme involved transactions during the period from early November 2023 through at least February 28, 2024, included approximately 200 to 250 Class Member victims, and involved the conversion by Defendants of approximately \$16 million of Class Member funds.

6. To date, the investigation has identified the wallet addresses set forth in Exhibit 1 to this Declaration as part of the common "pig butchering" allegations centered around the Coinbit Platform.

7. The investigation Inca established that Coinbit is a fake cryptocurrency trading platform and Defendant Nofs is a fake identity. The "results" and "statements" provided to Class Members that purported to be from the Coinbit Platform were false.

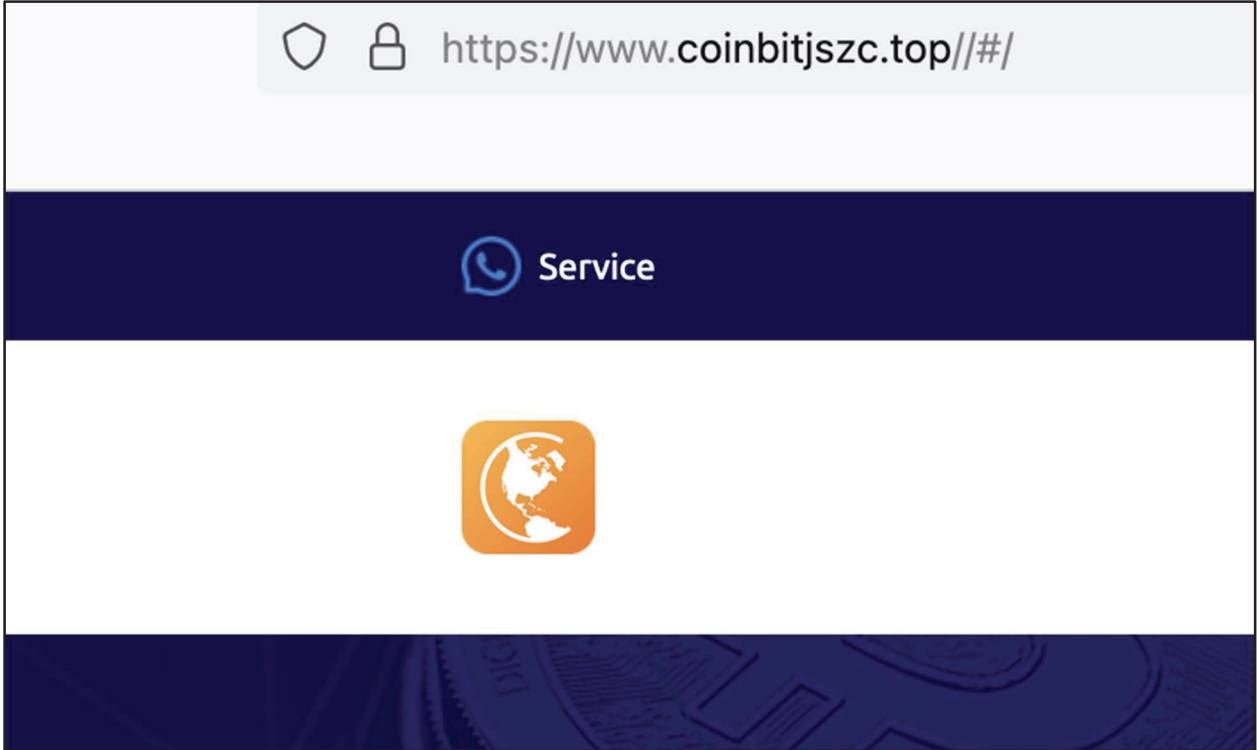
8. Inca's investigation determined that Class Member transactions were part of two "clusters" controlled by Defendants, one on the BTC blockchain and one on the ETH blockchain. A "cluster" refers to a collection of wallet addresses deemed to be controlled by the same entities or users based on a clustering algorithm designed to establish the relationships among various cryptocurrency transactions.

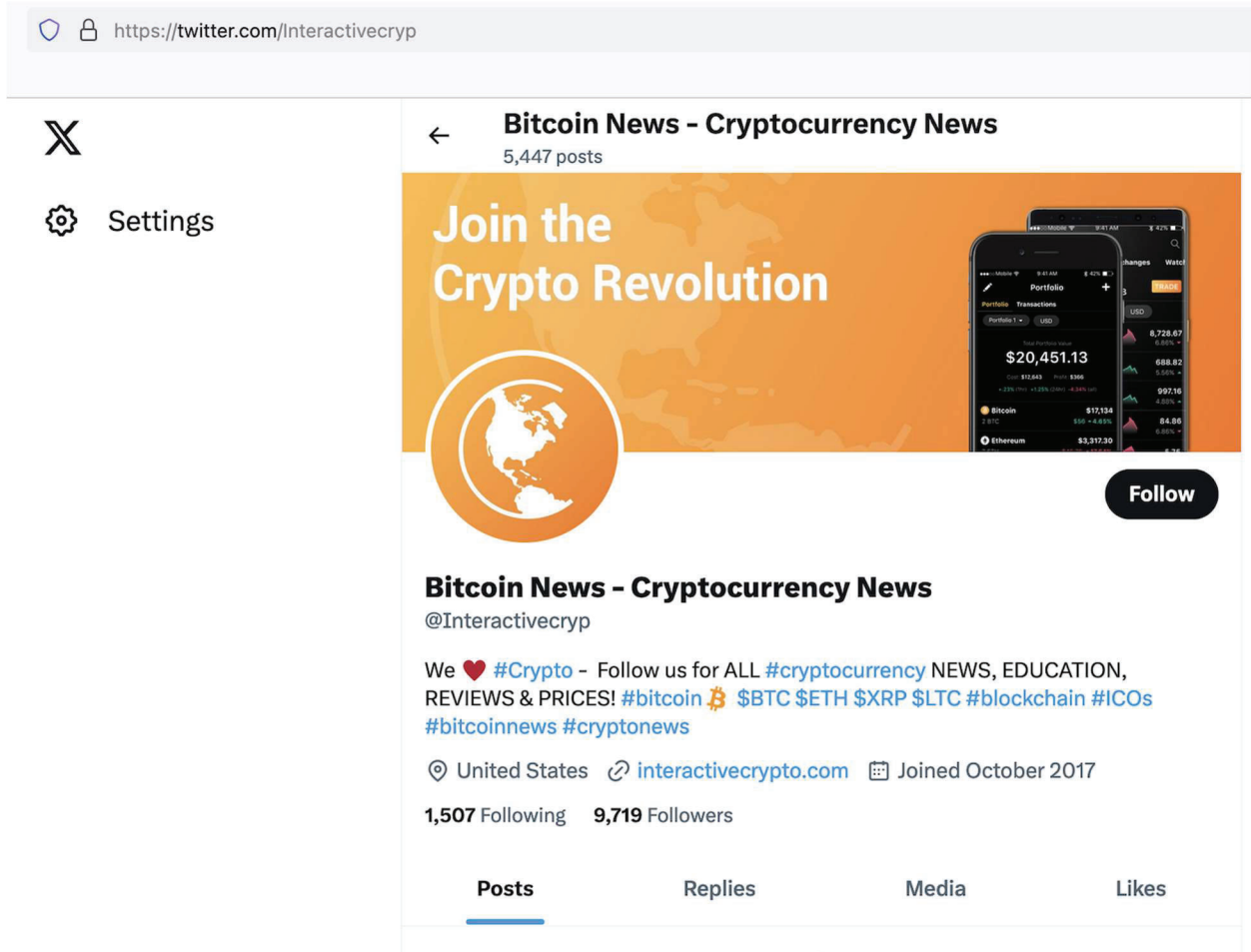
9. With respect to BTC, Inca determined that Plaintiff's BTC transactions sent to bitcoin address 1KNcYeWbmKJtFXTNDL7PNdohm4s7D6rfn1 were part of cluster address 19PDCExbTskJMk6DC4m7ffsybYNThnCxyE (the "BTC Cluster"),

and included 11 wallet addresses controlled by Defendants, set forth in Exhibit 1 to this Declaration. The BTC Cluster received 96 transactions totaling approximately 35 BTC between January 4, 2024 and February 22, 2024. This amount of BTC was worth approximately \$1.5 million during this time.

