IN THE CIRCUIT COURT OF WILL COUNTY, ILLINOIS
LAW DIVISION

DOUGLAS BUNKER, an individual, on behalf of himself and all others similarly situated	)	Case No.:
Plaintiff,	)	Hon. 2025MR000276
v.	)	
JANE DOE a/k/a AVA GARCIA and JOHN DOES 1-25,	)	
Defendants.		

COMPLAINT

NOW COMES Plaintiff, Douglas Bunker ("Plaintiff"), by and through his attorneys, ESBROOK P.C., and for his Complaint against Defendants Jane Doe a/k/a Ava Garcia and John Does 1-25 ("Defendants"), alleges as follows:

NATURE OF THE ACTION

1. Plaintiff brings this class action on behalf of himself and all others similarly situated to recover funds stolen from them through an insidious scheme known as "pig butchering."

2. This class action arises from a sophisticated online theft scheme commonly referred to as "pig butchering," in which scammers cultivate trust with unsuspecting victims, entice them to deposit funds in fraudulent cryptocurrency platforms, and ultimately abscond with the victims' hard-earned money and life savings. The scam is methodical, psychologically manipulative, and technologically deceptive. Plaintiff brings this action on behalf of himself and all other similarly situated victims.

3. Over the course of January and February 2025, Plaintiff was defrauded of approximately $384,311.30 by unidentified Defendants who engaged in a targeted campaign of

Initial case management set for 9/17/25 at: 9:15 a.m. **room 904**

deception and theft. The scope of the perpetrated "pig butchering" scam is vast and the harm it caused is deeply personal and financially devastating.

4. The term "pig butchering" refers to the scammers' strategy of "fattening up" the victim—coaxing increasingly large money deposits—before abruptly cutting off all communication and stealing the victims' funds. These scams often blend the cryptocurrency fraud with emotional manipulation. The scammers cultivate trust through friendships, promises of employment, or other forms of online social relationships. The scammers prey on human vulnerability while hiding behind layers of digital anonymity.

5. Defendants, whose real identities remain unknown, executed an organized campaign to scam Plaintiff and members of the class. In Plaintiff's case, Defendants first contacted Plaintiff via text message. The scammers posed as friendly recruiters, offering Plaintiff an interview for a job opportunity. Over the course of January and February 2025, Defendants developed a rapport with Plaintiff, promising him a job with a high earning potential.

6. Defendants gained Plaintiff's trust by promising him significant earnings. Plaintiff was to conduct work through what appeared to be a legitimate online cryptocurrency trading platform – wfgik.cc ("Wisdom Futures"). As part of the supposed training process for the job, Plaintiff was instructured to become familiar with Wisdom Futures, including making trades. This was designed to lure Plaintiff into depositing funds into an illegitimate trading platform under the guise of significant returns on trades.

7. Defendants also told Plaintiff that they had access to an algorithm which was able to predict with 95% certainty whether certain crytpocurrenty options would increase in price or decrease in price in a specified amount of time, thereby making the trades lucrative and enticing. And indeed, Wisdom Futures showed significant returns on trades that Plaintiff made.

8. These artificial returns on trades and the alleged algorithm, combined with ongoing encouragement from Defendants, led Plaintiff to deposit increasingly large amounts of cryptocurrency into Wisdom Futures. This platform continued to simulate gains, reinforcing the illusion that Plaintiff was indeed making successful trades, when in fact Plaintiff's cryptocurrency was being siphoned off to digital wallets controlled by Defendants.

9. When Plaintiff eventually attempted to withdraw a siginificant portion of his purported earnings, he was told that his account was suspected of money laundering and that he must first pay a "fund verification fee" to access his purported funds on the Wisdom Futures platform. These demands were further attempts to extract additional funds from Plaintiff.

10. Despite repeated attempts to withdraw his money, Plaintiff was unable to retrieve the majority of his funds and assets. Eventually, all communication ceased and the fake cryptocurrency trading platform became inaccessible. Defendants stole approximately $384,311.30 from Plaintiff. The same pattern of deceit has been reported by numerous victims around the country, indicating that this is not an isolated incident but part of a widespread, coordinated scam.

11. Plaintiff retained a forensic cryptocurrency expert, Inca Coalition ("Inca"), to trace the stolen funds and cryptocurrency on the blockchain. Each transaction was tied to a unique hash and tracked across various wallets, showing a consistent laundering pattern. The forensic trail shows that the same or similar individuals, entities, and digital infrastructure have been used to commit this techonogical scam against numerous others.

12. This scheme was intentionally designed to mimic legitimacy, from the user interface of the fake trading platform to the scripted responses of the scammers posing as potential employers. The result is widespread financial harm to Plaintiff and others similarly situated.

13. Plaintiff brings this class action pursuant to 735 ILCS 5/2-801 on behalf of all individuals who were similarly scammed. Plaintiff and the members of the Class, as defined further below, were subjected to the same scam tactics, suffered similar harms, and seek similar relief. The class members' claims share common issues of law and fact, including the use of fake trading platforms, emotional and psychological manipulation, misrepresentation of earnings, the inability to withdraw funds, and the laundering of assets via cryptocurrency wallets. A class action is the most efficient and fair means of adjudicating these claims.

14. This complaint seeks redress for the injuries caused and accountability for the individuals who perpetrated this scam.

