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Marilyn Burgess - District Clerk Harris County
Envelope No. 106916974
By: Simone Mills
Filed: 10/15/2025 2:48 PM

CAUSE NO. 2024-46570

NATALIA ELMOWAFI,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	334th JUDICIAL DISTRICT

**PLAINTIFF'S VERIFIED FIRST AMENDED PETITION
APPLICATION FOR TEMPORARY RESTRAINING ORDER,
TEMPORARY, AND PERMANENT INJUNCTIONS**

Plaintiff Natalia Elmowafi ("Plaintiff") files this, her Verified First Amended Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions as follows:

I. DISCOVERY CONTROL PLAN

1. Plaintiff intends to conduct discovery under Level 2 pursuant to Texas Rule of Civil Procedure 190.3.

II. INTRODUCTION

2. This case involves a cryptocurrency scam in which Defendants solicit investors to transfer cryptocurrency assets to a fake cryptocurrency trading platform, falsely represent that the investors have earned positive returns, and then steal their money.

3. Defendants contact potential victims using generic inquiries about cryptocurrency investments. When a person responds, Defendants engage in further correspondence, sending standardized messages about investment strategies to entice them into investing. They then provide cryptocurrency wallet addresses and instructions for transferring funds, giving victims access to a fake cryptocurrency trading website purportedly linked to a legitimate trading platform.

4. Defendants falsely represent that the trades on the fake platform are real. Victims receive real-time reports of gains and current position valuations, leading them to believe they are trading actual cryptocurrencies on a legitimate exchange. These representations are entirely false.

5. In this case, Defendants utilized a fraudulent trading platform to lure Plaintiff to transfer funds to cryptocurrency wallets under Defendants' control. Plaintiff's funds were unlawfully taken by Defendants and transferred by Defendants into the wallets set forth in Exhibit A, or in other cryptocurrency accounts controlled by Defendants as set forth in Exhibit A.

6. Defendants initially requested small contributions to set up Plaintiff's "account." Defendants then claimed that Plaintiff had earned returns from her trading activities. When Plaintiff attempted to withdraw funds, Defendants persuaded her to deposit additional funds under the pretext of standard requirements such as trading fees, taxes, or "gas" fees. After securing these additional deposits, Defendants stole all the contributed money and transferred it to other wallets under their control.

7. Defendants attempted to conceal their actions by transferring stolen assets through a series of online transactions designed to hide their trail. Through the substantial effort of her counsel and investigative experts, Plaintiff has identified specific cryptocurrency wallets in which the ill-gotten gains of Defendants' scheme are ***presently*** held. These are set forth in Exhibit A and have been previously frozen by the Temporary Restraining Order and Temporary Injunction previously entered by this Court.

8. In the absence of freezing orders of the kind entered by this Court, Defendants could have transfered these cryptocurrency proceeds beyond the Plaintiff's knowledge and reach at any moment. Plaintiff therefore asks that the Tempoary Injunction entered by this Court continue and

that permanent injunctive relief be entered. Without such relief, Plaintiff will be left without an adequate remedy at law.

9. Plaintiff resides in Houston, Harris County, Texas. She was deceived by one or more individuals, including a person identifying himself as Chris Yang ("Yang"), as part of a scheme to transfer funds to cryptocurrency wallets controlled by Defendants via the fraudulent trading platforms.

III. PARTIES

10. Plaintiff is a resident of Harris County, Texas. The last four digits of her Texas Drivers' License are 0991.

11. Defendants have gone to great lengths to conceal their true identities, including anonymously registering their fake website. The true identities and residences of the Defendants are currently unknown and are subject to ongoing investigation. Defendant "Yang" contacted Plaintiff using three U.S. phone numbers: 424-335-4392 and 213-569-3590, which he claimed were his personal numbers, and 917-470-7696, which he stated was his work number. Yang also represented himself as an officer of a company called Row. Atempts have been made to serve "Yang" in person at his purported place of employment, but such attempts have been unsuccessful. With leave of Court, he has previously been served electronically and has not answered.

12. Due to the defendants' use of fictitious identities and unknown locations, traditional service methods are unavailable. Pursuant to Rule 106, Plaintiff has sought and received judicial approval for alternative service methods, reasonably calculated to provide to provide actual notice, including service via airdropping a special purpose token to the defendants' cryptocurrency wallet, as further described herein.

13. The amounts sought by Plaintiff exceed the minimum jurisdictional limits of this Court.

14. This action accrued in Harris County, Texas, Defendant is domiciled in Harris County, Texas, and the property underlying the claims brought herein is located in Harris County, Texas.

15. Jurisdiction and venue are proper in this Court.

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

IV. STATEMENT OF FACTS

A. PIG BUTCHERING BRIEFLY EXPLAINED

17. Defendants' scheme is called a "pig butchering" scam. Defendants first reach out to or otherwise make contact with victims by sending fake "wrong number" texts, sometimes including pictures, meet victims on dating apps using fake profiles, or send messages through social media. When victims respond, even to say the scammer has the wrong number, the con begins. The scammer will attempt to strike up a conversation, attempting to gain the victim's confidence or establish a personal connection. Eventually, the scammer moves the conversation to an encrypted method of communication, like WhatsApp or Telegram, and turns the conversation toward cryptocurrency investing.

18. These scams typically involve the promise of returns after perpetrators fabricate evidence of positive performance on fake websites made to look like functioning cryptocurrency trading venues, job sites, or investment companies. Victims are enticed to "invest" or send money based on misrepresentations. After victims have transferred substantial sums, typically in cryptocurrency, the scammers disappear and cover their tracks by moving the stolen funds through

a maze of subsequent transactions, causing victims severe financial loss. This scheme involves sophisticated psychological manipulation and exploits the anonymity and irreversibility of cryptocurrency transactions. Victims in the United States have collectively lost billions of dollars, and these "pig butchering" schemes have been the subject of state and federal government investigation and prosecution, including recently in Texas.[1]

19. Defendants in this case made false promises about the legitimacy of a cryptocurrency trading platform. Plaintiff was enticed to invest through this platform with the expectation of such legitimacy. Defendants further promised the Plaintiff that she could withdraw the money she had earned, but only after making additional payments. Plaintiff was never able to withdraw anything.

