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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 YOUNES
YOUNES 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, Younes Younes, declare under penalty of perjury as follows:

2 1. My name is Younes Younes. I am over 18 years of age, of sound mind,
3 and am competent to make this Declaration. The evidence set forth in the foregoing
4 Declaration is based upon my personal knowledge unless expressly stated otherwise,
5 and if called and sworn as a witness, I could and would testify to each of the facts set
6 forth herein.

7 2. I live and reside in Palmdale, California, which was my location during
8 each of the events set forth herein.

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

16 4. I subsequently began performing work on the online platform and earned
17 substantial alleged amounts due to me. But Taylor informed me that I would be required
18 to maintain a certain level of deposits on the online platform and to make specified
19 “recharge” payments, via cryptocurrency on the platform, before I would be permitted
20 to withdraw the full amount of the payments due to him. Based upon these
21 representations and instructions, I purchased and transferred over \$400,000 in
22 cryptocurrency to the online platform (without knowledge the platform was actually in
23 Defendants’ control).

24 5. After realizing the “work platform” to which I had been enticed was a
25 scam, and my money stolen, I contacted Inca Digital, a cryptocurrency investigation
26 firm, which traced my transactions. Before the investigation by Inca Digital and
27 counsel, I was not aware of transactions undertaken to hide and steal my cryptocurrency
28 assets. I would be severely harmed if I am unable to recover those assets.

6. I lost my entire life's savings as a result of this scam. I have been forced to leave my home, and my family and I have been impoverished as a result. I have no money to post a bond or make any other substantial expenditures in this action.

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

Executed this 6th day of June, 2024, in Palmdale, California.

Younes Younes