THE PARTIES

15. Plaintiff is a an individual residing in Romeoville, Will County, Illinois.

16. Defendants are persons of unknown citizenship who perpetrated the wrongdoing alleged herein. Plaintiff will attempt to identify Defendants by name through discovery served on third parties with whom Defendants interacted.

JURISDICTION AND VENUE

17. The Court has personal jurisdiction over Defendants because the claims asserted herein arise in substantial part from Defendants' actions and scheme purposefully directed at Plaintiff in Illinois, and because the effects of Defendants' actions and scheme were felt from within Illinois by Plaintiff as a citizen and resident of Illinois. Jurisdiction, therefore, is properly laid in this Court.

18. Venue is proper in this Court under Section 2-101 of Illinois Code of Civil Procedure because a substantial part of the events giving rise to the claims occurred in Will County, where Plaintiff resides and was primarily targeted by Defendants' scheme.

CRYPTOCURRENCY BASICS

19. Virtual currencies, also known as cryptocurrency, are digital tokens of value circulated over the internet as substitutes for traditional fiat currency. Virtual currencies are not issued by any government or bank, like traditional fiat currencies such as the U.S. dollar, but are generated and controlled through computer software. BTC and Ethereum ("ETH") are the most well-known virtual currencies in use.

20. Virtual currency is tied to a virtual address. Virtual currency addresses are the virtual locations to which such currencies are sent and received. A virtual currency address is analogous to a bank account number and is represented as a string of alphanumeric characters. Like with bank accounts, one cannot send money to a virtual address without knowing the specific string of characters.

21. The identity of an address owner is generally anonymous (unless the owner opts to make the information publicly available), but analysis of the blockchain can sometimes be used to identify the owner of a particular address. The analysis can also, in some instances, reveal additional addresses controlled by the same individual or entity.

22. Each virtual currency address is controlled using a unique corresponding private key, a cryptographic equivalent of a password needed to access the address. Only the holder of an address' private key can authorize a transfer of virtual currency from that address to another address. A user of virtual currency can utilize multiple addresses at any given time and there is no limit to the number of addresses any one user can utilize.

23. Blockchain is used by many virtual currencies to publicly record all of their transactions. The blockchain is essentially a distributed public ledger, run by a decentralized network of computers, containing an immutable and historical record of every transaction that has

ever occurred utilizing that blockchain's specific technology. The blockchain can be updated multiple times per hour and record every virtual currency address that ever received that virtual currency. It also maintains records of every transaction and all the known balances for each virtual currency address. There are different blockchains for different types of virtual currencies.

24. Virtual currency wallet is a software application that interfaces with the virtual currency's specific blockchain and generates and stores a user's addresses and private keys. A virtual currency wallet also allows users to send and receive virtual currencies. Multiple addresses can be stored in a wallet.

25. Centralized Exchanges are digital platforms that facilitate the buying, selling, and trading of cryptocurrencies through a centralized organization that manages the platform and user funds. These exchnages operate similarly to traditional stock exchanges, acting as intermediariers between buyers and sellers. Examples of well know centralized exchanges include Binance, Coinbase, and Kraken.

26. While centralized cryptocurrency exchanges have enabled broader public access to digital asset markets, their rise has also coincided with the proliferation of fraudulent schemes that exploit consumer trust and the complexity of the blockchain-based transactions.

27. Phony exchanges promising outrageous returns have been established and continue to operate with the sole purpose of conning unsuspecting people out of their hard-earned money and life savings.

OVERVIEW OF THE PIG BUTCHERING EPIDEMIC

28. Plaintiff and the Class had their funds and cryptocurrency stolen as part of elaborate pig butchering scams. Defendants' conduct is not isolated or unique but rather a part of a vast and global network of criminal operations engaged in perpetrating these schemes.

A. How Pig Butchering Works

29. "Pig butchering" is a sophisticated and insidious scheme that involves cultivating a relationship with a targeted individual through deceptive means over time, with the ultimate goal of financial exploitation. 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 investigations and prosecution.[1]

30. Scammers typically initiate contact with victims through social media platforms, dating apps, or messaging services like WhatsApp. They pose as friendly or romantic interests, gradually building trust over weeks or months. Once a relationship is established, the scammer introduces the victim to a fraudulent investment opportunity, often involving cryptocurrency. Sometimes scammers pose as job recruiters. The scammers guide the victims to a fake cryptocurrency trading platform.[2]

31. The fraudulent cryptocurrency platforms are designed to appear legitimate, complete with professional-looking websites that include polished interfaces and dashboards that display fictitious returns and trading data. Victims are encouraged to make small initial investments, which seemingly yield significant profits. These apparent gains entice victims to invest larger sums.

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[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.

[2] In 2022, ProPublica published an in-depth investigation of pig butchering, describing how criminal syndicates operate, often by forcing human trafficking victims to perpetrate the schemes against their will. See Cezary Podkul, *What's a Pig Butchering Scam? Here's How to Avoid Falling Victim to One.* PROPUBLICA, Sept. 19, 2022, https://www.propublica.org/article/whats-a-pig-butchering-scam-hereshow-to-avoid-falling-victim-to-one.