B. PLAINTIFF IS "PIG BUTCHERED" BY DEFENDANTS

20. The scheme involving Plaintiff began on or about November 18, 2023, when Defendant Yang contacted her via text message from phone number 1-917-470-7696. Defendant Yang represented that he was a 45-year-old male with a daughter, originally from Hong Kong. He described a cryptocurrency platform called "upbitex" as legitimate and informed Plaintiff that transactions could be conducted on this platform after registering with Coinbase and transferring funds from a Coinbase wallet. Below is a screenshot from Defendant Yang, who identified himself as "Chris The Row Ceo," providing Plaintiff with instructions to access the "upbitex" platform:

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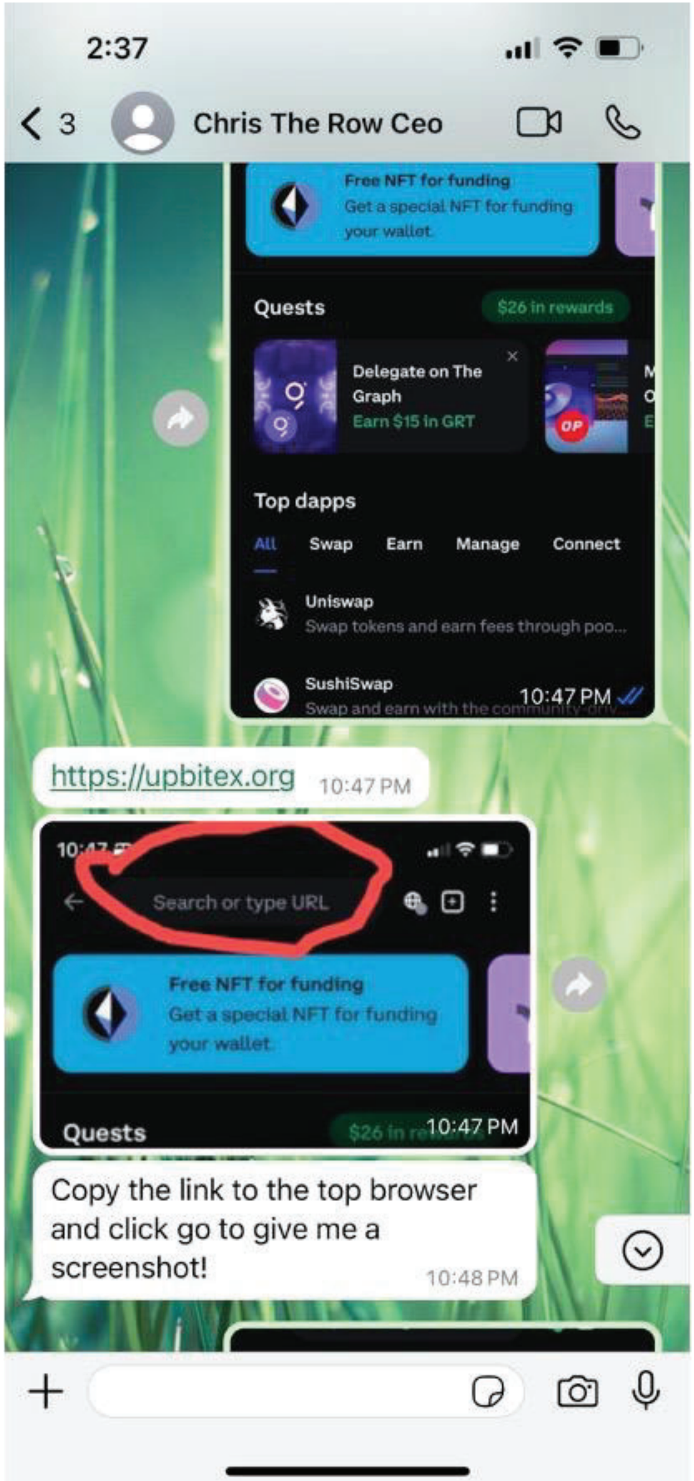
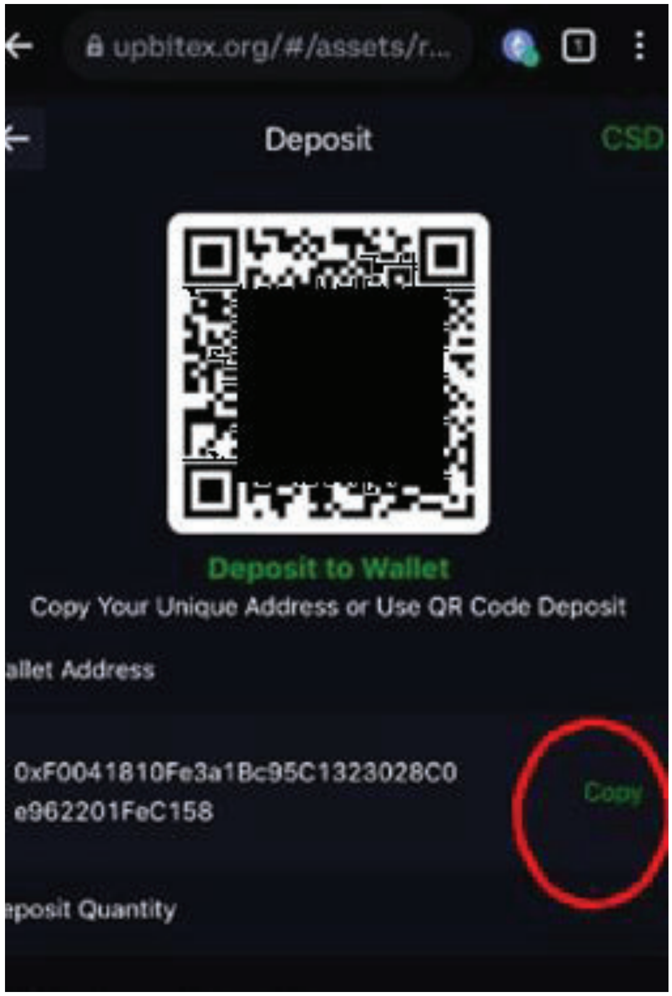
[1] See U.S. Attorney's Office, Eastern District of Texas Press Release: Chinese National Charged in "Pig Butchering" Scheme, May 21, 2024, https://www.justice.gov/usao-edtx/pr/chinese-national-charged-pig-butchering-scheme; FinCEN Alert of Prevalent Virtual Currency Investment Scam Commonly Known as "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; Teele Rebane & Ivan Watson, Killed by a Scam: A Father Took His Life after Losing His Savings to International Criminal Gangs; He's Not the Only One, Jun. 19, 2024, Cable News Network, https://www.cnn.com/2024/06/17/asia/pig-butchering-scam-southeast-asia-dst-intl-hnk/index.html.



