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11 Attorneys for Plaintiff  
YOUNES YOUNES  
12

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14 COUNTY OF LOS ANGELES  
15

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

17 Plaintiff,

18 v.

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

21 Defendants.  
22

Case No. 24STCV12520

**DECLARATION OF YOUNES YOUNES  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR CLASS CERTIFICATION**

[Notice of Motion, Memorandum of Points and  
Authorities, Statement Regarding Class Notice,  
Proposed Notice of Pending Class Action,  
Declarations of Adam Zarazinski, Shaun  
Martin and Nicole G. Malick, and Proposed  
Order Filed Concurrently Herewith]

Assigned for All Purposes to Hon. Elihu Berle

24 Date: May 7, 2025  
25 Time: 11:00 A.M.  
26 Place: 312 N. Spring Street,  
Los Angeles, CA 90012  
Dept. 6

27 Action Filed: May 17, 2024  
28 Trial Date: None

1 I, Younes Younes, hereby declare and state as follows:

2 1. I am over 18 years old, of sound mind, and competent to make this Declaration. The  
3 statements made in this Declaration are based on my personal knowledge unless specifically stated  
4 otherwise. If called as a witness, I could and would testify truthfully to the facts set forth here.

5 2. I live and reside in Palmdale, California, and I was living there during all the events  
6 described in this Declaration.

7 3. On or about January 5, 2024, I received a message via WhatsApp from a person using  
8 the number (803) 962-3077, claiming to be a job recruiter. This person asked if I was interested in  
9 part-time online work. The next day, I received additional instructions through WhatsApp from  
10 someone who identified herself as “Elvira Taylor.” Taylor claimed to be located in Miami and told  
11 me that I could earn income through a standardized online work platform. She said that payments for  
12 this work would be made in cryptocurrency.

13 4. I began performing tasks on the online platform and was led to believe I had earned  
14 significant amounts of money. However, Taylor later told me that I needed to maintain a specific level  
15 of deposits on the platform and make additional payments called “recharges” before I would be  
16 allowed to withdraw the full amount I had supposedly earned. At that time, I did not know that the  
17 platform was actually controlled by the people perpetrating the scam. Based on her representations, I  
18 purchased and transferred more than \$400,000 in cryptocurrency to the platform. I was never able to  
19 recover the funds I had transferred, and I never received the promised returns.

20 5. After discovering that the online platform was a scam and that I could not get my money  
21 back, I contacted Inca Digital, a cryptocurrency investigation firm, for assistance. Based on the  
22 investigation conducted by Inca Digital and the information provided to me by my counsel, I learned  
23 that my cryptocurrency assets were moved through a series of complex transactions designed to  
24 conceal their origin. Prior to Inca Digital’s forensic tracing and my consultations with counsel, I did  
25 not know about these transactions or how my assets were hidden. I will suffer significant harm if I am  
26 unable to recover these assets.

27 6. I lost my entire life savings because of this scam. As a result, I have been forced to  
28 leave my home, and my family and I are now in severe financial hardship.

7. Since discovering the scam, I have worked closely with my lawyers to provide information and evidence about what happened. I've spent time discussing the details of the scam with them, answering their questions, and helping them gather the information needed for this case.

8. Based on my discussions with counsel about the forensic blockchain tracing done by Inca Digital, I have learned that others like me were targeted by this scam. The flow of funds for other victims is similar to mine, showing a coordinated pattern of fraudulent transactions. We were all misled into sending money based on false promises of earning cryptocurrency. I am committed to pursuing this case because I want to help recover my own money and support efforts to secure justice for everyone else who lost money the same way.

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

Executed this 5<sup>th</sup> day of April, 2025, in PALMDALE, CA.  
City State

Younes Younes