32. As the victim continues to invest, the scammer may fabricate reasons to prevent fund withdrawals, such as additional fees for account verification or taxes. These fabrications are designed to prolong the scheme and extract more money from the victim. Eventually, the victim attempts to withdraw funds independently and discovers that the platform does not allow access to their balance or that customer support is non-responsive or non-existent. In some cases, the purported platform becomes inactive. At that point, the victim discovers that the investment platform is a sham, resulting in substantial financial loss.

33. The scale of pig butchering scams is staggering. According to the FBI's 2024 Internet Crime Report, Americans lost $9.3 billion to cryptocurrency scams in 2024 alone, with pig butchering being a significant contributor.[3]

34. Victims of pig butchering span all demographics but often include older adults and retirees seeking financial security. The emotional manipulation involved can lead to victims taking out loans and depleting life savings to invest in the fraudulent scheme and trading platforms.

35. Law enforcement agencies, including the FBI, have recognized the severity of pig butchering scams. In response, the FBI launched "Operation Level Up" in early 2024, identifying over 4,300 victims, 76% of whom were unaware they were being scammed at the time of contact.[4]

B. International Criminal Networks Conducting Pig Butchering Scams

36. Pig butchering schemes are frequently orchestrated by transnational criminal organizations based in Southeast Asia, particularly Myanmar, Laos, and Cambodia. These criminal

[3] *See* Federal Bureau of Investigations ("FBI") 2024 Crime Report https://www.ic3.gov/AnnualReport/Reports/2024_IC3Report.pdf
[4] *Id*.

groups operate with high degree of coordination, often using trafficked labor to target victims around the globe, including United States.[5]

37. The international crime syndicates operating these scams include but are not limited to the Chinese 14K Triad and the Karen Border Guard Force. Wan Kuok-Koi a/k/a "Broken Tooth" is a reputed Chinese mafia boss who has been sanctioned by the U.S. Government. He is the former head of the Chinese 14K Triad.[6] The 14K Triad is a criminal operation based in Hong Kong with ties to various scam compounds, such as KK Park, an online scam factory on Myanmar's border with Thailand.[7]

38. The Karen Border Guard Force ("KBGF") is a violent militia that controls much of Myanmar's border areas with China, Laos, and Thailand. The KBGF operates in Myanmar's Karen State and is headed by Colonel San Myint a/k/a Saw Chit Thu. The KBGF has overseen the development of numerous illegal casino operations, which are used as pig butchering scam compounds. The KGBF changed its name in 2024 to the Karen National Army ("KNA"). The KBGF/KNA is considered a "major node in a network of cyber scam centers . . . in Southeast Asia in which criminal groups are earning billions of dollars."[8]

39. Within the last year "offshoots of the Southeast Asian activity have emerged in the Middle East, Eastern Europe, Latin America, and West Africa. Many of these expanded operations … evolved in parallel to Chinese Belt and Road Initiative investments, the country's massive

[5] *See* https://www.pbs.org/newshour/show/how-human-trafficking-victims-are-forced-to-run-pig-butchering-investment-scams
[6] *See* https://www.wsj.com/world/china/china-mafia-broken-tooth-wan-kuok-koi-online-fraud-scam-70c09afb
[7] *See* https://www.dw.com/en/china-repatriates-hundreds-of-scam-factory-survivors/a-68408165
[8] *See* https://www.justiceformyanmar.org/stories/the-karen-border-guard-force-karen-national-army-criminal-business-network-exposed

international infrastructure and development initiative."[9] The pig butchering epidemic, thus, is no longer contained to Southeast Asia. Rather, it is a global epidemic now.

C. Off-Ramping Stolen Cryptocurrency

40. The ultimate goal of the scammers in pig butchering schemes is to "off-ramp" the stolen cryptocurrency—i.e., to convert it from traceable blockchain assets into fiat currency that can be freely spent or hidden outside the digital ecosystem. This conversion process often involves layering transactions through multiple wallets, mixing services, or foreign exchanges in order to obscure the origin of the funds. The end result is the placement of illicitly obtained crypto into the traditional financial system, a process functionally and legally akin to money laundering. By distancing the funds from their criminal origins through complex blockchain transactions, the perpetrators aim to make detection and recovery extremely difficult.

41. As part of the laundering process, cyber criminals deploy various techniques such as (1) exchange hopping - using multiple crypto exchanges to transfer funds across different platforms; (2) staggering –structuring transfers in a way that reduces detection risk by dispersing funds across multiple transactions, wallets, or time intervals; and (3) mixing or commingling-blending crypto from multiple sources to obscure the transaction history. Digital banks that offer banking-as-a-service (BaaS) in jurisdictions deficient in their anti-money laundering systems afford criminals the opportunity to "cloak" the stolen crypto by mixing it with legitimate funds.

42. Despite increased awareness and enforcement efforts, pig butchering scams continue to proliferate due to their sophisticated nature and the anonymity afforded by digital platforms and cryptocurrencies. The combination of emotional manipulation and financial deception makes these scams particularly devastating.

[9] *See* https://www.wired.com/story/pig-butchering-scam-invasion/

DEFENDANTS LURE PLAINTIFF

43. In or around January 2025, Plaintiff was approached via a text message by a Defendant identifying herself as Ava Garcia ("Garcia") who claimed to reside in Los Angeles, California.

44. At that time, Plaintiff was recently terminated from his job at AT&T because his job position was relocated from Chicago, Illinois to Dallas, Texas. To that end, Plainitff was actively searching for employment.