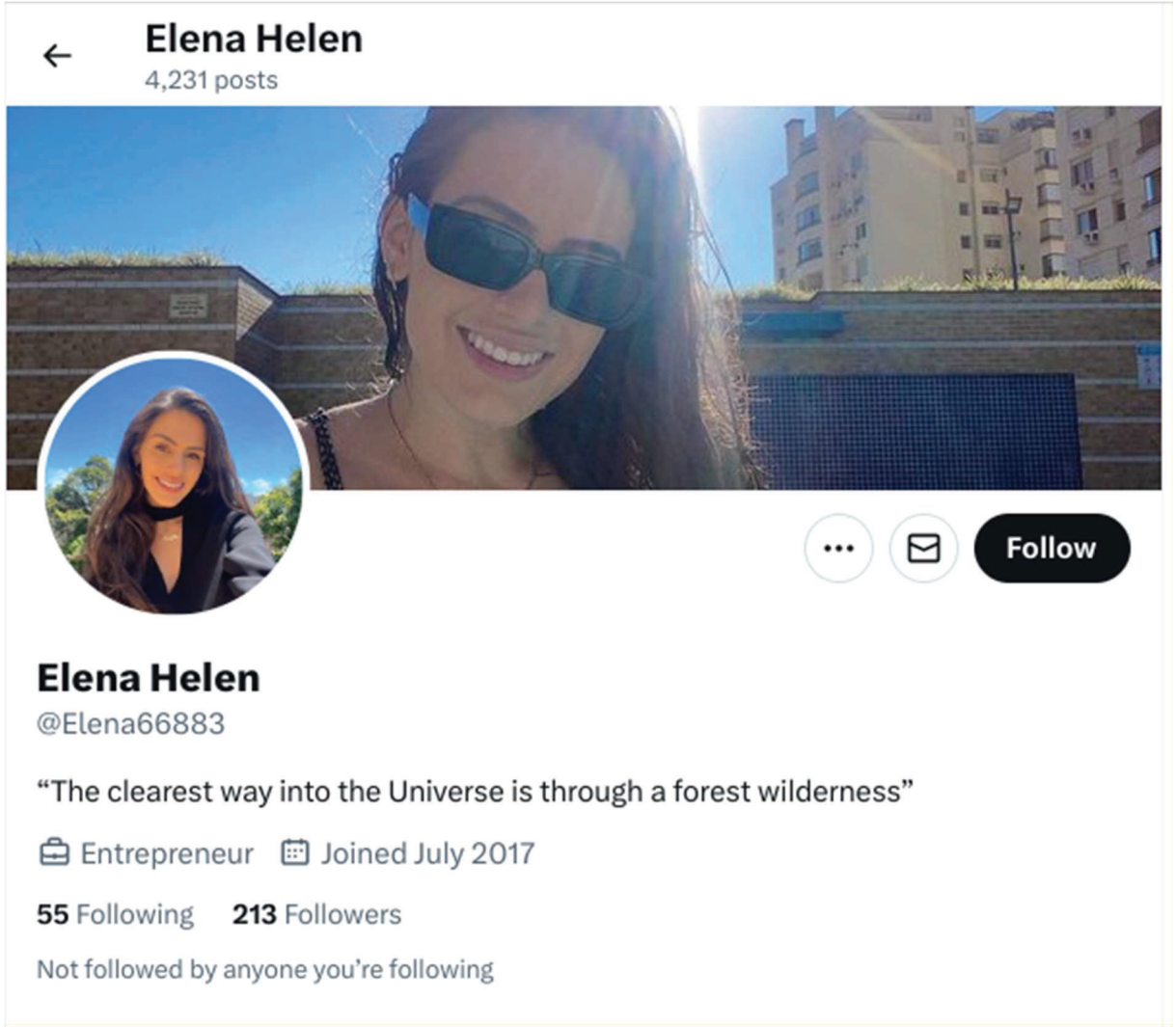
10. With respect to ETH, Inca determined that Plaintiff's ETH transactions sent to ETH address 0xaE99d33B3ddeAf6328B328F82176D1f0939E4188 were part of cluster address 0xf99218cac4d4a1b6bf334d55152937240bafd8a0 (the "ETH Cluster"), which included 176 wallet addresses controlled by Defendants, also set forth in Exhibit A. The ETH Cluster received 935 transactions totaling approximately 6,100 ETH and approximately 1.4 million USDT between November 4, 2023 and January 14, 2024. This amount of ETH and USDT was worth an estimated \$14.8 million during this time.

11. In addition, the investigation established that the Coinbit Platform was fake. The website www.coinbitjszc.top has a logo that is taken from a separate website, interactivecrypto.com. There are no statements or indications that either site is related. Note that the screenshots below, from (1) www.coinbitjszc.top, (2) interactivecrypto.com, and (3) the Twitter/X page of interactivecrypto.com have near-identical logos:





12. The investigation also revealed that Nofs was a fake identity. Reverse image searches of images sent by Nofs to Plaintiff established that the same photos were used widely across various social media platforms, including two different Twitter accounts, two different LinkedIn accounts, and various Russian language dating app accounts. Examples of these photos are set forth below, with captions indicating the sources of the photos.



The image is a screenshot of a Twitter profile page for a user named Elena Helen. At the top left, there is a back arrow icon. The name "Elena Helen" is displayed in bold black text, with "4,231 posts" underneath it. Below the name is a large rectangular profile picture showing a woman with long dark hair wearing sunglasses and smiling, with a brick wall and a building in the background. To the left of this large image is a smaller circular profile picture of the same woman. To the right of the circular image are three icons: a three-dot menu, an envelope icon for direct messages, and a black "Follow" button. Below the profile pictures, the name "Elena Helen" is repeated in bold, followed by the handle "@Elena66883". A quote is displayed: "The clearest way into the Universe is through a forest wilderness". Below the quote, it says "Entrepreneur" with a briefcase icon and "Joined July 2017" with a calendar icon. At the bottom, it shows "55 Following" and "213 Followers", and a note that says "Not followed by anyone you're following".

(Twitter profile “Elena Helen”)



(Photo received from “Nofs”)



The image shows an Instagram profile for La Perla Jeanne. At the top is a large close-up photo of a cat's face. Below it is a circular profile picture of a woman with long brown hair. To the right of the profile picture is a three-dot menu icon and a black 'Follow' button. The name 'La Perla Jeanne' is displayed in bold, with the handle '@LaPerlaJeanne' below it. The bio reads: 'I enjoy my life, I'm a dermatologist, internal medicine, gynecologist, hobbies, golf, skiing, horseback riding, being a romantic woman'. Below the bio, it shows 'Los Angeles' with a location pin icon and 'Joined July 2012' with a calendar icon. At the bottom, it says '9,487 Following' and '13.3K Followers', followed by 'Not followed by anyone you're following'.