21. Defendant Yang gained Plaintiff's confidence during the following days and proposed an investment opportunity involving cryptocurrency. Plaintiff followed Defendant

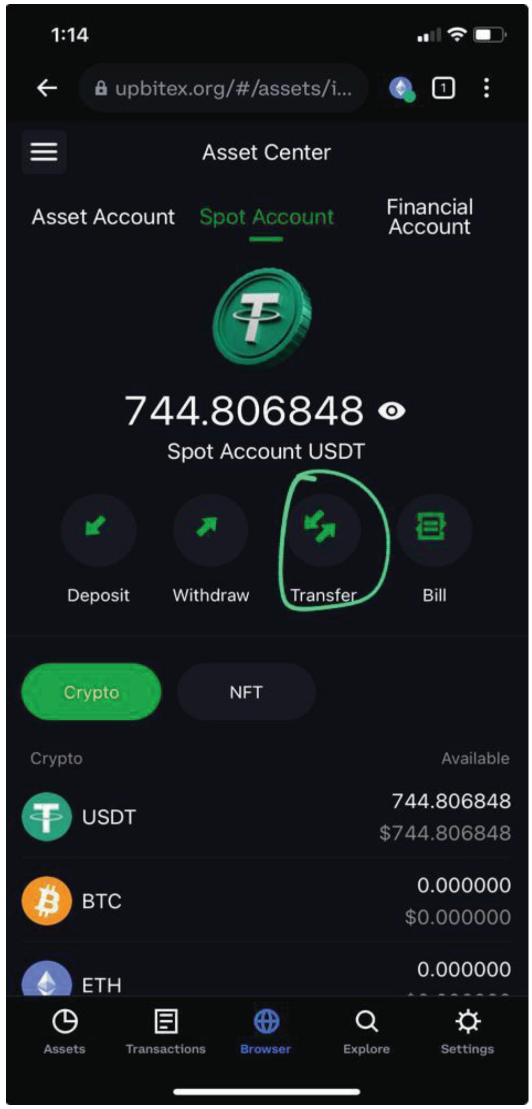
Yang's instructions to register her Coinbase wallet on November 23, 2024, and made an initial deposit by withdrawing cryptocurrency from her Coinbase account and using the "upbitex" platform, as indicated in the screenshot below:[2]



22. On or about November 24, 2023, Plaintiff transferred funds in a series of small transactions from her account at Coinbase to a wallet address that purported to be on the "upbitex"

[2] The QR code has been obstructed.

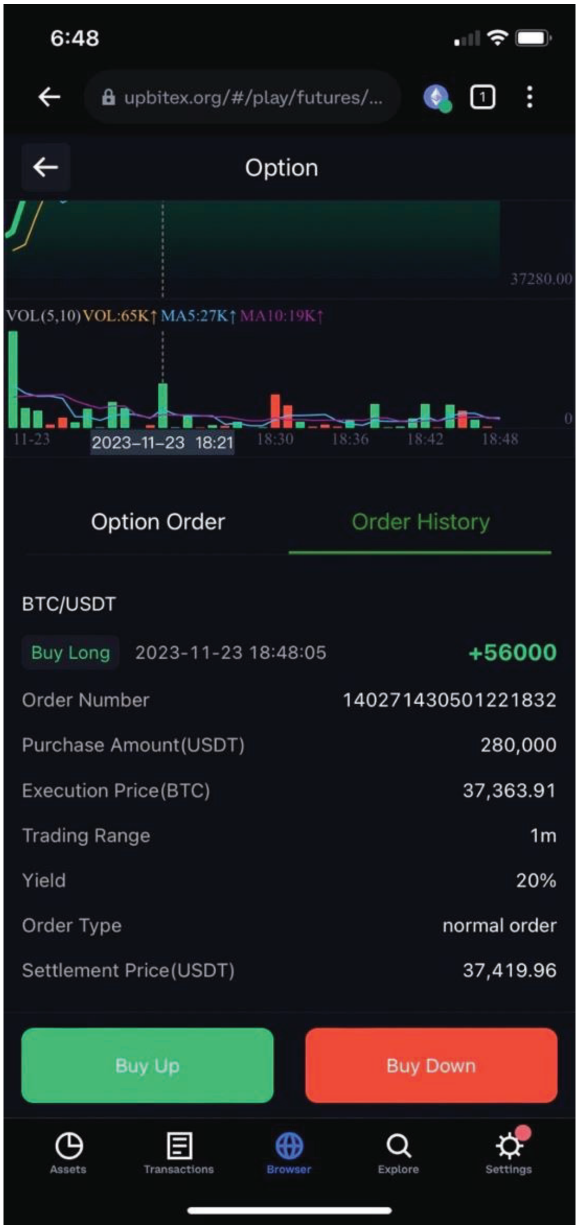
platform. The platform showed that the funds were in her account, as indicated in the screenshot below, which shows approximately $745 of value:



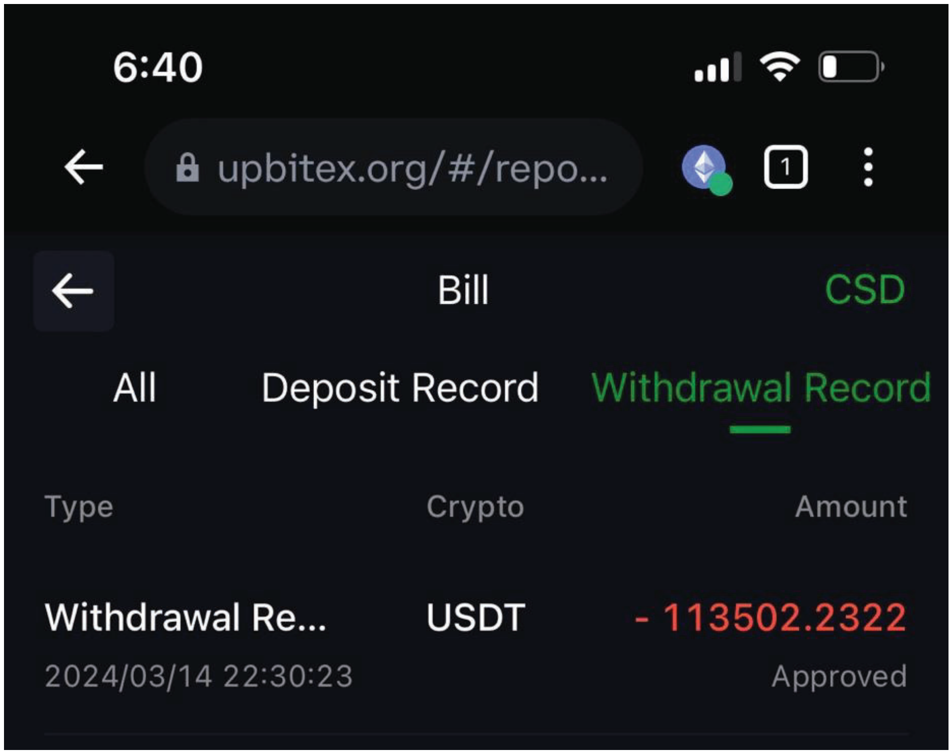
23. Defendant Yang represented that Plaintiff could use her funds on the platform to invest various Bitcoin trading strategies. According to reports from the platform, these trading strategies were profitable, and Plaintiff was able to withdraw $756.