45. Garcia presented herself as a member of a firm called Blockfi and offered Plaintiff a potential employment opportunity with the company. After communicating via text messages for a few days, Garcia asked Plaintiff to communicate via WhatsApp.

46. Blockfi was a cryptocurrency lending and trading platform that allowed users to earn interest on crypto deposits and take out crypto-backed loans.

47. In November 2022, Blockfi filed for Chapter 11 bankruptcy protection, citing significant exposure to the collapse of the FTX exchange.[10] Blockfi halted withdrawals and eventually shut down its web platform in May of 2024.

48. In October of 2023, Blockfi emerged from bankruptcy and announced plans to wind down all remaining operations, including returning crypto assets to customers.

49. Garcia represented to Plaintiff that she wanted to relaunch Blockfi. In connection with this, Garcia offered Plaintiff a job with Blockfi as a Capital Planning and Strategy Manager. This position purportedly provided a $320,000 annual salary.

[10] The FTX collapse was triggered by revelations that the company had misused customer assets and funds to cover losses at its sister firm, Alameda research. Users rushed to withdraw their funds, leading to a liquidity crisis and FTX's bankruptcy.

50. In connection with this purported job offer, Garcia directed Plaintiff to Wisdom Futures, which allegedly served as a platform for cryptocurrency trading. According to Garcia, the platform would allow Plaintiff to become familiar with digital asset markets and trading mechanisms in preparation for his employment. Garcia showed Plaintiff how to make trades on the platform.

51. Garcia represented that Wisdom Futures provided the opportunity to trade options on BTC, specifically through a method known as binary options trading. In this model, participants are required to predict the directional movement of BTC's price within a set time frame — whether the price would move up or down. Garcia further claimed that Blockfi had access to an algorithm that enabled it to "time the market" with precision, boasting a 95% trade success rate on the Widsom Futures platform.

52. Garcia informed Plaintiff that successful trades on the platform typically resulted in returns of approximately 30% of the invested amount. Relying on these representations, Plaintiff proceeded to engage in trading activity on the Wisdom Future's platform under Garcia's direction and guidance.

53. In order to fund the trades, Plaintiff pulled funds out of his retirement accounts and deposited these funds into his checking account. From his checking account, Plaintiff transferred the funds into his Coinbase account. On Coinbase, Plaintiff bought crypto and transferred it into his Future Wisdom account.

54. Over the course of his involvement in January and February 2025, Plaintiff invested a total of approximately $384,311.30 worth of cryptocurrency assets into the Wisdom Futures platform. These funds were deposited in multiple transactions and were represented to be actively

traded on his behalf. According to the account statements presented by Wisdom Futures, Plaintiff's balance eventually grew to over $1.6 million.

55. On February 22, 2025, Plaintiff was able to initiate a successful withdrawal of approximately $30,000, which was deposited into his Coinbase account. He also made several smaller withdrawals during this period. These initial transactions were presented as proof of the platform's legitimacy and used to further encourage Plaintiff to increase his investment.

56. Subsequently, when Plaintiff attempted to make a larger withdrawal, he was informed by customer service representatives of the platform that he was required to pay a "blockchain fee" equal to 10% of his alleged earnings. Plaintiff paid this fee.

57. Thereafter, after attempting another large withdrawal, Plaintiff was told that his account had been flagged for suspected money laundering activity, and that he would need to pay a "fund verification fee" of an additional 10% fee in order to unfreeze and access his funds. Plaintiff did not pay this fee as he was unable to withdraw more funds from his retirement accounts.

58. At no point did Wisdom Futures provide any legitimate justification or supporting documentation for these purported fees, nor were any of the remaining funds ever returned to Plaintiff.

59. Between January and February 2025, Plaintiff transferred a total of $384,311.30 across 12 transactions to Wisdom Futures, which was a platform controlled by Defendants. In reality, these deposits went into wallets controlled by Defendants. The table below details all transactions made by Plaintiff:

No.	Date/Time	From Exchnage	From Address	To Address	Asset Type	Asset Amount	USD Equivalent
1.	01/14/2025 16:39	Coinbase	0xc98aa55347C821 4EF4909fc841BC5d13ba9faf27	0x22e3De95d1ea074a44ED6c7c1Db13ca983fFB407	ETH	1.583715410950256	$5,067.25
2.	01/16/2025 21:05	Coinbase	0xc98aa55347C821 4EF4909fc841BC5d13ba9faf27	0x77D2d74d686FA26a894F21A678c40C9E352315A7	ETH	1.47321286502486	$4,916.78
3.	01/28/2025 00:50	Coinbase	0xc98aa55347C821 4EF4909fc841BC5d13ba9faf27	0x77D2d74d686FA26a894F21A678c40C9E352315A7	ETH	4.515411398031155	$14,367.79
4.	02/10/2025 22:08	Coinbase	0xc98aa55347C821 4EF4909fc841BC5d13ba9faf27	0x4Ffe51E288B252ad7F0029eC465abD3B317360e3	ETH	7.243779451311856	$19,309.84
5.	02/12/2025 23:19	Coinbase	0xc98aa55347C821 4EF4909fc841BC5d13ba9faf27	0x4Ffe51E288B252ad7F0029eC465abD3B317360e3	ETH	0.001815877304802269	$4.99
6.	02/13/2025 00:23	Coinbase	0xc98aa55347C821	0x4Ffe51E288B25	ETH	7.195653243688424731	$19,709.03