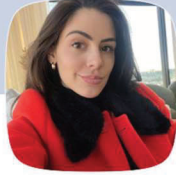


The image shows a Twitter post from the user 'La Perla Jeanne @LaPerlaJeanne' posted 20 hours ago. The tweet text is 'God will not favor you because you are weak.#happy'. Below the text are two side-by-side photos of the same woman from the profile picture, wearing a bright pink top and smiling. At the bottom of the tweet are icons for replies (1), retweets, likes (2), views (86), and a share icon.

(Twitter profile “La Perla Jeanne”)



(Photo received from “Nofs”)



Eileen Thomas Basic

[See whole profile](#)



forscht zu einem Thema.

Partnerin / Gesellschafterin, Präsident für Operations, Pure Health consultancy

[Log in now to view all entries.](#) →

Skills [Log in now to view their full profile.](#) →

- Interimsmanagement
- Kraft
- Mergers & Acquisitions
- Technologie
- Branding
- Werbung
- Produkt
- Coaching

Timeline

Professional experience for Eileen Thomas

Current 8 years and 6 months, since Sep 2015

Präsident für Operations
Pure Health consultancy

(Resume website profile for “Eileen Thomas”)



(Photo received from “Nofs”)

AbcAnanas.pro Encounters Search Sign in Sign up

Bella, 34
From Moscow

Wink Message Add to Favourites


Give her a compliment
Attract more attention to your profile

Interested in: Guy
Age: 40 - 60
Goal: flirt and dating
Languages: Русский
Russian Federation

(Russian Dating Profile)

5:56

LTE

<  **Kylie Nofs** is in **Tucson, AZ.** 5h · 🌐

The most precious thing for man is life, and life is only once for man. A person's life should be spent like this: when he looks back on the past, he will not feel regret for wasting his years by doing nothing, nor will he feel guilty for being despicable and living a mediocre life. The most precious thing for man is life, and life is only once for man. A person's life should be spent like this: when he looks back on the past, he will not feel regret for wasting his years by doing nothing, nor will he feel guilty for being despicable and living a mediocre life. --Ostrovsky



Comment as Stephen Shaya



(Photo on “Nofs” Facebook Page)

13. Inca's investigation also revealed that Defendants used the fake Coinbit Platform to convert Class Members' assets, and then sent those assets through a web of transactions designed to hide their trail. Inca was traced and connected Defendants' transactions, found and followed a trail of transactions, and identified the cryptocurrency wallets that held Class Members' funds. Inca's investigation found that Class Members sent funds from accounts at the following cryptocurrency exchanges: Crypto.com, Coinbase, Kraken, Robinhood, OKX, BitFlyer, Paxos, CashApp, and Binance.

14. Inca's investigation involved two phases, each of which is precise, reliable, and replicable. In phase one, Inca "forward traced" the flow of funds from Plaintiff's investment to other cryptocurrency wallets. Inca traced Plaintiff's transactions forward to one BTC Blockchain wallet and one ETH Blockchain wallet, each of which were involved in transactions originating with Class Member wallets. Inca also traced Plaintiff's transactions to a "Pivot Address," 0x32c6Ffd39e5FdD2e1c0a56307fD62dB45Cddf9f8, on the ETH Blockchain and found that this Pivot Address was common to transactions with other Class Member wallets.

15. In phase two, Inca "reversed traced" the flow of funds to the above addresses and determined that additional addresses matched Plaintiff's flow of funds

as part of a common scheme involving other Class Members. Through this tracing, Inca was able to confirm the identity of wallets involved in cryptocurrency transactions that were part of the common scheme, including the identity of Defendants' wallets that received Class Member funds and accordingly should be frozen. A summary of Inca's analysis is set forth below, separated into the analysis of the Defendants' conversion of assets using (1) the BTC Blockchain, and (2) the ETH Blockchain.

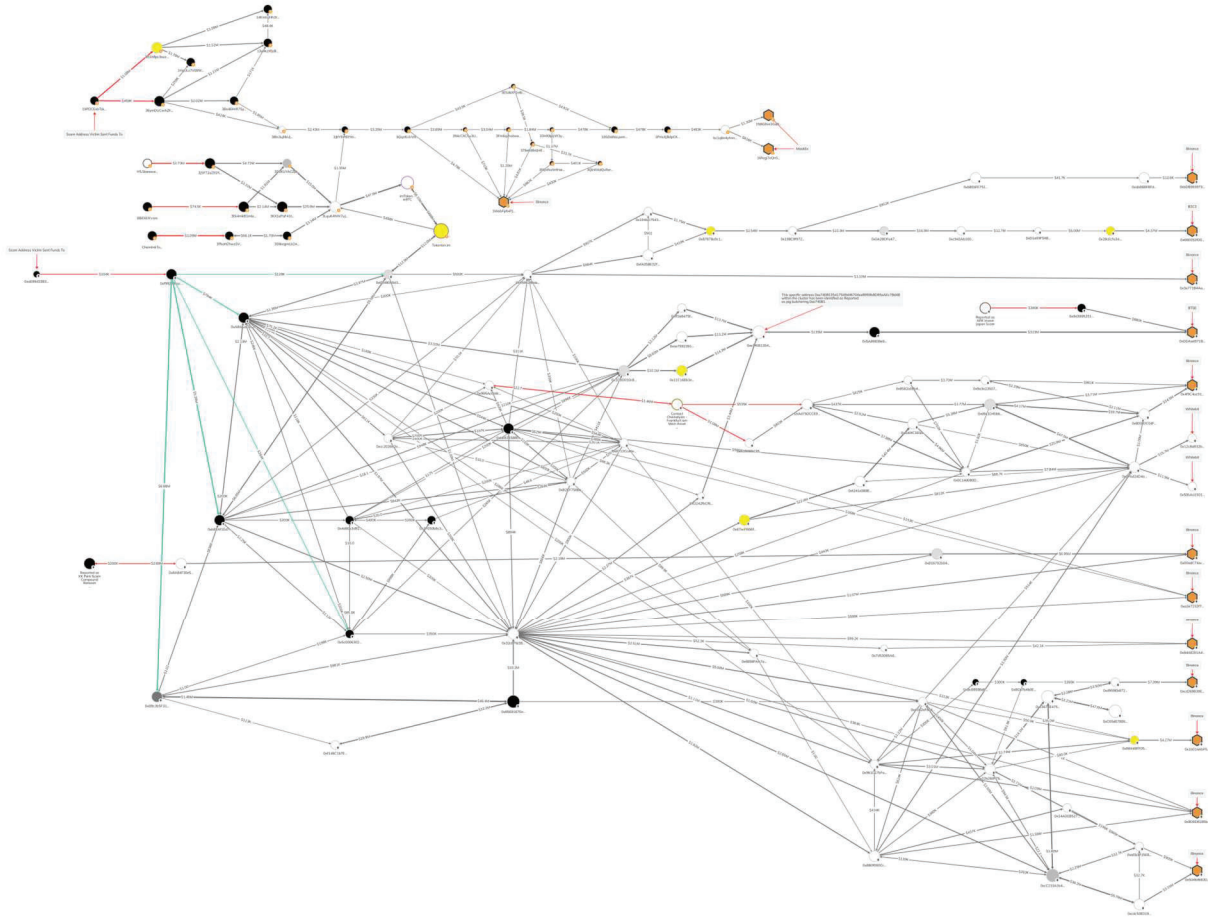
16. First, Plaintiff's BTC was transferred through four levels of transactions, commingled with other Class Member funds along the way, until a portion of Plaintiff's BTC reached BTC address 3QqzKLErVtrdVhXkgJb6hEmb8JdswyJKoA as part of transaction 5d1fbb054c4b3643e16d45e3732150759df2e23839a9e5483b1a6597c55426c9, which amounted to 78.9996 BTC. From this address, Defendants used what is known as a "peel chain" technique² to separate this BTC into smaller amounts at the same exchange address. Approximately 69 BTC of this 78.9996 BTC was deposited to Binance address 1MiobFphxPJU4WiKahfBo2MaZQEvfpnzHp through six transactions. The remaining 9.9 BTC was split and deposited in addresses 15BG9ze2GaB6ZZrHxcsXEWJew9K4bNPE5X and 16fogJ7eQnSkaB7HXshjgWKG5g2XDYuZWk at the exchange MaskEx.