24. Based on the purported early success of these strategies, and the apparent legitimacy of the platform, Plaintiff made additional deposits on or about November 30, 2024, totaling $30,000, and continued to invest in various trading strategies, as advised by Defendant

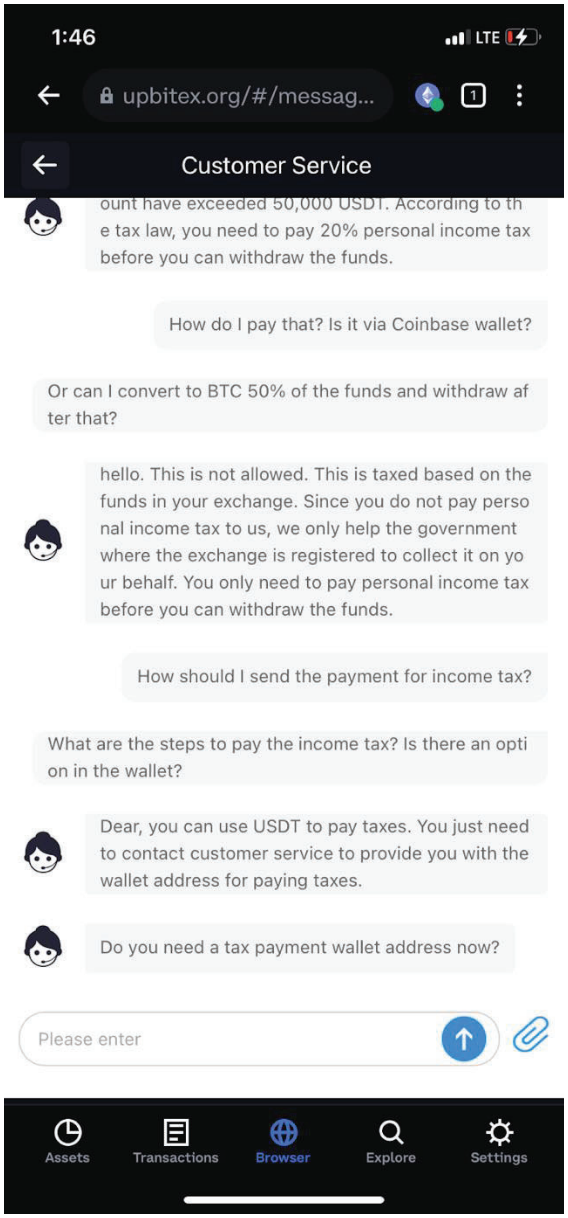
Yang. These strategies also appeared to be profitable, as indicated by the screenshot below, showing a profit of $56,000:

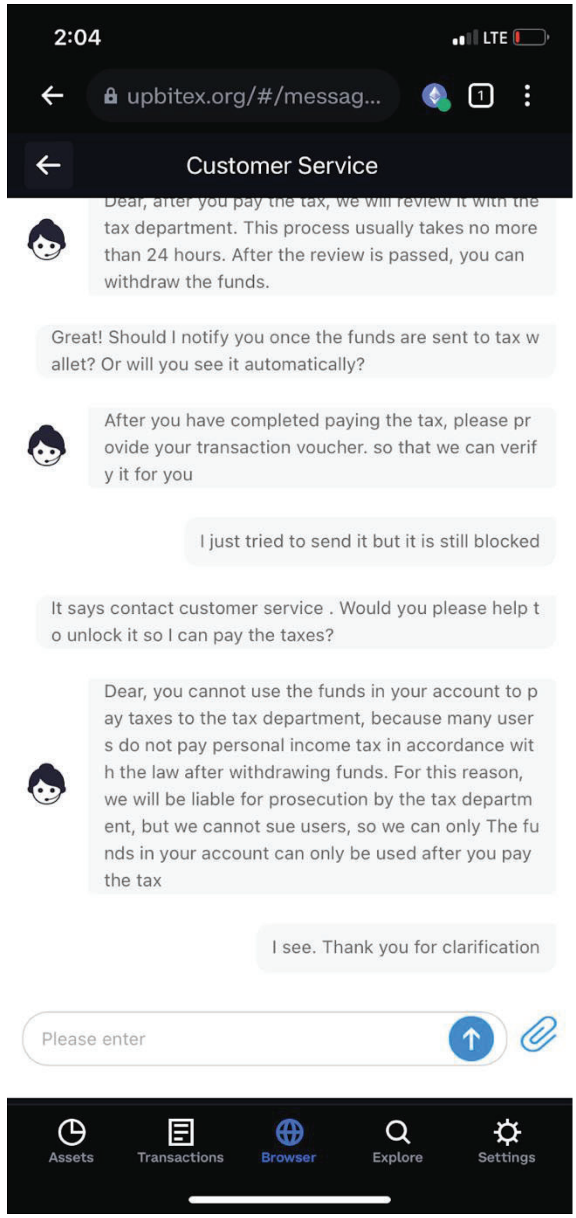


25. Plaintiff continued to use the "upbitex" platform during 2023 and early 2024, and her account appeared to reflect significant profits. On March 14, 2024, Plaintiff attempted to withdraw funds, as indicated by the screenshot below:

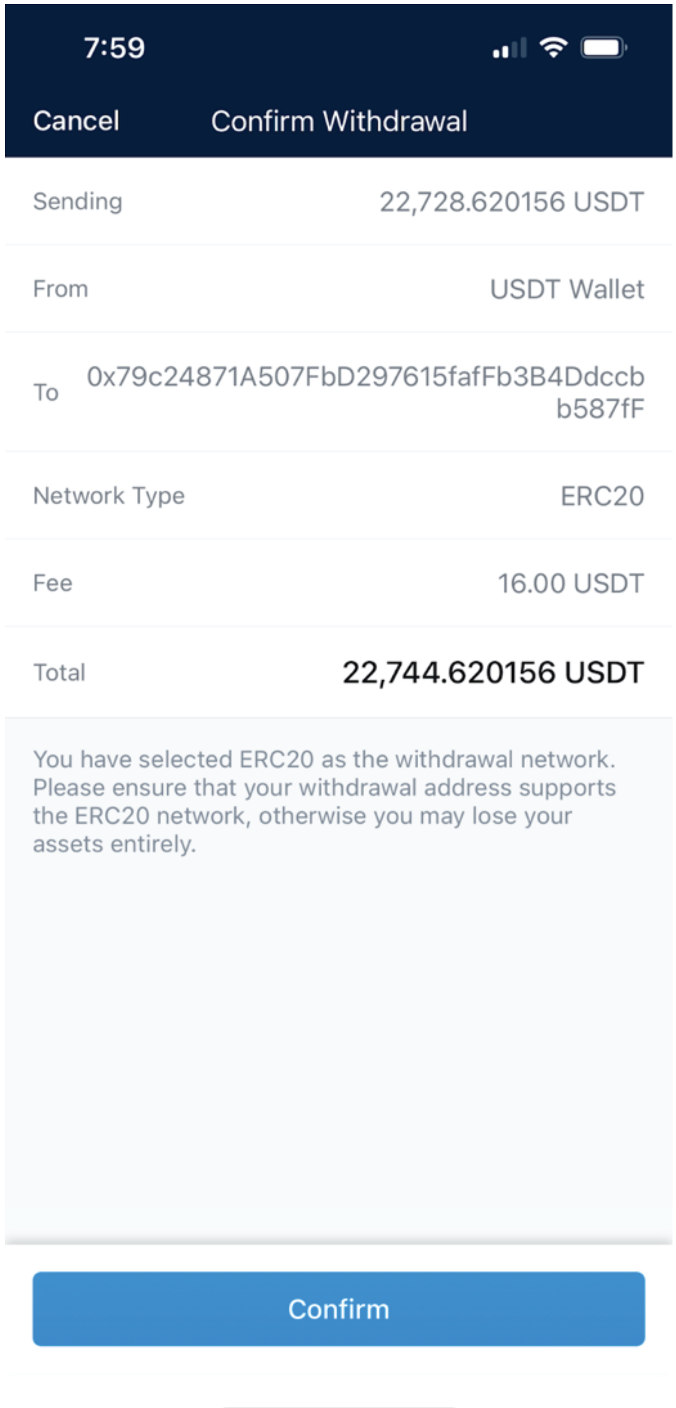


26. Representing themselves as "Customer Service" contacts at the "upbitex" platform, however, Defendants informed Plaintiff that she would be required to pay an additional "tax" in order to make withdrawals, as indicated in the screenshots below:

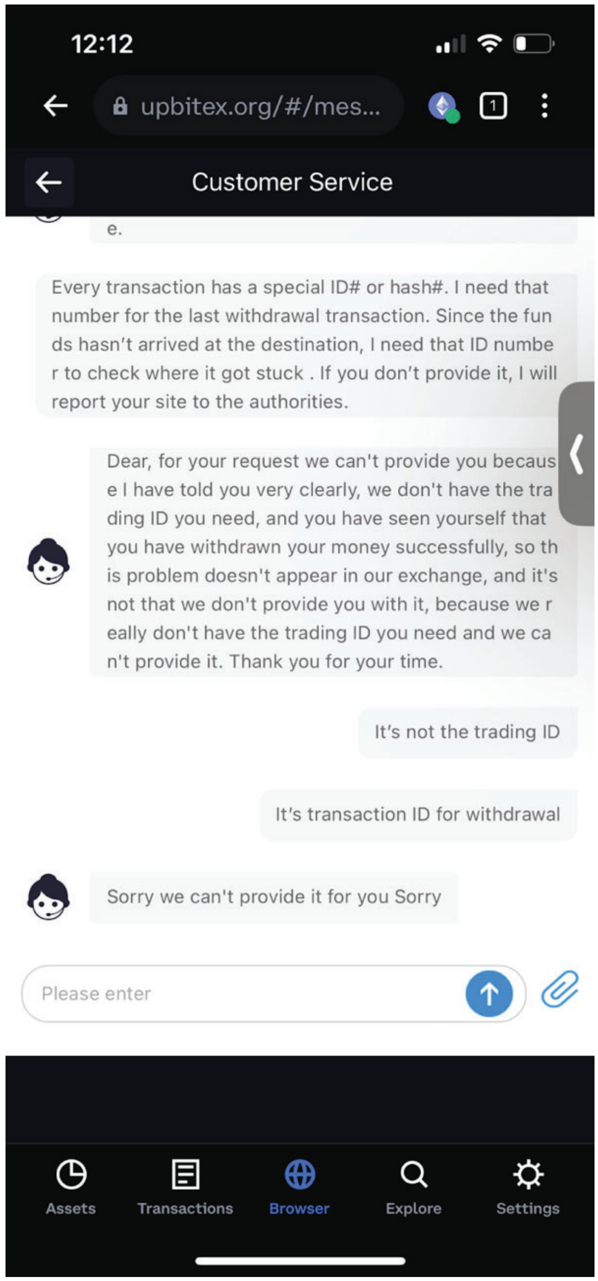




27. Plaintiff followed Defendants' instructions, and paid approximately $22,745 of "tax," as indicated in the screenshot below:


7:59
Cancel
Confirm Withdrawal
Sending
22,728.620156 USDT
From
USDT Wallet
To
0x79c24871A507FbD297615fafFb3B4Ddccb
b587fF
Network Type
ERC20
Fee
16.00 USDT
Total
22,744.620156 USDT
You have selected ERC20 as the withdrawal network. Please ensure that your withdrawal address supports the ERC20 network, otherwise you may lose your assets entirely.
Confirm

28. After Plaintiff sent these additional funds, Defendants refused to permit her to withdraw any funds from the platform, giving various excuses, as indicated in the screenshot below:



29. Defendants subsequently blocked Plaintiff from accessing her accounts and transferring funds, using standardized excuses.

30. After Plaintiff could not recover her funds, she contacted Inca Digital ("Inca"), a cryptocurrency investigation firm, which traced her transactions and confirmed that Defendants were orchestrating a fake cryptocurrency trading platform scheme. As described below, Inca investigated other transactions involving the fake trading platforms and found that these transactions were part of a common scheme to steal Plaintiff's funds.