			4EF490 9fc841B C5d 13ba9faf 27	2ad7F00 29eC465 a bD3B317 360e3			
7.	02/14/2025 20:17	Coinbase	0xc98aa 55347C 821 4EF490 9fc841B C5d 13ba9faf 27	0x4Ffe51 E288B25 2ad7F00 29eC465 a bD3B317 360e3	ETH	21.6587359 73215153	$59,327.47
8.	02/18/2025 19:30	Coinbase	0xc98aa 55347C 821 4EF490 9fc841B C5d 13ba9faf 27	0x4Ffe51 E288B25 2ad7F00 29eC465 a bD3B317 360e3	ETH	37.6190557 6170038	$98,996.97
9.	02/24/2025 23:11	Coinbase	0xA9D1 e08C77 93af 67e9d92 fe308d5 697 FB81d3 E43	0x57cE0 3Bc8060 8 57E6cA7 565112d 9 c37C3db 02f0d	USDT	25.0041	$25.01
10.	02/25/2025 14:15	Coinbase	0xA9D1 e08C77 93af 67e9d92 fe308d5 697 FB81d3 E43	0x4Ffe51 E288B25 2ad7F00 29eC465 a bD3B317 360e3	ETH	10.10248691	$24,382.33
11.	02/25/2025 15:41	Coinbase	0xA9D1 e08C77 93af 67e9d92 fe308d5 697 FB81d3 E43	0x57cE0 3Bc8060 8 57E6cA7 565112d 9 c37C3db 02f0d	ETH	0.15862414	$377.15

12.	02/25/2025 01:18	Coinbase	0xA9D1e08C7793af67e9d92fe308d5697FB81d3E43	0x57cE03Bc80608 57E6cA7565112d9 c37C3db02f0d	USDT	137,807	$137,826.69

DEFENDANTS CONVERT PLAINTIFF AND CLASS MEMBERS' ASSETS

60. As stated, Plaintiff engaged Inca in order to conduct a forensic analysis to trace the disposition of Plaintiff's BTC deposits.

61. Inca's investigation revealed that Defendants used Wisdom Futures to convert Plaintiff and Class Members' funds and assets, and then sent those assets and funds through a web of transactions designed to hide their trail. Inca has traced and connected Defendants' transactions, found and followed a trail of transactions, and identified the cryptocurrency wallets that hold Plaintiff and Class Members' funds. Inca's investigation found that Plaintiff and Class Members sent funds from accounts at the following sources and cryptocurrency exchanges: Coinbase.

A. Inca's Methodology

62. Inca Digital's forensic tracing process follows a structured two-phase methodology to reconstruct the movement of stolen assets. This process identifies key wallet types that play distinct roles in the laundering scheme:

a. **Intake Wallet**: The first address provided to the victim for depositing funds into the scam. Intake Wallets are controlled by Defendants and serve as the entry point for misappropriated assets before further movement through laundering pathways (hereinafter referred to as "Intake Wallet").

b. **Pivot Wallet**: An address that consolidates stolen funds from multiple victims before dispersing them to final deposit addresses. These wallets obscure the original

source of funds and facilitate layering to evade detection. Identifying Pivot Wallets is critical in tracing structured laundering patterns (hereinafter referred to as "Pivot Wallet").

c. **Deposit Wallet**: A cryptocurrency wallet assigned to a user account on a centralized exchange. These wallets serve as deposit points where funds are sent before potential withdrawal, liquidation, or further movement (hereinafter referred to as "Deposit Wallet").

63. The forensic tracing process consists of two phases, each of which is precise, reliable, and replicable: Forward Tracing, which follows stolen assets from their initial destination through intermediary transactions to their final locations, and Reverse Tracing, which traces back from the final deposit points to uncover additional victims and the broader extent of the scam.

64. Forward Tracing tracks stolen funds through intermediary transactions to Deposit Wallets. It identifies key laundering techniques, including Intake Wallet transfers, Pivot Wallet aggregation, partial splits, layering transactions, and rapid transfers used to disguise fund origins. Pivot Wallets act as collection points where multiple victims' funds are pooled before further redistribution. These wallets are commonly used in laundering schemes to break the direct trace between stolen assets and their final destinations.

65. Reverse Tracing involves tracing back from Deposit Wallets to confirm they received funds from multiple unrelated victim wallets, establishing the structured nature of the laundering process. Inca traces back from Pivot Wallets to identify additional victims whose assets were commingled before further movement. This process confirms the extent of the scheme by analyzing how widely dispersed stolen funds became before reaching their final destinations.

B. Tracing the Movement of Plaintiff's Funds

66. As discussed above, Plaintiff made 12 different transaction between January 14, 2025 and February 25, 2025. Plaintiff transferred a total of $384,311.30 to Intake Wallets – the first known scam-controlled addresses where Defendants directed Plaintiff to send assets.