² See <https://www.fraudinvestigation.net/cryptocurrency/tracing/peel-chain>.

17. Portions of Plaintiff's and other Class Member funds were sent to addresses 14KmbiJHh3rS6b1XVrPQFrRCvBZZv9XLSq, 13y9kzXfjsBpo8R81hRTbUCtunra9vDjdk, and 1HqULv7zS9WWmuc3FkPT2pNorjxJL2hCti, from which they were deposited to Binance. A new deposit address was generated for each new deposit to Binance, with amounts typically of a "round" 1 or 2 BTC.

18. According to Inca's investigation, the network of addresses leading to the Binance and MaskEx deposit addresses are associated with entities known among experts in the cryptocurrency community to be "scam entities." This network is set forth in the detailed "tracing graph" below. On the left side of the tracing graph are the wallet addresses that received funds from Plaintiff. Funds then moved from left-to-right, ultimately arriving at the wallet addresses on the right side of the tracing graph. The yellow nodes in the tracing graph represent "scam entities," identified as "WealthFrontExchange.com", "H5.Starexcer.com", "BBEXEIY.com", and "ChainlinkTow.com". These entities have transaction histories that are similar to those in the Coinbit Platform.

"Tracing Graph"



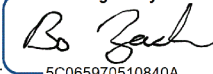
19. According to Inca's analysis of the ETH Blockchain, Plaintiff's ETH was transferred to address `0xf99218cac4d4a1b6bf334d55152937240bafd8a0`, and then were split. Portions of Plaintiff's ETH were traced to the Binance deposit addresses `0xbDB99397306D5Ed439A866a1196C2878fFD30af0` and `0x3e771B4Aae63A8Ff4D6e748b217a478C9e3fD0Fc`. Additional portions were traced to address `0xDDAad971BE05321FD541372CD710a7f0555972eD` of BTSE and `0x66E092fD00c4E4eb5BD20F5392C1902d738aE7bC` of B2C2. According to

Inca, the above addresses represent “omnibus” funds held by BTSE and B2C2 exchange users, meaning that they include not only Class Member funds but other funds. Due to a lack of adequate address attribution data, direct input from the exchanges is necessary to determine at which address Class Member funds entered the respective exchanges.

20. Portions of Class Member funds were sent to five different addresses before arriving at ETH address 0x32c6Ffd39e5FdD2e1c0a56307fD62dB45CddF9f8, which Inca determined to be a “pivot address.” According to Inca, this pivot address used decentralized exchanges such as Tokenlon, BKSwap, linch, and Uniswap to swap stolen cryptocurrency for other cryptocurrency, most notably USDT. From this pivot address, funds were routed to various exchange deposit addresses. The tracing graph below annotates Binance deposit addresses of interest that have been active in the past month, as well as an additional two addresses presumed to be deposit addresses at Whitebit, a European based exchange registered in Lithuania and the United Kingdom.

21. The bottom line of Inca’s analysis is that Class Members’ funds converted by Defendants were sent to the cryptocurrency wallets listed in Exhibit 1 to this Declaration.

I, Charles Zach, declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:

5C065970510840A...

Charles Zach

Dated: March 14, 2024

Exhibit 1 to Declaration of Charles Zach

Cryptocurrency Addresses (categorized by exchange)

Binance

- 1MiobFphxPJU4WiKahfBo2MaZQEvfpnzHp
- 0x3e771B4Aae63A8Ff4D6e748b217a478C9e3fD0Fc
- 0xbDB99397306D5Ed439A866a1196C2878fFD30af0
- 0x00adC74eca60bc8570fBfbf2Ae0001bdBA9987d1
- 0xa3e7232f754c25dB48E7B1e45935830c987E81B0
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- 0xcd269B39EA2855242258F90089cc76e6f10504Ab
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- 1EWgCTg17DaCHGGQf5ZZ3BV52CFKkF4vE9
- 1EYQ9uvqeGmRg41Yea42yigWoAKqftB9ik
- 1F73oPbsSb2sShxQQbbXY6F1vEQWMfYAwY
- 1FfjgorWHSPc4jgK2HKKHXMNCQHGMRWMYZ
- 1MNMBRsVK2oLzQ2TsTwQHm4uHwz6JyxQLx
- 1MUQ7KWARGTTtysgxjxgiL1vk7r3RgYDjY
- 1MVSf7yLxBNJTHqRJxkMj3UscSpVsBW8fJ

- 1N1DEHhgk5nVV2smaeu2RPPKJ671EE7CE7d
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- 1FrDNEu54dwhyBtwoahxJLcvigT5CbbYzm
- 1FVPV1LYkZt3zuRUTtc7GHB3zRMnLSVyUS
- 1HPZd5ARUsmZXLqzooSAbiT69oka4HVxxh

Whitebit

- 0x12c8aB32bfC3b5da73d987073EB854d212909c85
- 0x50bAa1501fa610d79269c50fBcd52eFE46C80d80

MaskEx

- 15BG9ze2GaB6ZZrHxcsXEWJew9K4bNPE5X
- 16fogJ7eQnSkaB7HXshjgWKG5g2XDYuZWk

BTSE

- 0xDDAad971BE05321FD541372CD710a7f0555972eD (Omnibus Account)

The above BTSE account is an “omnibus account,” meaning that, on information and belief, it contains funds in addition to Defendants’ funds.

B2C2

- 0x66E092fD00c4E4eb5BD20F5392C1902d738aE7bC (Omnibus Account)

The above B2C2 account is an “omnibus account,” meaning that, on information and belief, it contains funds in addition to Defendants’ funds. On information and belief, the following transactions hashtags (“TX Hash”) involved Defendants’ funds.