C. INCA CAPITAL CONFIRMS THE SCHEME AND TRACES PLAINTIFF'S STOLEN ASSETS

31. Inca Digital is a sophisticated digital market investigation firm. It was founded in 2009 when it built open-source data analytics tools for INTERPOL, helping catch bad actors in illicit markets. Inca's CEO, Adam Zarazinski, spent four years as an active-duty judge advocate with the US Air Force, serving at Joint Base Andrews and in Afghanistan. Others at the firm come from similar backgrounds, having worked for the US and other militaries and intelligence agencies from the US and around the world. Relying on Inca's investigations, courts around the country have entered orders freezing wallets containing potentially hundreds of millions of dollars in stolen cryptocurrency. In 2023, the Defense Advanced Research Projects Agency ("DARPA") contracted with Inca to study cryptocurrency markets, "exploring advanced methods for identifying and analyzing activity involving distributed ledgers, crypto and other digital assets." [3] A "beneficial side effect" of DARPA's work with Inca is gaining "a better understanding of illicit actors' behavior," according to DARPA a program manager. *Id*.

32. Here, Inca's investigation revealed that Defendants used the fake cryptocurrency platform to steal Plaintiff's assets, and then sent those assets through a web of transactions designed to hide their trail.

[3] See https://www.axios.com/2023/04/11/inca-digital-darpa-crypto, last accessed on July 23, 2024.

33. As outlined in Exhibit A, Inca identified the specific cryptocurrency wallets in which the ill-gotten gains of Defendants' scheme are ***presently*** held. In the absence of orders freezing these accounts, Defendants could transfer these cryptocurrency proceeds beyond Plaintiff's knowledge and reach at any moment.

34. 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. This tracing led to the wallets set forth in Exhibit A, each of which hold assets involved in transactions that originated from Plaintiff's wallets.

35. After identifying the wallet addresses to which Plaintiff's funds were transferred, Inca "reverse traced" in phase two. This process allowed Inca to identify additional wallet addresses involved in the same transaction patterns, revealing more victims of the scheme.

36. Based on Inca's investigation, Defendants' conversion scheme involved transactions from November 18, 2023, through at least the date of the filing of this lawsuit.

37. In sum, Defendants employed a systematic multi-stage crypto theft scheme to target victims, including Plaintiff, and lured them to transferring increasing amounts of cryptocurrency through a fake cryptocurrency trading platform. The final step in this scheme was the theft of Plaintiff's funds by Defendants.

38. The addresses of the wallets identified by Inca, where Plaintiff's funds were ultimately sent, are listed in Exhibit A and categorized by the exchanges they are on. Plaintiff has previously sought and obtained orders freezing those wallets. Plaintiff repeats here her request for a Temporary Restraining Order, a Temporary Injunction, and a Permanent Injunction to freeze these wallets.

39. Plaintiff previously filed this suit as a class action. In light of information learned since its initiation, class allegations are withdrawn and this matter is asserted on behalf of Plaintiff only.

40. Plaintiff seeks exemplary damages and requests that the Court make a finding, pursuant to Texas Civil Practice and Remedies Code § 41.008(c), that the statutory cap on exemplary damages does not apply. Defendants' conduct was committed knowingly and intentionally, Defendants acted with actual malice, fraud, and gross negligence. The acts and omissions described herein caused severe and devastating harm to Plaintiff and were committed with conscious disregard for Plaintiff's rights and safety.

41. Under § 41.008(c)(1)-(2), the limitations on exemplary damages are inapplicable because the harm resulted from conduct that meets the statutory definitions of malice, fraud, or intentional wrongdoing as set forth in § 41.001(7), (11), and (13) of the Texas Civil Practice and Remedies Code. Plaintiff therefore seeks a finding on these grounds and prays for an award of exemplary damages without the limitation imposed by § 41.008(b).

V. Causes of Action

A. Conversion

42. Plaintiff realleges and incorporate by reference all preceding paragraphs.

43. Defendants intentionally and unlawfully took possession of the Plaintiff's cryptocurrency assets, converting them for their own use.

44. The cryptocurrency assets transferred by Plaintiff to the Defendants was (1) delivered for safekeeping, (2) intended to be kept segregated, (3) substantially in the form in which it is received or an intact fund, and (4) not the subject of a title claim by any Defendant.

45. The cryptocurrency assets of Plaintiff are or will be specifically identifiable, because Defendants' wrongful actions alleged herein involve cryptocurrency assets that are traceable along one or more blockchain technologies used to transfer cryptocurrency assets.

46. This act of conversion has caused significant financial harm to the Plaintiff.

B. Money Had and Received / Unjust Enrichment

47. Plaintiff realleges and incorporates by reference all preceding paragraphs.

48. Defendants hold money or cryptocurrency stolen from Plaintiff. That money or cryptocurrency was obtained unlawfully.

49. In equity and good conscience, all money or cryptocurrency held in the wallets described in Exhibit A belong to the Plaintiff. It was stolen from her.

C. Writ of Sequestration / Replevin

50. Plaintiff realleges and incorporates by reference all preceding paragraphs.

51. Defendants have taken possession of Plaintiff's personal property, namely cryptocurrency. In equity and good conscience, all cryptocurrency held in the wallets described in Exhibit A belong to the Plaintiff, the person from whom they were stolen.

52. Before the entry of the Temporary Restraining Order and Temporary Injunction, there was an immediate danger that the Defendants in possession of that property would conceal or dispose of it through anonymous and speedy asset dissipation. It would be a simple matter for Defendants 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. Here, through substantial effort, the current location of the cryptocurrency has been established. But that location can change quickly because Defendants can quickly and easily move the cryptocurrency

to other digital wallets, continuing to put those assets outside the reach of victims and this Court, requiring the maintenance of the previously entered Temporary Injunction.

53. The only way to prevent the foregoing irreparable harm is the sequestration of the wallets that currently hold the cryptocurrency, thereby preventing Defendants from transferring the cryptocurrency to parts unknown.

D. Fraud

54. Plaintiff realleges and incorporates by reference all preceding paragraphs.

55. Defendants represented to Plaintiff that transferring assets into wallets they described was part of an investment opportunity.

56. The representation that the "trading platform" into which Defendants induced Plaintiff to "invest" was material. Without it, Plaintiff would not have transferred her assets into the Defendants' phony trading platform.

57. When the Defendants made the representation that Plaintiff was transferring assets into a trading platform, that representation was false. The Defendants knew the representation was false. In fact the Defendants fabricated the entire transaction, including the website they created or published to make it appear Plaintiff was investing in a legitimate trading platform.

