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Attorneys for Plaintiff  
YOUNES YOUNES

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

YOUNES YOUNES, on behalf of himself and  
all others similarly situated,  
  
Plaintiff,  
  
v.  
  
ELVIRA TAYLOR and DOES 1 through 200,  
inclusive,  
  
Defendants.

Case No.: 24STCV12520  
  
Hon. Elihu Berle  
  
**[PROPOSED] PRELIMINARY  
INJUNCTION ORDER**  
  
Judge: The Hon. Elihu Berle  
Place: 312 N. Spring Street,  
Los Angeles, CA 90012  
Dept. 6

1 This Court has previously considered Plaintiff's *Ex Parte* Application for a Temporary  
2 Restraining Order and OSC Re: Preliminary Injunction. On June 27, 2024, the Court issued an  
3 Order for Temporary Restraining Order and to Show Cause (the "TRO").

4 Now pending before the Court is whether to grant Plaintiff a preliminary injunction. This  
5 matter was scheduled for hearing on August 5, 2024. Defendants and the entities enjoined by the  
6 TRO were provided with notice of this hearing, informed of the nature of this hearing, and  
7 informed of their right to be heard. Notwithstanding this notice, no opposition was filed in  
8 response to the OSC or TRO, and at the hearing on this matter, none of the Defendants or  
9 enjoined parties appeared.

10 The Court has reviewed and considered the evidence, which includes the Verified  
11 Complaint and Declarations of Plaintiff Younes Younes, Charles Zach, and Shaun Martin. The  
12 Court has also heard and considered the arguments of counsel.

13 This case involved the alleged theft of cryptocurrency using a scheme known as "pig  
14 butchering." Using fake identities, fake websites, offshore bank accounts, and legitimate and  
15 illegitimate cryptocurrency exchanges, Defendants perpetrated a scheme to convert and  
16 fraudulently obtain large sums from Plaintiff and similarly situated individuals. The scheme has  
17 many variations, but it always results – as it did here – with the proceeds of the scheme being  
18 transferred beyond reach through cryptocurrency channels.

19 The version of the scheme that ensnared Plaintiff involved Defendants promising  
20 Plaintiff he would be paid for performing standardized online work. Defendant Elvira Taylor  
21 represented that the work involved real and legitimate online tasks on an online platform. The  
22 online platform was fake, though Plaintiff did not know that while he was performing the work  
23 and while the scheme unfolded. Defendant Elvira Taylor informed Plaintiff he would be required  
24 to maintain a certain level of deposits on the online platform and to make specified "recharge"  
25 payments, via cryptocurrency on the platform, before he would be permitted to withdraw the full  
26 amount of the payments due to him. Based upon these representations and instructions, Plaintiff  
27 purchased and transferred over \$400,000 in cryptocurrency to the online platform (without  
28 knowledge the platform was actually in Defendants' control). Charles Zach and his company

1 were able to trace and connect Defendants’ transactions, follow the trail, and identify several of  
2 the cryptocurrency wallets that held and/or hold the cryptocurrency funds of the Plaintiff and  
3 others who were likely victims of similar “pig butchering” schemes.

4 The TRO froze the digital wallets which held and/or hold the cryptocurrency funds of  
5 Plaintiff and others who were likely victims of similar “pig butchering” schemes. Plaintiff now  
6 seeks a preliminary injunction that would serve to continue the freeze of those wallets.

7 Pursuant to California Code of Civil Procedure § 527(b), when ruling on a request for a  
8 preliminary injunction, courts must evaluate two factors: “(1) the likelihood that the plaintiff will  
9 prevail on the merits at trial and (2) the interim harm that the plaintiff would be likely to sustain  
10 if the injunction were denied as compared to the harm the defendant would likely to suffer if the  
11 preliminary injunction were issued.” *Smith v Adventist Health System/West* (2010) 182  
12 Cal.App.4th 729, 749. These two factors are interrelated; the greater plaintiff’s showing on one,  
13 the less must be shown on the other to support the issuance of preliminary relief. *Butt v. State of*  
14 *California* (1992) 4 Cal.4th 668, 678. In deciding whether to issue provisional relief, a court  
15 must exercise its discretion “in favor of the party most likely to be injured . . . . If denial of an  
16 injunction would result in great harm to the plaintiff, and the defendants would suffer little harm  
17 if it were granted, then it is an abuse of discretion to fail to grant the preliminary injunction.”  
18 *Robbins v. Superior Court (County of Sacramento)* (1985) 38 Cal.3d 199, 205.