- 0x2d316ca9d2b52989107a020f14af82408f17c1e5c83cbd9450f5893be8b42c3a (TX Hash)
- 0xc11f4ad41b733373d0d673f6be4c4654b6beaa7529770c4b8d04ec7f62ebb948 (TX Hash)
- 0x5ff986baa5bdb8405dc04d2ccee1ca1ed52bf5ff277115ce79b6d44932555712 (TX Hash)
- 0x2ac884b86d774e2be6fa501452d413124bec1e45b6c872b11ba0fd397c3c1815 (TX Hash)
- 0xbe9b2f25b1b2da44f2c139a62e0aa97d87601187ca1a582ea74f1f0d5f84ee5d (TX Hash)
- 0x990da9517570415f126672ea5c85127ef9ecd6c3ed8f47f569dceaa5004ffbe9 (TX Hash)
- 0xe6a52077edb1dccfa984cdb66bdf3ead032cc7ceed998fbef0c95f99d6ffc03 (TX Hash)
- 0x6f4903a36c9f71f2cbcc30dc9ec9f53dea241507fb2e7e5c9191df0d67feec5a (TX Hash)
- 0x3306915a99fcc9cdc09f2ee067564af35f13474cff2f5a090295fc6bb08b2543 (TX Hash)
- 0x25f14dfd96ca516c02ef69e5594670e27c1df0425fbfe36acd77250870ce651c (TX Hash)

- 0xfa804d4bac7d30c55eafc5fd4a4c4fd344c38079b4682647550d087365140e24 (TX Hash)
- 0xa1ed9a9db5bd3394cd1417d0286f35e65a732c0e43240a8425a2734f9b376cf0 (TX Hash)
- 0xb2d775989fe37bf33c35becfa54d6fc9cebd330eccd376db3af7c25f31744ded (TX Hash)
- 0xb332d28abca541199f60dc330419d42f0bbf60458e7a2b82d74a716dc45dcf45 (TX Hash)
- 0x020b7e77931290d162d00cfe8e80c29ca9492c4d3ae41f61872fa10810f3c0e6 (TX Hash)
- 0x4cfe9b82fc5886718804bf525f429476357156e3540cc9e2c3ad92823a069d69 (TX Hash)
- 0xa91d23889f9d5b86f2b955a83de12516052a0aff004971963de3305bd8d03741 (TX Hash)
- 0xa775eb324e6fdef4b5414523b9a36609a98b75f285d6b7d119b8e18b825ae7d4 (TX Hash)

EXHIBIT C

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

STEPHEN B. SHAYA, on behalf of himself
and all others similarly situated,

Plaintiff,

-against-

KYLIE NOFS, ZHU SHICAI, LUO
YANBING, LIN YIN, YANG ZHENLIN,
and JOHN DOE NOS. 1-25,

Defendants.

DECLARATION OF KENNETH F. NEUMAN

I, Kenneth F. Neuman, declare under penalty of perjury as follows:

1. My name is Kenneth F. Neuman. I am over eighteen (18) years of age, and I make this Declaration based upon my personal knowledge and review of the relevant documents.
2. I am an attorney licensed to practice law in the State of Michigan and am admitted to practice in the Eastern District of Michigan.
3. I am one of the attorneys currently representing Plaintiff, Stephen B. Shaya, in the above-captioned action.

4. This Declaration is made in support of Plaintiff's Motion for Temporary Restraining Order and for Order to Show Cause Why a Preliminary Injunction Should Not Issue (the "Motion").

5. I have reviewed the Motion as well as the documents referenced therein. I have also reviewed, and am familiar with, the Complaint filed in this action.

6. FED. R. CIV. P. 65(b)(1)(B) requires that counsel for a party moving for entry of a Temporary Restraining Order (TRO) without notice to the adverse party must certify in writing "any efforts made to give notice and the reasons why it should not be required." In his Motion, Plaintiff has requested the Court issue a TRO without any notice to Defendants.

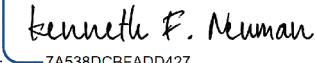
7. Some of the Defendants are unknown at this point, and only through expedited discovery to the cryptocurrency exchanges identified in Appendix A to the Plaintiff's complaint might Plaintiff be able to uncover such Does' names and locations -- either physical or electronic -- at which they can be given notice of this action brought against them.

8. The identities of the Defendants which are known and identified in the Complaint are suspected to be fictitious and used to perpetrate the "pig butchering" scheme set forth in detail in the Complaint. No effort has been made to give notice of Plaintiff's present Motion to these Defendants, as it is believed that such notice

of Plaintiff's request to freeze the wallets identified in Plaintiff's Complaint and Motion would cause Defendants to immediately take action to transfer and dissipate the cryptocurrency held in those wallets beyond the reach of discovery or recovery, thus rendering the temporary and preliminary injunctive relief sought futile.

9. For these reasons, it is my belief that granting a temporary restraining order without notice to the Defendants is the only such relief that would be effective.

I, Kenneth F. Neuman, declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:

7A538DCBFADD427...
Kenneth F. Neuman

Dated: March 15, 2024

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

STEPHEN B. SHAYA, on behalf of
Himself and all others similarly situated,

Plaintiff,

Case No.

Hon.

v.

KYLIE NOFS, ZHU SHICAI, LUO
YANBING, LIN YIN, YANG ZHENLIN,
and JOHN DOE NOS. 1-25,

Defendants.

[PROPOSED]

ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING ORDER

This matter is before the Court on Plaintiff's Emergency Motion for Temporary Restraining Order and for Order to Show Cause Why a Preliminary Injunction Should Not Issue. The Court has reviewed the Motion and Brief in Support of the same, as well as the Declaration of Stephen Shaya, the Declaration of Charles Zach, and the Declaration of Kenneth F. Neuman. The Court is satisfied that pursuant to Federal Rule of Civil Procedure 65(b)(1), the issuance of this Order to Show Cause and Temporary Restraining Order is warranted without written or oral notice to the Defendants based on Plaintiff's setting forth specific facts of the

likelihood of immediate and irreparable injury if time were afforded to allow Defendants to be heard in opposition to Plaintiff's Motion before ruling, and because notice prior to the issuance of this Order should not be required for the reasons set forth in Plaintiff's Motion and Brief in Support. Based on the foregoing, and for the reasons explained below, the Court GRANTS Plaintiff's Motion for a Temporary Restraining Order in its entirety this _____ day of _____, 2024 at _____ AM/PM.

It is hereby **ORDERED THAT:**

1. Plaintiff's motion for a temporary restraining order is GRANTED.
2. Defendants KYLIE NOFS, ZHU SHICAI, LUO YANBING, LIN YIN, YANG ZHENLIN, JOHN DOES NOS. 1-25, Binance Holdings Ltd., WhiteBIT, MaskEX, BTSE, B2C2, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or other device, or any of them, (collectively, the "Enjoined Parties") are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallet addressed listed in Appendix A of this

Order, whether such property is located inside or outside of the United States of America.

3. Plaintiff's attorneys shall cause a copy of this Order, together with a copy of the papers upon which it is based, to be served on or before March ____, 2024, upon the person or persons controlling the wallets identified in Appendix A to this Order via a special-purpose Ethereum-based token (the "Service Token"), delivered or airdropped into the wallets identified in Appendix A to this Order. The Service Token will contain a hyperlink (the "Service Hyperlink") to a website Plaintiff's counsel will cause to be created, wherein Plaintiff's counsel shall cause to be published this Order and all papers upon which it is based. The Service Hyperlink will include a mechanism to track when a person clicks on the Service Hyperlink. Such service shall constitute actual notice of this Order and sufficient service on the person or persons controlling the corresponding wallet addresses identified in Appendix A of this Order.

4. Binance Holdings Ltd., WhiteBIT, MaskEX, BTSE, B2C2, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or other device, or any of them, are hereby directed,

within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with the wallet addresses identified in Appendix A of this Order, including Defendants, and provide counsel for Plaintiff copy of such notice.

5. Pursuant to FED. R. CIV. P. 65(b), the Defendants, Enjoined Parties and anyone else wishing to be heard, shall appear on March ____, 2024 at _____ AM/PM for a hearing at _____ where they may show good cause for why this Court should not enter a preliminary injunction further enjoining the withdraw, transfer, sale, encumbrance, or alteration of the cryptocurrency or assets held in the wallet addressed listed in Appendix A of this Order during the pendency of this action, whether such property is located inside or outside of the United States of America, and imposing such additional relief as the Court deems just and proper.

