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17 Attorneys for Plaintiff
18 YOUNES YOUNES

19
20 SUPERIOR COURT OF THE STATE OF CALIFORNIA
21
22 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

23
24 YOUNES YOUNES, on behalf of himself and
25 all others similarly situated,

26 Plaintiff,

27 v.

28 ELVIRA TAYLOR and DOES 1 through 200
inclusive,

29 Defendants.

30 Case No. 24STCV12520

31
32 **DECLARATION OF YOUNES YOUNES**
33 **IN SUPPORT OF ENTRY OF**
34 **JUDGMENT**

1 I, Younes Younes, swear under penalty of perjury as follows:

2 1. I am the plaintiff in this action. I make the following declaration based
3 on my personal and firsthand knowledge, and if called and sworn as a witness, I
4 could and would testify competently to each of the facts set forth herein.

5 2. I am an individual who currently and at all relevant times herein
6 resides in the city of Palmdale, California. All of the following events set forth herein
7 took place in Los Angeles County, California.

8 3. I am the victim of a scam artist who used the name Elvira Taylor to
9 deliberately steal over \$400,000 from me. I subsequently realized that I was the
10 victim of a classic “pig butchering” scheme.

11 4. On or about January 5, 2024, a person using the number (803) 962-3077
12 contacted me via WhatsApp claiming to be a job recruiter and asking whether I
13 would be interested in obtaining part-time work online. The following day, I was sent
14 instructions through WhatsApp by a person claiming to be named “Elvira Taylor.”
15 Taylor represented she was located in Miami and that I could receive income through
16 a standardized online work platform. Taylor represented to me that payments for
17 my work would be sent in cryptocurrency.

18 5. I subsequently began performing work on the online platform and
19 earned substantial alleged amounts due to me. But when I tried to withdraw my
20 work earnings, Taylor told me that I would be required to maintain a certain level
21 of deposits on the online platform and to make specified “recharge” payments, via
22 cryptocurrency on the platform, before I would be permitted to withdraw the full
23 amount of money owed to me.

24 6. Based upon the repeated and express representations and instructions
25 by Taylor, I purchased and transferred over \$400,000 in cryptocurrency to the online
26 platform. I did not know that the platform that Taylor had instructed me to transfer
27 these funds to was actually in her control, and was not a legitimate online platform.

28

1 7. Everything that Taylor told me was a lie. The online platform was fake,
2 there was no actual work available or payments to be made, and the entire scheme
3 was deliberately designed to entice me to deposit money into accounts, as I did, which
4 was then stolen by Taylor.

5 8. After realizing the “work platform” to which he had been enticed was a
6 scam, and his money stolen, I contacted Inca Digital (“Inca”), a cryptocurrency
7 investigation firm, which traced my transactions and confirmed that Taylor had
8 stolen my money and transferred it into particular cryptocurrency wallets that
9 Taylor controlled. After filing the present lawsuit, those cryptocurrency wallets that
10 contained Taylor’s stolen funds were subsequently frozen by this Court, and remain
11 frozen at this time.

12 9. I subsequently realized, after investigation, that Taylor's fake online
13 work scheme was a version of "pig butchering," which is a type of cryptocurrency
14 theft, and that pig butchering victims in the United States (like me) have lost billions
15 of dollars as a result.

16 10. Taylor stole over \$400,000 from me by promising me money in return
17 for my work and then fabricating evidence of positive performance and accounts on
18 her fake website. To entice me to deposit this money, she lied to me about the
19 requirement that I deposit funds in order to access that millions of dollars that I had
20 allegedly earned. Once she had “fattened me up” by taking my money, she simply
21 closed the online platform, stole my money, and never contacted me again.

22 11. The \$400,000 that Taylor stole from me was my entire life savings. As
23 a result of her theft, my family and I lost our home, and have been emotionally
24 devastated. I have not been able to recover a single penny of the \$400,000 that Taylor
25 stole from me. Although the Court has frozen the cryptocurrency wallets that contain
26 the money stolen by Taylor from me and other victims, we have not yet been able to
27 access those frozen amounts, and require entry of a judgment before we can do so.

1 12. As a result of Taylor's conduct and her theft of my life savings, my
2 family and I have suffered extreme emotional distress and financial hardship. It is
3 difficult for me to sleep at night. I constantly worry about my finances and the
4 uncertain future of my family. I feel incredibly stupid at having been duped by
5 Taylor, and was forced to tell my wife and family how much I injured them and
6 harmed their welfare by stupidly trusting Taylor and her lies.

7 13. I request the following damages from Taylor, each of which was set
8 forth in the Verified Complaint that was filed in this action and properly served on
9 her and which formed the basis for the Clerk's entry of default against her:

10 Lost Money Directly Stolen By Taylor: \$400,000
11 Punitive Damages (5x Compensatory Damages): \$2,000,000
12 Total Requested Damages: \$2,400,000

13 14. The compensatory damages that I request are a small portion of my
14 actual losses, and I understand that the amounts recoverable in the wallets frozen
15 by this Court may well be insufficient to compensate me for my actual losses;
16 nonetheless, I would like to recover as much as I can in order to attempt to remedy
17 the incredible harm that Taylor has done to me and my family.

20 I declare under penalty of perjury under the laws of the State of California
21 that the foregoing is true and correct.

Executed on January 10, 2026, at Los Angeles, California.

Younes Younes