19 The Court is satisfied that without the injunction, Plaintiff would suffer great harm as  
20 compared to Defendants. Cryptocurrency theft schemes threaten irreparable injury and loss  
21 absent injunctive relief due to the risk of anonymous and speedy asset dissipation. It would be a  
22 simple matter for Defendants to transfer cryptocurrency to unidentified recipients outside the  
23 traditional banking system and effectively place the assets at issue in this matter beyond the  
24 reach of the Court. Here, through substantial effort, the current location of the cryptocurrency  
25 has been established. But that location can change quickly because Defendants can quickly and  
26 easily move the cryptocurrency to other digital wallets, continuing to put those assets outside the  
27 reach of victims and this Court. The only way to prevent this irreparable harm is to freeze the  
28

1 digital wallets that currently hold the cryptocurrency, thereby preventing Defendants – until this  
2 Court decides otherwise – from transferring the cryptocurrency to parts unknown.

3 Based on the foregoing, it is **ORDERED** that:

4 1. Plaintiff’s request for a preliminary injunction is **GRANTED** pursuant to  
5 California Code of Civil Procedure § 527(b).

6 2. Defendant ELVIRA TAYLOR, and non-parties Binance Holdings Ltd., and OK  
7 Group, and/or any of their agents, servants, employees, attorneys, affiliates, partners, successors,  
8 assigns, subsidiaries, or any other persons through which they act, or who act in active concert or  
9 participation with any of them, and any individual or entity who receives actual notice of this  
10 Order through personal service or otherwise, whether acting directly or through any trust,  
11 corporation, subsidiary, division or other device, or any of them [(collectively, the “Enjoined  
12 Parties”)], are hereby enjoined from withdrawing, transferring, selling, encumbering, or  
13 otherwise altering any of the cryptocurrency or assets held in the wallets identified in Appendix  
14 A of this Order, whether such property is located inside or outside of the United States of  
15 America.

16 3. Plaintiff’s attorneys shall cause a copy of this Order to be served upon the person  
17 or persons controlling the wallets identified in Appendix A of this Order via a special purpose  
18 token or similar device delivered into each of the wallets identified in Appendix A of this Order,  
19 and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff’s  
20 counsel that will include both this Order and all papers upon which it is based. The hyperlink  
21 will include a mechanism to track when a person clicks on the hyperlink. This process shall  
22 constitute actual notice of this Order and sufficient service of process on Defendants and the  
23 person or persons controlling the corresponding wallet addresses identified in Appendix A of this  
24 Order.

25 4. Binance Holdings Ltd and OK Group, and/or any of their agents, servants,  
26 employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons  
27 through which they act, or who act in active concert or participation with any of them, who  
28 receive actual notice of this Order by personal service or otherwise, are hereby directed, within

1 twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to  
2 any of their customers associated with any of the wallet addresses identified in Appendix A of  
3 this Order, including Defendant ELVIRA TAYLOR, and provide counsel for Plaintiff a copy of  
4 such notice.

5 5. Binance Holdings Ltd and OK Group, and/or any of their agents, servants,  
6 employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons  
7 through which they act, or who act in active concert or participation with any of them, who  
8 receive actual notice of this Order by personal service or otherwise, are hereby directed, within  
9 ten (10) days of receiving actual notice of this Order to provide Plaintiff's attorneys with the type  
10 and total amount of cryptocurrency and assets contained within each wallet addressed identified  
11 in Appendix A of this Order as of the date of this Order.

12 6. Pursuant to California Code of Civil Procedure § 995.210, Plaintiff shall post with  
13 the Court a cash undertaking of one thousand dollars (\$1,000.00) in lieu of a bond as security for  
14 the preliminary injunction.

15 7. Until such time as the Court issues an order that either terminates, modifies, or  
16 converts it into permanent injunction, the preliminary injunction set forth in this Order shall  
17 remain in full force and effect.

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19 **IT IS SO ORDERED.**

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21 DATED: \_\_\_\_\_

By: \_\_\_\_\_

Judge of the Superior Court

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**APPENDIX A**

**OKX**

- TXPiHTvpCzFTEvh5SkbwUuSuty2AfigdcY
- TKcqHtVbF11ZhsqxYaBpYQ9tdEQ9RTXWhF

**Binance**

- TN6yVddHhmfTHJgdzSnPJJ5M4pxQKqKuVe
- TVBfaX2DF6kBxevEJMegDjXwpY9zQpES57
- TTTkoMc9VuVKTGFQJPxF5pS2f1XV5u5QHJ
- TAwsDzJgxYhsTkrLkkPiFZsZnkcjmhupfW
- TGyLX41KcZDZpSVH9KjwCbuqNnxDAoTnAB
- TLwgBmjYbkLA5NVFEqrVYVNbnTYmxPKoW2
- TYWjiCsJJ4wAem1unRFybcvQq9ekL8Btv
- TQZoEGjrCSG6BxNDUreTm7Uec6BBx8vSvn
- TBVT9cx9gdaS1AcUfMASJ56Z9SdUy4E3P7
- TYuEjjSM89QJKKKUX3UyY6TxT6QvhzAc37
- TQnKVsgfboAuwepfSwgNxX2pnMgQLVku4h
- TU9kSr7ZwLvBknXmfu6WM5c3hcbG4sRV8m
- TXYG7jR37cLtNVgSzqjPZwJk9zb7XMqk6e