6. The Defendants, the Enjoined Parties, and anyone else wishing to be heard, shall file with the Court and serve on Plaintiff's counsel any response, opposition, affidavits or declarations no later than seven (7) days prior to the hearing for preliminary injunction. If such documents are filed and and served, Plaintiff may file a reply brief in support of its request for preliminary injunctive relief no later than two (2) days prior to the preliminary injunction hearing.

7. Defendants and the Enjoined Parties are hereby on notice that failure to timely serve and file an opposition, or failure to appear at the hearing, may result in the imposition of a preliminary injunction against them pursuant to Rule 65 of the Federal Rules of Civil Procedure.

8. The temporary restraining order set forth in this Order will expire fourteen (14) days from its entry unless, for good cause shown, this Order is extended or Defendants consent that it should be extended for a longer period. However, the Court may, upon demonstration of good cause by any party-in-interest, shorten or lift this Order.

9. Defendants and the Enjoined Parties are further notified of their right to apply to the court for modification or dissolution of this Temporary Restraining Order, if appropriate and supported by a showing of good cause, on notice or such shorter notice as the court may allow.

10. Notice was not provided to Defendants prior to issuance of this Order either because their identities have not yet been ascertained or because the Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Appendix A of this Order.

11. Pursuant to FED. R. CIV. P. 65(c), the Court in its discretion determines that no bond is required.

12. This Order was Issued March ____, 2024, at ____:____ AM/PM.

Hon.

United States District Court Judge

APPENDIX A

Cryptocurrency Addresses (categorized by exchange)

Binance

- 1MiobFphxPJ4WiKahfBo2MaZQEvfpnzHp
- 0x3e771B4Aae63A8Ff4D6e748b217a478C9e3fD0Fc
- 0xbDB99397306D5Ed439A866a1196C2878fFD30af0
- 0x00adC74eca60bc8570fBfbf2Ae0001bdBA9987d1
- 0xa3e7232f754c25dB48E7B1e45935830c987E81B0
- 0xBddd281A443980a4711442a43c846604F0174e9B
- 0x1b014AbF59be85aa1A9abc16766873239637F4d6
- 0x9D6D61B5b466F870E809659B6c0EFE0cc9B06BA4
- 0xcd269B39EA2855242258F90089cc76e6f10504Ab
- 0x4f9C4ac9107A3Aec6b09Db004810Db0A6c65eD44
- 1MJeD1xARua9y9EzusBXeZwmcZftgZ48kn
- 15coUULzLprp1fQvirgRPxJKF4LaTiVMPW
- 15szMaFnEgsfYAKuVKjafPyeV7kdkKx1LV
- 15UmREUGRssw42ptnC4ie7xK1u5nhXrfi7
- 15yoLFniWtKSt8YTdBCR3YdmnX2DNk3SHM
- 16cX4spbtNpGhqzTpBhedop7EBHPS3tgrk
- 16paf23pp94feCF2YVceDDhTk36FHACihT
- 16vzwevyUmE52U4bsPAHM6cCK9sK31Rjo3
- 1725hUxmFvtaLbdC1SEyHD6ocGTC55eexx
- 1DnVrd1hDjXQz83p3Mh4tf3cFqjsGfvmMv
- 1Ec83cfjkwjSQyafJ9oFXTpgpKmgwjvo2d
- 1EesTgoexyPsPMsRTXtc2R2NVPcYYHbGP8
- 1EJQnosfynok4LZRqcMqTCfDdZMS2Xz9Pb
- 1EWgCTg17DaCHGGQf5ZZ3BV52CFKkF4vE9
- 1EYQ9uvqeGmRg41Yea42yigWoAKqftB9ik
- 1F73oPbsSb2sShxQQbbXY6F1vEQWMfYAwY
- 1FfjgorWHSPc4jgK2HKKHXMNCQHGMWRwMYZ
- 1MNMBRsVK2oLzQ2TsTwQHm4uHwz6JyxQLx
- 1MUQ7KWARGTTtysgxjxgiL1vk7r3RgYDjY
- 1MVSf7yLxBNJTHqRJxkMj3UscSpVsBW8fJ

- 1N1DEHhgk5nVV2smaeu2RPPKJ671EE7CE7d
- 12397TpnaobznX1Tgmbf7LyWtttUj2ts1g
- 125VuPdt4yxZquEqaDPf4Rb6A7btNmMaCp
- 128wXsuiKxQ9DzQ5xmCXztPvUbdogPUW95
- 18ywsJ3ivFG1QxvRjgyAZ18yzAxLSTbhwb
- 1936HAeaa6mE95dqPKkrbMTzBkAZxepJkE
- 19PZrNm7CucpCZdT39bf9p5ac1Cg1Mh5CS
- 19VVjDPkPnbYUBAep7VCL6MoEKzKPYF4pp
- 1mVKxYij5rozc5a1dtFo2oYpdnHEoDhWc
- 1MXwe75LVDGLWVPQ6PDEkJmCSxEZ6BzU7P
- 1N4mszL8HsBpNwiZzxdS1eMamtYcdEasp
- 1N9o6a29DNdf6C7VnL5gN2esER79QajSa3
- 1NA9BGRQt7rwYHgfZg4tErBzSeBTgJUALS
- 1NrbPSCbcvKBi8nENgB38vRvnPijewJMwX
- 1NSDjjzCcJGkbBedGioCbFuWqyZvtbxDuZ
- 1NshiPK15HwV2kXB5tMu49URpk8FkdWfo7
- 1NsNQ4QKYCLS1xs5fkzLcVmNyXj69w8jq7
- 1NsPUH3pp6u8W1LHkeDRAW1F9z272g9e9F
- 169w1UwZemYjXWDXkFs1TMxd1828chZpgw
- 16FcFMemjpEzFUrN1D5to8yj6e1mDwkuSE
- 1HA3FT21oJDtmE643hoiKfTN7R6mSZF38p
- 1HDZfKDE2MNdrakAEUtxNFVJSHLDTAYoJG
- 1Hiui2uvD6NtpNoSH2NS9JL526DgXh8BHg
- 1HKi6Z5f6D7dhYomM2JDQXk9kefxr46YP7
- 1MquibWP1iU5ea9g4LQVSwNkLhyF7dCC8q
- 1MSWpiNSHs4rTEBoKXZBEc9LvWmDRKZphA
- 14Jc8uZYw4xcgUBpWtZUT2YqaFuc5ZQ79k
- 14nx4kPz3jrru15NwA6bxyjoCfN39B6Hxd
- 19KjbadinBFiFqqfRWJqpGU9cMG2pbYkbz
- 19UZo6BKzWXMj1mufPaCYqMRpBFvEnSGcM
- 1AmK9LabYF6xdUPmawJ4w7kiydUc6xUh1p
- 1ASuucPKYgCs3zVStcCqhWbC9Ngh4tCAsn
- 1FVk38iEdd5KZGYR8DS6cXCdRiLNRmD4U7
- 1G5iM759XrbpGdSugAE64T3NgQ1LFKTqat
- 1GTVTLWNfYGrS5TMMg6jg9bTVV3JsyEjbS

