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David W. Slayton,
Executive Officer/Clerk of Court,
By D. Jackson Aubry, Deputy Clerk

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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

13
14 YOUNES YOUNES, on behalf of
15 himself and all others similarly
16 situated,

17 Plaintiff,

18 v.

19 ELVIRA TAYLOR and DOES 1
20 through 200, inclusive,

21 Defendants.

Case No. 24STCV12520

**DECLARATION OF CHARLES
ZACH IN SUPPORT OF
PLAINTIFF'S *EX PARTE*
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND OSC
RE: PRELIMINARY INJUNCTION**

Assigned for All Purposes to:
Judge: The Hon. Elihu Berle
Date: June 12, 2024
Time: 8:30 a.m.
Place: 312 N. Spring Street, Los
Angeles, CA 90012, Dept. 6

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

2 1. My name is Charles Zach. I am an employee at Inca Digital, a company
3 that investigates cryptocurrency schemes, including “pig butchering.” As part of my
4 employment at Inca Digital, I have investigated matters related to the complaint by
5 Younes Younes (“Plaintiff”) in the above-captioned action. I am over 18 years of age,
6 of sound mind, and am competent to make this Declaration. The evidence set forth in
7 the foregoing Declaration is based upon my personal knowledge unless expressly stated
8 otherwise, and if called and sworn as a witness, I could and would testify to each of the
9 facts set forth herein.

10 2. Inca Digital is a digital asset intelligence company that provides data,
11 analytics, and expertise to many of the world's leading exchanges, financial institutions,
12 regulators, and government agencies. Inca Digital's clients use its unique and
13 comprehensive intelligence to surveil digital asset markets, fight crime, generate alpha,
14 and more. For more information about Inca Digital and our work, please visit:
15 <https://inca.digital/>.

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

21 4. I understand that this class action is brought to freeze wallets containing
22 class member funds that Defendants converted and return these funds to class member
23 victims. Based on Inca’s investigation to date, Defendants conversion scheme involved
24 more than 400 class member victims, who lost approximately \$3.7 million.

25
26 ¹ See FinCEN Alert of Prevalent Virtual Currency Investment Scam Commonly
27 Known as “Pig Butchering,” U.S. Treasury Financial Crimes Enforcement
28 https://www.fincen.gov/sites/default/files/shared/FinCEN_Alert_Pig_Butchering_FINAL_508c.pdf.

1 5. Through my investigation, I discovered that Defendants attempted to
2 conceal their conversion of the cryptocurrency of the members of the class through a
3 series of online transactions designed to hide their trail. However, to date, an
4 investigation by Inca has been able to trace and connect Defendants' transactions,
5 follow the trail, and identify several of the cryptocurrency wallets that held and/or hold
6 the cryptocurrency funds of Mr. Younes and members of the class.

7 6. Inca's investigation involved two phases, each of which is precise, reliable
8 and replicable, as set forth below. First, in phase one, Inca "forward traced" funds from
9 Plaintiff's deposit of cryptocurrency with Defendants to other wallets. Subsequently, in
10 phase two, Inca "reverse traced" the flow of funds into the above addresses and
11 determined that additional addresses matched Plaintiff's flow of funds as part of a
12 common scheme involving other members of the class.

13 7. Inca's "forward tracing" was based on a three-step analysis: (1) identifying
14 the addresses that initially received Plaintiff's cryptocurrency; (2) tracking the transfer
15 of funds from those addresses to two "swap router and bridge" addresses and then
16 through a series of transactions on the TRON blockchain, and (3) tracking those funds
17 through a series of wallet addresses to the "Deposit Addresses" set forth in Paragraph
18 22. (A "blockchain" is a system used to record cryptocurrency transactions.)

19 8. First, Inca analyzed screenshots provided by the victim and identified the
20 two addresses to which Plaintiff initially sent cryptocurrency. Both of these addresses
21 below are on the Ethereum blockchain for Ethereum, a common cryptocurrency. These
22 addresses are:

23 0x49f8B7feEE8C0B85ff61F2d7c38Af809614515Df

24 0x64E5f1a2480a3967EDD30b0b400Daf18422cE552

25 9. Second, Inca analyzed transfers from these two addresses and found that
26 funds were routed to two "swap router and bridge" addresses. A "swap router and
27 bridge" address is a kind of aggregator that is used to combine funds and convert them
28 to a different cryptocurrency. In this case, the "swap router and bridge" addresses were

called “SWFT.PRO” and “OKX DEX Aggregation” and they were used to convert funds to a different cryptocurrency (known as “USDT”), which was transferred to the TRON blockchain. These two addresses are:

0x92e929d8B2c8430BcAF4cD87654789578BB2b786 (SWFT.PRO)

0xFc99f58A8974A4bc36e60E2d490Bb8D72899ee9f (OKX DEX Aggregation)

10. Third, Inca analyzed the subsequent transfer of funds on the TRON blockchain and determined they were routed through a series of wallet addresses, commingled, and then deposited at the “Deposit Addresses” set forth herein. The Deposit Addresses are categorized by cryptocurrency exchange (OKX and Binance):

OKX

- TXPiHTvpCzFTEvh5SkbwUuSuty2AfigdcY

- TKcqHtVbF11ZhsqxYaBpYQ9tdEQ9RTXWhF

Binance

- TN6yVddHhmfTHJgdzSnPJJ5M4pxQKqKuVe

- TVBfaX2DF6kBxeveJMEgDjXwpY9zQpES57

- TTTkoMc9VuVKTGFQJPxF5pS2f1XV5u5QHJ

- TAwSDzJgxYhsTkrLkkPiFZsZnkcjmhupfW

- TGyLX41KcZDZpSVH9KjwCbuqNnxDAoTnAB

- TLwgBmjYbkLA5NVFEqrVYVNbnTYmxPKoW2

- TYWjiCsJJJ4wAem1unRFybcvQq9ekL8Btv

- TQZoEGjrCSG6BxNDUreTm7Uec6BBx8vSvn

- TBVT9cx9gdaS1AcUfMASJ56Z9SdUy4E3P7

- TYuEjjSM89QJKKKUX3UyY6TxT6QvhzAc37

- TQnKVsgfboAuwepfSwgNxX2pnMgQLVkU4h

- TU9kSr7ZwLvBknXmfu6WM5c3hcbG4sRV8m

- TXYG7jR37cLtNVgSzqjPZwJk9zb7XMqk6e

11. Next, Inca “reverse traced” from the Deposit Addresses to determine which addresses were part of the common pattern of transactions that were involved in

1 the three steps above. Inca concluded based on this analysis that the Class Members
2 include approximately 400 victims, who lost approximately \$3.7 million combined.

3 12. Based upon my substantial experience involving pig butchering schemes
4 similarly to this one, if the Plaintiff is required to wait until after the Defendants receive
5 notice of this action, it is highly likely that the Defendants will transfer cryptocurrency
6 at issue beyond the reach of discovery or recovery.

7 13. I am familiar with the process of providing notice via the deposit of
8 airdropped or similar service tokens to cryptocurrency accounts, and in my experience,
9 the method of notice proposed in the Proposed Order is reasonably calculated to and
10 would likely result in actual notice of those documents to the individuals or entities that
11 control those wallets, and the existence and contents of those service tokens would be
12 readily apparent to the owners.

13 I declare under penalty of perjury under the law of the State of California that the
14 foregoing is true and correct.

15 Executed this 7th day of June, 2024, in Sinj, Croatia.

16
17 
18 Charles Zach