58. The Defendants made representations to Plaintiff intending that she act on it. They lied to her to get her to transfer assets into the wallets they controlled by telling her those wallets were actually a trading platform.

59. The Plaintiff relied on the representations made by the Defendants, something they counted on to persuade her to "invest."

60. But for the false representations made by the Defendants, Plaintiff would never have transferred her assets to them. The Defendants' false representations to the Plaintiff caused Plaintiff's injury.

E. Texas Theft Liability Act
(Tex. Civ. Prac. & Rem. Code § 134.001 et seq.)

61. Plaintiff realleges and incorporates by reference all preceding paragraphs.

62. Plaintiff was entitled to possession of her cryptocurrency assets.

63. Defendants unlawfully appropriated Plaintiff's cryptocurrency assets in violation of Texas Penal Code § 31.03.

64. Defendants' unlawful appropriation was made with the intent to deprive Plaintiff of her cryptocurrency assets.

65. Defendants' wrongful conduct caused Plaintiff significant financial harm in excess of $100,000.

66. Upon proof of actual damages, Plaintiff is entitled to additional statutory damages of up to $1,000 from Defendants under Texas Civil Practice & Remedies Code § 134.005(a)(1).

67. Plaintiff's injury resulted from Defendants' malice or actual fraud, which entitles Plaintiff to exemplary damages under Texas Civil Practice & Remedies Code § 41.003(a).

68. Plaintiff's injury resulted from Defendants' felony theft in the third degree or higher under Chapter 31 of the Texas Penal Code that was committed knowingly or intentionally, which exempts this claim from the cap on exemplary damages under Texas Civil Practice & Remedies Code § 41.008(c).

69. Plaintiff is entitled to recover her reasonable and necessary attorneys' fees under Texas Civil Practice & Remedies Code § 134.005(b).

VI. *EX PARTE* INJUNCTIVE RELIEF

70. Plaintiff realleges and incorporates by reference all preceding paragraphs.

71. The Court has previously entered an *ex parte* temporary restrainging order permitted preventing Defendants, non-parties Binance Holdings Ltd., OKX, Gate.io, KuCoin, LBank, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other person(s) through which they act, or who act in active concert with them and who received actual notice of such order(s) from: withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallet addresses listed in Exhibit A of the TRO, whether such property is located inside or outside the United States of America. Such a freeze was and remains necessary to preserve the possibility of restitution for the Plaintiff.

72. Plaintiff's request for that TRO was made on an *ex parte* basis for the reasons described above and because the Defendants are a criminal enterprise who have already caused Plaintiff to lose substantial amounts of money, repeatedly providing excuses as to why money cannot be returned to her. Defendants transferred Plaintiff's money between wallets repeatedly in an effort to hide it from her. It is only because of the extraordinary skill of Plaintiff's investigators that the wallets identified in Exhibit A have been found. Had the Defendants received notice of the TRO, they would moved the assets again, but this time in a way that Plaintiff could not have traced.

73. After entry and service of the TRO, the Court held a hearing on Plaintiff's application for temporary injunction. That request was granted and the temporary injunction has been in place since that date and should continue. Without it, Plaintiff will suffer immediate and

irreparable injury, loss, or damage because Defendants will, as they have in the past, transfer the stolen cryptocurrency, hiding it from Plaintiff and outside the reach of this Court.

74. Pursuant to Texas Rule of Civil Procedure 684, "no writ of injunction shall issue except upon the giving of a bond." However, Texas courts have "considerable discretion" in setting the amount of the bond. *See Hsin-Chi-Su v. Vantage Drilling Co*., 474 S.W.3d 284, 304 (Tex. App.—Houston [14th Dist.] 2015, pet. denied). Here, the provisional relief provided aimed to freeze the wallets where the stolen cryptocurrency was traced. Defendants have no legitimate claim to this stolen property and will sustain no damages if they are restrained from further transferring these assets. Plaintiff requests the nominal bond previously set and provided continue.

75. The Court has previously authorized a method of service that is the best available under the circumstances and is reasonably calculated to provide actual notice to Defendants. Traditional methods of service are unavailable due to Defendants' use of fictitious identities and unknown locations. Plaintiff therefore requested and the Court authorized an alternative method of service pursuant to Texas Rule of Civil Procedure 106(b), which allows for service in any manner that the court finds will be reasonably effective to give the defendant notice of the suit.

76. Plaintiff will serve this First Amended Petition in the manner previously authorized by the Court.

VII. CONDITIONS PRECEDENT

77. All conditions precedent have been performed, occurred, or excused.

VIII. MAXIMUM DAMAGES

78. Plaintiff seeks monetary relief in excess of $1,000,000. Tex. R. Civ. P. 47(c)(4).

IX. Conclusion and Prayer

Plaintiff prays that the Court enter a temporary restraining order as described above, temporary and permanent injunctive relief, and, upon final trial of this case, she have and recover judgment against Defendants as follows:

a. Actual damages;

b. Disgorgement of all funds currently held in the cryptocurrency wallets described in Exhibit A;

c. Distribution of all funds held in the cryptocurrency wallets described in Exhibit A;

d. Replevin;

e. Exemplary damages;

f. Prejudgment interest on all amounts unlawfully retained by Defendants;

g. Postjudgment interest at the highest amount permimtted by law on all amounts awarded until paid;

h. Costs of Court; and

i. All other and further relief to which she may show herself to be justly entitled.

Respectfully submitted,

BERG PC

By: */s/ Geoffrey Berg*
Geoffrey Berg (gberg@bergpc.com)
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3700 Buffalo Speedway, Suite 1150
Houston, Texas 77098
713-526-0200 (tel)
832-615-2665 (fax)

DOW GOLUB REMELS & GILBREATH, PLLC

By: */s/ Andrew S. Golub (by permission)*

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ATTORNEYS FOR PLAINTIFF

CAUSE NO. 2024-46570

NATALIA ELMOWAFI, Plaintiff, V. CHRIS YANG and JOHN DOES 1-25, Defendants.	§ § § § § § § § §	IN THE DISTRICT COURT OF HARRIS COUNTY, TEXAS 334th JUDICIAL DISTRICT

VERIFICATION

STATE OF TEXAS §
§
COUNTY OF HARRIS §

My name is Natalia Elmowafi. I am over 18 years of age, have never been convicted of a felony or a crime of moral turpitude, and am otherwise competent to execute this declaration. I am the plaintiff in the above-captioned matter.