- 1H3VMz3TSTjAWAriL1ne2fnhbmSYvZrdM7
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- 14TZhP7mz81ZUQzrs1972j634EDh1GXLWT
- 15MeVNmbBKVGMXNtkfynxSGzn6nRCLtD8p
- 15yBbpfvZXsJ41CooazuFhxJy1C5a43Bp
- 1AHS2No53TWCu3MbWMX8ohBwADu8fa2qGS
- 1Ak7DpAZ3eFhwUQn9HL1PbvdxVLDLspqRg
- 1BDfdgoRNxWdpTvzfSePieAwPPofcoPpGT
- 1BLzTUMCZu2tNrttm8sHgXwUXxwCxLLagL
- 1GCneffC1U7UYYckshcLyf4cfhh3tNYS71
- 1GH4CRqr5VQ3fmbAH6QpNT57nmuqqxHXX6
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- 1LG9yHdB7xWDTv5gRd5paxz6YDqGkzo98T
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- 1LzKstp1uQsxX58ZBFCgFZcdqWDrELCobZ

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- 14KRgxcivg391N68nqNK9iW4y7iqkpw8X
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- 164ABGGG7SpGjbyHuvAZD395DW71W1d9re
- 16WAA7Rno1AynKNo3vKPMW8CHhbsPAHsR
- 1718GhR1vpxHrzoBWTgvcb1zPzMn4Z7D3R
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- 1DbD8WvUTDZxWCR1PkKvW2sfj92kh2vU7R
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- 12EdTtq8ZZeWs2Wdr6bztN7pGDbHJP1ry5
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- 12qGNXVXSvsjZtieDupYqvq2thazyJFr5F
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- 13k77pp1z9QhiP7j7bYKwN3fTT6vAPrpCD
- 13RfJ63gLLxAj2YDcknUhu6ucDYTAhdzi1
- 13xWEjxgDjX9k82uJyvZHUFRC7b4opkaQa
- 17Q4Rayqv65sRSkhLRAHMiWxiDK6YzrTS3
- 18asd18XCewna9zBF12GMXVc2Lc4PrzWc
- 19ERtZgKiNMw9noS8qUYaP8AVBJ9fntYM4
- 1CzWyndREVGFgGcHHQUfARbhrtJEBYUkZCB
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- 1DETqftov8aca9a5x3JKRcVXmfxcUAHRzH
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- 1DTXKuJFAXWi9Z73fCKprR8FAfpkC6dwqz
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- 1E9oWH8pJ8YmtNJvEV1hxBdEk2DFKJ5hfc
- 1EcpeKZquA6Cnt89aAxKqn9bYUMq3RrNoq
- 1EeF81e5Bzo3K6eiKGhXZsHtpMWTnyqhsV
- 1BxoxcVYWcYcHwVtSLBE6Z6FQ6puJNECZu
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- 1FKtoEsRhNAaGMZAehsqS5x4SxebNUGEVN
- 1FyLKjSrNHsnHEX9KLFpBKilUsixm2LMon
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- 1JiDvvnZTfqpw9zJEugPFu39SoqqubGBqj
- 1KbMXBddvgsVo7nuiyfnkUk3zrq6FdWKEd
- 1KcUjPbCEX8L5Mf2LwnBLA3Pg7gZMXBh3V
- 1KgNNfbdSGrEoB7d1UJNULQ3jVcNnA1cYc
- 1Kkd5nbh2g5tff5gsgEYQRVUfuNJxmvcVK
- 1KMUeSMo9ep4FeSZzqJp2PsUSvEAgPLTjv
- 1KNwR5yrxF2qJHDatsDKdxsYKyLvcwoMp3
- 14X6V5WFgSRA5pEgpeb5e8H3bmdBs5vZpm
- 159uD1UYN45HKMp2nt4KTKTKVjQbMoVUbS
- 15hKD15DbCGiHmodgvsYFbLsjRTrdWzZez

- 15kBWZiYC1CD61obR7wyp6od8rWSR6P7nV
- 15n7EfMfwTJu2ANLSbdvtsGTiqGGTz8E2
- 15P7s3YJAhMjGh3u1aZdqk5QNU93wbKWM7
- 1GLnvGR2QcnjSHkNGVJ2Eev85L4mU7jhSA
- 1GMZ5TmNhFbwmXowdJwRH27seuWfa86QJc
- 1GMNLYaHvTrBzWjS5X87bKLBM11ovSvbo9
- 1HcB9Ld2dfpuQfGqpCTxaCRLfeKp31MT08
- 158ZDCPXopsAo6Ybhawduuq1XPDKR75SqY
- 1DgsexDXnhriRbSZXVHxy1WRDFmBQbDmu2
- 1LBRgXyUKnY5wsj9LMXADTSu87cBD5J2Wk
- 1Ciiza4dVvBEwbdkEQB2MsBxBKBEmsohRo
- 1HgRxi6ZwxNLVjYRUm4aUnPHEygFKN4cQu
- 1Dot7dXt8ynUa16J4Ep5wfae9Pr241TtVk
- 1DrY7D1tjoE4qTqhyb4rqozqeCbx1TyYPz
- 1DuQv2pWkXvpJjUTi492BweiwKYdsjgJji
- 1DTVWgAr5uusEPMgYW6A6vosZ5DK7BrXWe
- 1DW9FNy1RsR2SDgMHAf7yccnYqJVT3iwJX
- 1DZKPqk6awD1ZWmw1aZUXiB1SNpnK46fmU
- 1EehA1pVFkQk3gBTUh5h1a956iGt4NhXnT
- 1ELcug4RecqUsw6DH7tH7pqVbvRDarGwtM
- 1KLvo7yx4LN5gR7oW8eY1EytT5ZWMTQpXR
- 1KwLSR6atAfYsAYBFbBtKeKSN7ZJ6uvQLn
- 12FFq4VURcZjQfvMP2va2t1grjpoQU54kw
- 1MWAeR6FgaacmY4aPqyQkVJZs1WRQxCdgG
- 1MXdDyrt8oTFAi7odqQ9m7tyykhNzZjYAAQ
- 1N2szUzBsgWij2ueReFnJVAzwf9ddFxagA
- 1N6k3bryq35e8sAJdxtpaq5AZ67dsXWHQ9
- 1N6oHECud3uYhXwk3gJE5sq1sAq7Cf5m2P
- 1KeKu2XJEGkn1uraCieVCw5dp3xgf8Y7Si
- 1KfRBQS4h2nkVvofkSsG2qoTVYcpfX6UsH
- 1KeUyFmb7h5AuUXuRuA7Tb2EdGVGtYG47y
- 1KTHBVQyvsu1uaJQFnmTVEUTwfb4GZjLfr
- 1KWZDHBZFUdOk5PkDGFyPR31nPeEvHmwdw
- 16NXY7qC2Xnz9kJLjdfUKD8G3RybzRtJYU
- 175RZAg8buvQPjqJo9QhN3KmQQGYAprCkW