67. From these wallets, Defendants systematically moved funds through a series of additional transactions until they reached Deposit Wallets. In total, Plaintiff sent funds to four different Intake Wallets:

a. **Intake Wallet #1:** 0x22e3De95d1ea074a44ED6c7c1Db13ca983fFB407

b. **Intake Wallet #2:** 0x77D2d74d686FA26a894F21A678c40C9E352315A7

c. **Intake Wallet #3:** 0x4Ffe51E288B252ad7F0029eC465abD3B317360e3

d. **Intake Wallet #4:** 0x57cE03Bc8060857E6cA7565112d9c37C3db02f0d

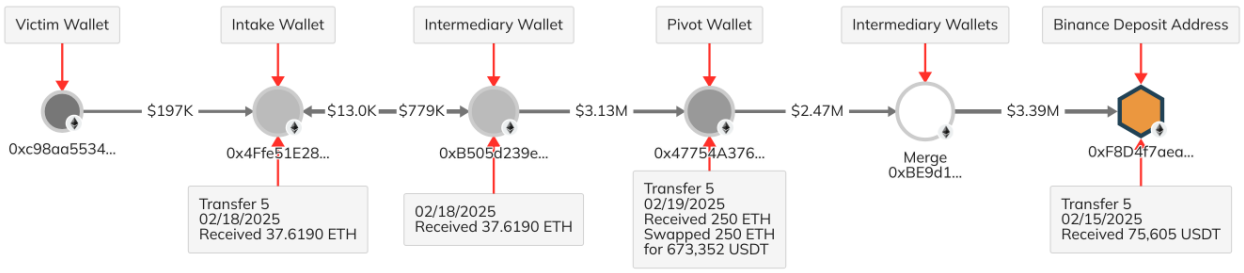
68. Plaintiff's funds were routed through intermediary wallets, including Pivot Wallets, where they were combined, split, and transferred across multiple additional addresses. These structured movements demonstrate an intent to break direct transaction links, disrupt traceability, and hinder asset recovery. The assets were ultimately deposited into Deposit Wallets.

69. In this case, Inca's forensic analysis identified two Pivot Wallets where the misappropriated funds were consolidated: (1) 0xc15d381cc41e0cAF2e9fccD0443BA4aDc747225a and (2) 0x47754A3763a398B33078589C7faf5d9D6aA4D7C1.

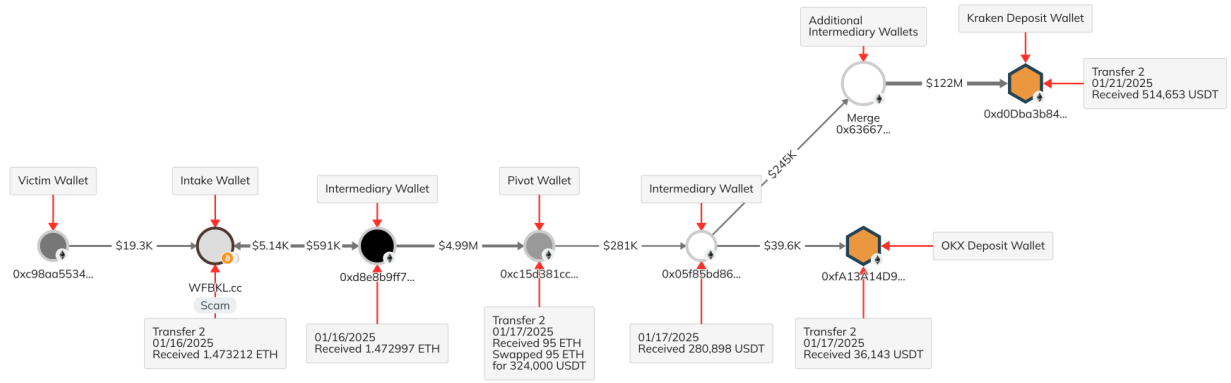
70. Forensic blockchain analysis confirms that Plaintiff's funds were systematically routed through transaction pathways designed to obscure their origin.

71. Inca's forensic analysis identified one pathway that traced Plaintiff's funds. This involves a direct transfer where funds moved from Intake Wallets to the Pivot Wallet to the Deposit Wallets without additional intermediary steps.

72. Pathway 1 involves the transfer of funds from Pivot Wallets through one or more Intermediary Wallets before reaching Deposit Wallets. While funds from the majority of transfers follow Pathway 1, three transfers deviated from this pattern, branching off to include additional Intermediary Wallets or alternate Deposit Wallets. The standard Pathway can be visualized as follows:



73. The three transfers that deviated from the traditional pathway can be visualized as followed:



74. Each of these deviations initially mirrors Pathway 1 but branches off from the final Intermediary Wallet in the standard pathway, routing a portion of funds to additional intermediary wallets and or an alternative Deposit Wallet.

D. Tracing the Movement of Class Members' Funds

75. Forensic blockchain analysis confirms that the theft of Plaintiff's assets was not an isolated incident but part of a systematic fraud scheme, structured to obscure transaction origins and facilitate large-scale misappropriation of cryptocurrency.

76. The same Pivot Wallets that received Plaintiff's funds also show structured inflows from multiple unrelated wallets following similar transaction patterns, confirming their role as collection points in a broader fraud network.

77. Pivot Wallets are essential to identifying the affected group or class of victims because they establish that multiple victims' funds were controlled by the same bad actor or group. These wallets function as aggregation points where stolen funds from numerous victims converge, demonstrating a systematic, coordinated scheme.

78. By consolidating funds from unrelated victims into a single location, Pivot Wallets establish a centralized point of control, linking disparate victims to a unified fraudulent operation.