The facts stated in Paragraphs 17-30 of Plaintiff's Verified First Amended Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions ("First Amended Petition") are within my personal knowledge and are true and correct. Moreover, the screenshots included in the Petition were taken by me on my phone. They are true and accurate representations of what they purport to be. I have not altered them in any way, except as indicated above to protect personally identifiable information.

My name is Natalia Elmowafi, my date of birth is July 12, 1977, and my address is 7100 Almeda Rd., Apt. 2230, Houston, Tx 77054. I declare under penalty of perjury the foregoing is true and correct.

Executed in Houston, Harris County, Texas on 10/04, 2025.

____
Natalia Elmowafi

CAUSE NO. 2024-46570

NATALIA ELMOWAFI,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	334th JUDICIAL DISTRICT

VERIFICATION

STATE OF NORTH CAROLINA	§
	§
COUNTY OF IREDELL	§

My name is Maya Vick. I am over 18 years of age, have never been convicted of a felony or a crime of moral turpitude, and am otherwise competent to execute this declaration. Attached hereto is a true and correct copy of my curriculum vitae.

I am employed as a data analyst by 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 the above-captioned action. The Inca Digital investigator who previously investigated this matter, Charles Zach, is now deceased.

The work done by Mr. Zach are within Inca Digital's files. Such work, including correspondence, notes, memoranda, and all electronic and digital records. I am a custodian of records for Inca Digital. I have personal knowledge of the manner in which its records are created and maintained. The records I reviewed are kept by Inca Digital in the regular course of business, and it was the regular course of business of Inca Digital for an employee or representative of Inca Digital with knowledge of the act, event, condition, opinion, or diagnosis recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time or reasonably soon thereafter. The records attached hereto or set out above are exact duplicates of the originals.

I have reviewed the work done by Mr. Zach and found it to be accurate and reliable. I have also done the same tracing work done by Mr. Zach for plaintiff and have made the same findings. Accordingly, the verification and the testimony given by Mr. Zach at the hearing on Plaintiff's application for temporary injunction are incorporated by reference as if fully set out herein.

Having reviewed Inca's file, retraced the transaction at issue, the facts stated in Paragraphs 31-38 of Plaintiff's Verified First Amended Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions ("First Amended Petition") are within my personal knowledge and are true and correct.

My curriculum vitae, reproduced in full below, is true and correct.

Based upon my expertise in blockchain forensics and my substantial experience investigating "pig butchering" schemes similar to this one, if Plaintiff is required to wait until after the Defendants receive notice of this action, it is highly likely that Defendants will transfer cryptocurrency at issue beyond the reach of discovery or recovery.

I am familiar with the process of providing notice via the deposit of airdropped or similar service tokens to cryptocurrency accounts, and in my experience, the method of notice proposed in the Proposed 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.

My name is Maya Vick, my date of birth is April 3, 1998, and my address is 151 Foundation Court, Mooresville, NC 28117. I declare under penalty of perjury the foregoing is true and correct.

Executed in Mooresville, Iredell County, North Carolina, on 10/14/2025.

DocuSigned by:

Maya Vick

452DFBCE7CEF49F...

Maya Vick

Maya Vick

Skilled with programming languages such as R, Python, HTML, SAS, SQL, Cypher, and Splunk. Experienced with programs such as Tableau and Tableau Prep Builder for data cleaning and visualization. Experience with cleaning, analyzing, visualizing, and evaluating financial and blockchain data on multiple platforms. Offers excellent communication and organizational abilities.

Contact

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LinkedIn
https://www.linkedin.com/in/maya-vick/

Software

R

Machine Learning, NLP, Datascience, Analysis, Visualization, Data Mining

Python

Machine Learning, Datascience, Analysis, Visualization

Tableau & Tableau Prep Builder

Visualization, Basic Data Analysis, Data Cleansing, Data Exploration

MS Office

Analysis, Organization, Linear Programming (Excel)

SQL

Data Management

SAS

Work History

2022-06 - Current

Data Analyst
Inca Digital
- Utilize Python, Neo4j, Cypher, AWS, and HTML to sup cryptocurrency data collection, visualization, analysis, a engineering.
- Analyze social media data, digital asset market data, a blockchain data to visualize and report custom insights Inca Digital clients.
- Data analysis for crypto threat intelligence reports for regulatory, law enforcement, and IC clients.

2021-12 - 2022-05

Intern
Managing Aquifer Recharge and Sustaining Groundwater through Village-level Intervention (MARVI), India & Australi
- Analyzed open source data to improve analytics dashb built primarily in Tableau.
- Collected, cleaned, and analyzed survey data on groundwater use.
- Optimized number of wells monitored in India using rec data.
- Managed Github with dashboard and visuals.

2021-06 - 2022-05

Graduate Assistant
Appalachian State University, Boone, NC
- Supported department members with financial data rese on a wide range of topics from macroeconomic analysis equities markets to cryptocurrency trading data analysis
- Gathered, reviewed, and summarized literature from sc journals such as JISAR and CONISAR to serve as refer for research papers.

Education

2021-05 - 2022-06

M.S: Applied Data Analytics, Interdisciplinary
Appalachian State University - Boone, NC
- Relevant Coursework Completed: Project Management Visualization. Unstructured Data Analytics. Blockchain Analytics. Web Analytics, Data Privacy, and Security.

Data Exploration, Analysis, Visualization

Certifications

Emerging Leaders Certification
Truist, 11/2021

IRB Member
CITI Program, 02/2022

SAS Visual Analytics 1 for SAS Viya: Basics
SAS, 11/2021

Crystal Expert Crypto Fundamentals (CECF)
Crystal Intelligence, 5/2025

Crystal Expert UTXO Investigator (CEUI)
Crystal Intelligence, 6/2025

Crystal Expert EVM Investigator (CEEI)
Crystal Intelligence, 6/2025

2016-08 - 2019-12

B.S: Mathematics

Appalachian State University - Boone, NC

- Concentration: Statistics
- Relevant Coursework Completed: Data Science. Time S
  & Forecasting. Operations Research. Statistical Analysi

Exhibit A

Binance
0x6E031365EBa4A48E47015aF708c943c2F119C52b
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804
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OKX
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ByBit
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KuCoin
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BloFin
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HTX
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Brenda Castillo on behalf of Andrew Golub
Bar No. 8114950
bcastillo@dowgolub.com
Envelope ID: 106916974
Filing Code Description: Amended Filing
Filing Description: Plaintiff's Verified First Amended Petition Application for Temporary Restraining Order, Temporary and Permanent Injunctions
Status as of 10/16/2025 12:47 PM CST

Case Contacts

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