- 1H2XQSgYBvpUfPsCuwrR2Fykh6WxLoQkDM
- 1HdmbYAQDnN7pK49cgoqrrsNLWwDZmJoYJ
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- 1HrV7njhev1UQTTRTXzqLxDG5MKYbwMYf8
- 1MrTUKT5JdGjmA2gg77X2y6F5KQXhysy6y
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- 14iNmRSpXeBgCdMMxeU1yfScDtk3ci63ip
- 14ogaEECDuuXN2rfNdsUsn1oEd6zHMfjrq
- 19N2tN5mo4hRAs9RAsUDLwsfk7pBxSQJsX
- 19rkHRcQzcMJ7V61Tct8B8uH7FeC9BuaC1
- 1AM52X6yKqgQWGppB6RwMq8o14F3bioUYq
- 1Ask5fc3RPKKtxd8uLofzDwsdVqfBpAq3y
- 1FTkTxCJa9coo46bS6hH5TbjQJ37bY7146
- 1G4pCRUiQsxSv5Xd7P3TbGqCH4JbazDfC9
- 1GVJEJHdpSVWxiR26mCtWafUpEsoJPTYQ9
- 1H4cav6ZGbq2xvJHPB4QdwEG6CvkAekoDc
- 14QAHPAX67KrxLqRJDfvVopCbs55nGdXse
- 14VPsVjVqouBTMQenTfuiT9V9ckMGZRfi1
- 15nEeJfBhrq2WSR2kjBCdVGV3sYPYZ2MmX
- 15vpAKUjjRQ9XVijf2AnMhHDCDtH1AxhP4
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- 1BaeLbXaBJFGSgzBc6xvbCvXkP8aio6epS
- 1BL5QE1zKr22Tq9qEnkgU3tMhR9zCwEB9G
- 1Gdv8LwDfLAXG8xVoTG1i4dfgd1wJnFzNy
- 1GG8KacmHAZuqNDPtA7cxr74g7CpR7Gtjw
- 1H5i1iKfpYhK5x51m4jHhV8nJL3a38t9kk
- 1HDEaXVy2DPByVZ4pcmGeEH9gkQLgcLH7n
- 1LcQ1tutGsbLvBMfgpLuAEa3chPpC5axoH
- 1LFRvHnx48vS5jyM5cBD6HCDtgQRbTvxbj
- 1LTQDFfNJwLcCyahMpFWS3pv1fQmKcbEUo
- 1LyuBQ8s8Zz59vbdCSqDHHkjCjKBePbxBv
- 1NywPrkvfRV7wwDcEXCfNcmmLuNGWFt8tG
- 1NZdKKbPBdokgXVfNB5wAXCXrfo2VNbnsR
- 1PFz8rkprQpnRFs9vboR3cvrZnsLDSYwpx

- 1PgeJviuXMChGPsbB1GzqUo3BYA1R2wHcp
- 1D45EvvmMEYFUEt4K27Z4gBvcj4kLBDstD
- 1DaJCDCWMPxMuNADciKHnrmUE8fZkAwE43
- 1DBnQCCNfeeHkyiXdL253yZB3zWPysohWY
- 1DEq9xyaobP5A7RkihSVR1fJftAyMDG89Q
- 15S577eRkxhuLtPBGgy5DWDFoCba9nyXmH
- 16puhJn5DyFU31ZoykhG4JyVADue7WPzyH
- 17vbwJdLMBTiieyqoo7iENkZmoCwHpvQvd
- 1AzzxvtmCaTewtty1VejmMsJabdj4ruLXM
- 1BrnjhdJNHuZAwKvR5ouL4JgT2qKAfvwSf
- 1FvRHcz5udj8hMiNcq4TPus8MPn3v7s3Yv
- 1JWirwX2uvD5w2VxVk2uP5Nsrz7EPSVpHm
- 1JZ5nd4i6AMR4oNDxJrNiwptwRSXXrmCde
- 14frtNUnULbiqZqtpnapUBVkgjATVqtgeg
- 14Hnf5HwW8RTpxkfaLyH3XqpCYKhDXLP9c
- 157diGyebe2NiQB577xcfT9tvj26WcuLCY
- 15EFyTcNxyFquTtng3Hd558yZs9HtiwyT
- 16WmYHZfhB3zwSpqfpSX1TaDqYUfa6zbcu
- 174GdhvgviWBV8fnw69smJrkbYDkmDsXoy
- 1D14zBoQ6N9RUTecA6UsKfpQNe8xXnAE8c
- 1FL2inyBSyQxZv2nhKBsg3pbXEXn4JqDq9
- 1FrDNEu54dwhyBtwoahxJLcvigT5CbbYzm
- 1FVPV1LYkZt3zuRUTtc7GHB3zRMnLSVyUS
- 1HPZd5ARUsmZXLqzooSAbiT69oka4HVxxh

Whitebit

- 0x12c8aB32bfC3b5da73d987073EB854d212909c85
- 0x50bAa1501fa610d79269c50fBcd52eFE46C80d80

MaskEx

- 15BG9ze2GaB6ZZrHxcsXEWJew9K4bNPE5X
- 16fogJ7eQnSkaB7HXshjgWKG5g2XDYuZWk

BTSE

- 0xDDAad971BE05321FD541372CD710a7f0555972eD (Omnibus Account)

The above BTSE account is an “omnibus account,” meaning that, on information and belief, it contains funds in addition to Defendants’ funds.

B2C2

- 0x66E092fD00c4E4eb5BD20F5392C1902d738aE7bC (Omnibus Account)

The above B2C2 account is an “omnibus account,” meaning that, on information and belief, it contains funds in addition to Defendants’ funds. On information and belief, the following transactions hashtags (“TX Hash”) involved Defendants’ funds.

- 0x2d316ca9d2b52989107a020f14af82408f17c1e5c83cbd9450f5893be8b42c3a (TX Hash)
- 0xc11f4ad41b733373d0d673f6be4c4654b6beaa7529770c4b8d04ec7f62ebb948 (TX Hash)
- 0x5ff986baa5bdb8405dc04d2ccee1ca1ed52bf5ff277115ce79b6d44932555712 (TX Hash)
- 0x2ac884b86d774e2be6fa501452d413124bec1e45b6c872b11ba0fd397c3c1815 (TX Hash)
- 0xbe9b2f25b1b2da44f2c139a62e0aa97d87601187ca1a582ea74f1f0d5f84ee5d (TX Hash)
- 0x990da9517570415f126672ea5c85127ef9ecd6c3ed8f47f569dceaa5004ffbe9 (TX Hash)
- 0xe6a52077edb1dccfa984cdb66bdf3ead032cc7ceed998fbef0c95f99d6ffc03 (TX Hash)
- 0x6f4903a36c9f71f2cbcc30dc9ec9f53dea241507fb2e7e5c9191df0d67feec5a (TX Hash)
- 0x3306915a99fcc9cdc09f2ee067564af35f13474cff2f5a090295fc6bb08b2543 (TX Hash)

- 0x25f14dfd96ca516c02ef69e5594670e27c1df0425fbfe36acd77250870ce651c (TX Hash)
- 0xfa804d4bac7d30c55eafc5fd4a4c4fd344c38079b4682647550d087365140e24 (TX Hash)
- 0xa1ed9a9db5bd3394cd1417d0286f35e65a732c0e43240a8425a2734f9b376cf0 (TX Hash)
- 0xb2d775989fe37bf33c35becfa54d6fc9cebd330eccd376db3af7c25f31744ded (TX Hash)
- 0xb332d28abca541199f60dc330419d42f0bbf60458e7a2b82d74a716dc45dcf45 (TX Hash)
- 0x020b7e77931290d162d00cfe8e80c29ca9492c4d3ae41f61872fa10810f3c0e6 (TX Hash)
- 0x4cfe9b82fc5886718804bf525f429476357156e3540cc9e2c3ad92823a069d69 (TX Hash)
- 0xa91d23889f9d5b86f2b955a83de12516052a0aff004971963de3305bd8d03741 (TX Hash)
- 0xa775eb324e6fdef4b5414523b9a36609a98b75f285d6b7d119b8e18b825ae7d4 (TX Hash)