79. By tracing inflows into known the Pivot Wallet, Inca identified approximately 78 additional victim wallets whose transactions followed the same structured fund movement patterns as Plaintiff's transactions. These wallets exhibited identical laundering behaviors:

a. **Matching structured transaction pathways** observed across multiple victims, following the same laundering techniques;

b. **Pivot Wallet aggregation**, confirming that multiple victims' funds were pooled in the same intermediary wallets before onward movement;

c. **Consistent transaction behaviors** across victims, reinforcing the presence of a coordinated fraud operation.

80. Estimated total class-wide losses are approximately $18,600,775 based on cumulative victim deposits into the identified Pivot Wallet. Approximately $8,139,009.77 in total was transferred from the identified Pivot Wallet to Deposit Wallets.

81. The following Deposit Wallets represent the last known locations where misappropriated assets were traced. Forensic blockchain analysis confirms that these wallets were used in structured laundering processes, and the stolen funds remain at imminent risk of further dissipation beyond recovery:

Exchange	**Wallet Address**
Binance	0xF8D4f7aea1f91E9db99499CBc3319c3572fa7844
Kraken	0xd0Dba3b846964963035eb3Bc343E1e378e41Dff3
OKX	0xfA13A14D924CfDaDa358AD2b85B17f7d5282C6bB
B2C2	0xa29E963992597B21bcDCaa969d571984869C4FF5
Big.ONE	0xD4Dcd2459BB78d7a645Aa7E196857D421b10D93F
Bitkub	0x9F828ff3552B805E4781c47153f476d722080bF1
Huione Pay	0xEe674c4Bb8a8A7946353AaA7245A9F6054c4e34F

CLASS ALLEGATIONS

82. This action may be properly maintained as a class action under Illinois law. Plaintiff, therefore, files this as a class action on behalf of himself and the following class:[11]

> all persons and entities who, at the suggestion of the scammers or individuals acting under the scammers' instruction or control, transferred cryptocurrency into one or more of the cryptocurrency wallets identified in Appendix A and other scam wallet addresses as may be identified during discovery.

[11] Plaintiff reserves the right to modify the Class Definition at the class certification stage or as otherwise instructed by the Court.

83. Excluded from the Class are the Court and its personnel and the Defendants and their officers, directors, employees, affiliates, legal representatives, predecessors, successors and assigns, and any entity in which any of them has a controlling interest.

84. The members of the Class are so numerous that joinder is impracticable.

85. Common questions of law and fact are apt to drive resolution of the case, exist as to all members of the Class, and predominate over any questions affecting solely individual members of the Class including, but not limited to, the following:

a. Whether the Defendants unlawfully obtained the Plaintiff's and Class Members' cryptocurrency;

b. Whether Defendants had a legal right to acquire Plaintiff's and Class Members' cryptocurrency;

c. Whether Defendants were unjustly enriched as a result of the transfer of the Plaintiff's and Class Members' cryptocurrency;

d. Whether Defendants received from Plaintiff and the Class Members money and property;

e. Whether Defendants withheld and converted to themselves the assets and property of Plaintiff and Class Members in a manner inconsistent with their property rights in those assets;

f. Whether Plaintiff and Class Members have been deprived of the use of their assets and damaged as a result;

g. Whether Defendants knew or should have known they received money wrongfully obtained from Plaintiff and Class Members through unlawful conduct including but not limited to theft, or conversion;

h. Whether Defendants unfairly benefited by keeping the Plaintiff's and Class Members' funds at issue;

i. Whether Defendants' retention of the Plaintiff's and Class Members' assets is inequitable;

j. Whether Defendants' receipt and retention of the Plaintiff's and Class Members' funds in question caused Plaintiff and the Class Members financial harm; and

k. Whether Defendants acted with oppression, fraud, and malice, and with actual and constructive knowledge that the Plaintiff's and Class Members' assets were wrongfully converted by Defendants for their own personal use and without the knowledge of or approval by Plaintiff or the Class Members

86. Plaintiff's claims are typical of the claims of other Class Members, as all members of the Class were similarly affected by Defendants' wrongful conduct in violation of law, as complained of herein.

87. Plaintiff will fairly and adequately protect the interests of the Class Members and has retained counsel that is competent and experienced in class action litigation. Plaintiff has no interests that conflicts with, or is otherwise antagonistic to, the interests of other Class Members.

88. A class action is superior to all other available methods for the fair and efficient adjudication of this controversy since joinder of all members is impracticable. Further, as the damages that individual Class Members have suffered may be relatively small, the expense and burden of individual litigation make it impossible for Class members to individually redress the wrongs done to them, especially given the complex and convoluted details of the scheme at issue. There will be no undue difficulty in management of this action as a class action.

COUNT I – CONVERSION

89. Plaintiff realleges and incorporates herein by reference the foregoing paragraphs as though fully set forth herein.

90. At all times relevant, Plaintiff had a lawful right to possess the funds and assets transferred to the Wisdom Futures platform as described above. These funds and assets were Plaintiff's personal property.

91. Plaintiff retained an absolute and unconditional right to the immediate possession of these funds and assets. At no point did Plaintiff intend to relinquish ownership of these funds permanently, nor did he authorize their conversion to another person's use outside the context of the promised cryptocurrency investment returns and withdrawals.

92. Plaintiff made multiple demands for the return and withdrawal of these funds, each of which was denied or ignored by Defendants through false representations, fabricated fees, or a complete cessation of communication.

93. Defendants wrongfully and without authorization assumed control, dominion, and ownership over Plaintiff's funds and assets by transferring them from Plaintiff's accounts into digital wallets controlled exclusively by Defendants, without any intent to return the funds and without legal justification.

94. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered financial losses in excess of $384,311.30, exclusive of interest, attorneys' fees, and costs and total classwise losses are estimated at $18,600,775.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment in its favor and for the following relief:

i. Compensatory and punitive damages in an amount to be determined at trial;

ii. Pre- and post-judgment interest;

iii. Attorney's fees and cost, as allowable by law; and

iv. Any additional relief that this Court deems equitable and just.

COUNT II – UNJUST ENRICHMENT

95. Plaintiff realleges and incorporates herein by reference the foregoing paragraphs as though fully set forth herein.

96. Plaintiff transferred substantial funds, totaling in excess of $384,311.30, to what he was led to believe was a legitimate work platform promoted and controlled by Defendants.

97. These funds were obtained by Defendants and/or entities controlled by them through misrepresentations and deceptive practices, including false claims about trade returns, withdrawal procedures, and the legitimacy of the Wisdom Futures platform.

98. Defendants retained the benefit of these funds, either by personally converting the funds, transferring them to Deposit Wallets under their control, or otherwise gaining economic benefit at Plaintiff's expense.

99. Plaintiff received no actual returns on his cryptocurrency deposits into Wisdom Futures, nor was he permitted to withdraw the funds. The entire structure of the transaction was a scheme designed to unjustly enrich the Defendants at Plaintiff's direct financial detriment.

100. Defendants' retention of these funds violates fundamental principles of justice, equity, and good conscience. It would be inequitable to allow Defendants to retain the benefit of Plaintiff's funds under these circumstances.

101. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered financial losses in excess of $384,311.30, exclusive of interest, attorneys' fees, and costs and total classwise losses are estimated at $18,600,775.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment in its favor and for the following relief:

i. Compensatory and punitive damages in an amount to be determined at trial;

ii. Pre- and post-judgment interest;

iii. Attorney's fees and costs, as allowable by law; and

iv. Any additional relief that this Court deems equitable and just.

COUNT III - REPLEVIN

102. Plaintiff realleges and incorporates herein by reference the foregoing paragraphs as though fully set forth herein.

103. Plaintiff is the rightful owner of, or lawfully entitled to the immediate possession of, certain personal property consisting of funds and assets totaling approximately $384,311.30, which were transferred to Defendants, via Wisdom Futures, under false pretenses and are now wrongfully detained by Defendants or their agents.

104. These funds are traceable and identifiable as cryptocurrency assets that Plaintiff deposited into what he was led to believe was a legitimate work platform promoted, controlled, or operated by Defendants.

105. Defendants are wrongfully detaining this property without legal justification and have refused to return it to Plaintiff despite repeated demands. Plaintiff's right to the funds is superior to that of Defendants, and he seeks recovery based on the strength of his own title and entitlement to immediate possession.

106. Upon information and belief, the property in question has not been taken for any tax, assessment, or fine levied under any law of this State against Plaintiff, nor has it been seized

under any lawful process against Plaintiff's goods and chattels, nor is it held by virtue of any order for replevin against Plaintiff.

107. Defendants' continued possession of the property constitutes unlawful detention and deprives Plaintiff of the use, benefit, and value of his funds.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment in its favor and for the following relief:

i. Return of the stolen funds;

ii. Pre- and post-judgment interest;

iii. Attorney's fees and costs, as allowable by law; and

iv. Any additional relief that this Court deems equitable and just.

COUNT IV – DECLARATORY RELIEF

108. Plaintiff realleges and incorporates herein by reference the foregoing paragraphs as though fully set forth herein.

109. Plaintiff has a clear, legally protectable, and tangible interest in the funds and assets he transferred, totaling in excess of $384,311.30, which he believed were being deposited into a legitimate work platform operated and promoted by Defendants.

110. Defendants, by fraudulently inducing Plaintiff to transfer said funds and subsequently assuming control and ownership over them, assert an adverse and opposing interest in the funds, which is in direct conflict with Plaintiff's right to immediate possession and control.

111. An actual and ongoing controversy exists between the parties concerning their respective rights to the funds and assets, which are traceable to the Deposit Wallet addresses and other digital accounts associated with Defendants. Plaintiff seeks a judicial declaration to resolve this dispute and to confirm his entitlement to restitution of the full amount of funds he deposited.

112. The controversy is not moot, hypothetical, or premature. It involves a concrete dispute over the ownership of specific funds and does not seek an advisory opinion or a determination based solely on future or abstract events.

113. Declaratory relief is appropriate and necessary to clarify and affirm Plaintiff's legal rights and interests with respect to the misappropriated funds.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment in his favor and for the following relief:

i. Declaration that Plaintiff is entitled to funds he deposited into the Wisdom Futures platform promoted by Defendants;

ii. Attorney's fees and costs; and

iii. Any additional relief that this Court deems equitable and just.

Respectfully submitted,

/s/ Michael Kozlowski
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APPENDIX A

Pivot Wallets

1. 0xc15d381cc41e0cAF2e9fccD0443BA4aDc747225a
2. 0x47754A3763a398B33078589C7faf5d9D6aA4D7C1