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14 Attorneys for Plaintiff
15 YOUNES YOUNES

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA

17 FOR THE COUNTY OF LOS ANGELES

18 YOUNES YOUNES, on behalf of
19 himself and all others similarly
20 situated,

21 Plaintiff,

22 v.

23 ELVIRA TAYLOR and DOES 1 through
24 200, inclusive,

25 Defendants.

Case No.: 24STCV12520

26 VERIFIED COMPLAINT FOR:

- 27 (1) CONVERSION
28 (2) MONEY HAD AND RECEIVED

CLASS ACTION

1 Plaintiff Younes Younes (“Mr. Younes” or “Plaintiff”), on behalf of himself and
2 all others similarly situated alleges as follows:

3 1. Elvira Taylor (“Taylor”) and Does 1-200 (collectively, “Defendants”) are
4 scam artists who engage in an online theft practice called “pig butchering,” in which
5 they trick innocent victims into buying cryptocurrency and transferring it to fake
6 account wallets that mimic real ones, at which point they steal the money.

7 2. Plaintiff Younes Younes was one of the many innocent victims of this
8 scam. Mr. Younes was contacted by an individual who identified herself as “Elvira
9 Taylor” and who, over a period of months, persuaded Mr. Younes through a series of
10 false representations and fake websites to purchase cryptocurrency and deposit
11 these funds into cryptocurrency wallets controlled by Defendants. Defendants then
12 stole this money. Plaintiff brings this action on behalf of himself and all others
13 similarly situated to recover these stolen funds.

14 **PARTIES**

15 3. Plaintiff Younes Younes is an individual who currently and at all
16 relevant times herein resides in the city of Palmdale, California.

17 4. Defendant Taylor is an individual of unknown residence who, alongside
18 the other defendants, solicited and persuaded Mr. Younes to deposit funds in
19 cryptocurrency wallets controlled by Defendants and then stole those funds.

20 5. Defendants, Does 1 through 200, inclusive, are the individuals and/or
21 entities who orchestrated and perpetrated the activities complained of herein. The
22 true names and capacities of Defendants Does 1 through 200, inclusive, are unknown
23 to Plaintiff at this time, and are therefore sued under such fictitious names pursuant
24 to California Code of Civil Procedure section 474.

25 **JURISDICTION AND VENUE**

26 6. Jurisdiction is proper under section 410.10 of the California Code of
27 Civil Procedure and Article 4 of the California Constitution.

1 7. Venue is proper under section 395 of the California Code of Civil
2 Procedure because the obligations referred to herein were incurred in the County of
3 Los Angeles and the injuries arose in the County of Los Angeles. On information and
4 belief, Elvira Taylor and each of Does 1 through 200, inclusive, are non-residents of
5 California, although their true identities and locations are presently unknown.

6 **FACTUAL ALLEGATIONS**

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

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

23 10. The representations described above were a scam. The online platform
24 was fake, there was no actual work available or payments to be made, and the entire
25 scheme was deliberately designed to entice victims like Mr. Younes to deposit money
26 into accounts, as he did, which was then stolen by Defendants.

1 11. After realizing the “work platform” to which he had been enticed was a
2 scam, and his money stolen, Mr. Younes contacted Inca Digital (“Inca”), a
3 cryptocurrency investigation firm, which traced his transactions. Inca confirmed
4 Defendants had orchestrated a common scheme to steal money from Mr. Younes and
5 similarly situated class members through the fake online work platform described
6 above. On information and belief, and based upon the investigation by Inca, at least
7 several hundred class members have been deprived of their funds through the
8 cryptocurrency scam described above and had those funds deposited in the
9 cryptocurrency wallets described herein in Paragraph 22.

10 12. Defendants’ fake online work scheme is a version of “pig butchering,”
11 which is a type of cryptocurrency theft. Pig butchering victims in the United States
12 have lost billions of dollars, and such schemes have been the subject of several state
13 and federal government investigations and prosecutions.

14 13. In a typical “pig butchering” scheme, scammers promise victims money
15 in return for various deposits or work efforts and then fabricate evidence of positive
16 performance and accounts on fake websites designed to look like functioning
17 cryptocurrency trading venues or investment companies designed to entice victims
18 to deposit or “invest” more money. When the victims have been sufficiently “fattened”
19 with false profits or account statement, the scammers then steal the victims’ funds,
20 and attempt to cover their tracks by moving the stolen property through a maze of
21 subsequent transactions.

22 14. Defendants here illegally converted the assets of Mr. Younes and the
23 other class members through a standardized fake online work platform. Defendants
24 used a systematized method to exploit Mr. Younes and the other class members and
25 steal their cryptocurrency by recruiting class members to enroll in the fake online
26 work platform and then used that platform to facilitate the transfer of the victim’s
27 cryptocurrency to cryptocurrency wallets controlled by Defendants.
28

1 15. The standardized scheme perpetrated by Defendants involved facts
2 common to the members of the class, including but not limited to the following: (i)
3 standardized written communications with class members to persuade them to
4 enroll in the fake online work platform, including common written communications
5 through social media and messaging applications, the use of fake identities, and
6 standardized false claims related to cryptocurrency and the need for the victim to
7 make deposit and “recharge” payments in cryptocurrency on the online platform in
8 order to receive the purported proceeds of their work; (ii) the common use of
9 cryptocurrency applications by class members to transfer funds to wallets controlled
10 by Defendants; (iii) the unlawful conversion of cryptocurrency owned by class
11 members for Defendants’ own use; (iv) the common use of Defendants’
12 cryptocurrency addresses, including transfer of cryptocurrency ultimately to the
13 deposit addresses set forth in Paragraph 22, and (v) significant financial harm to
14 class members from the conversion of their assets.

15 16. The “tasks” performed by Mr. Younes and similarly-situated class
16 members were not real tasks, but were instead merely employed as an enticement
17 for the class members to transfer funds to Defendants’ cryptocurrency wallets and
18 to facilitate the unlawful conversion of those funds.

19 17. Defendants attempted to conceal their conversion of the cryptocurrency
20 of the members of the class through a series of online transactions designed to hide
21 their trail. However, to date, an investigation by Inca has been able to trace and
22 connect Defendants’ transactions, follow the trail, and identify several of the
23 cryptocurrency wallets that held and/or hold the cryptocurrency funds of Mr. Younes
24 and members of the class.

25 18. Inca’s investigation involved two phases, each of which is precise,
26 reliable and replicable, as set forth below. First, in phase one, Inca “forward traced”
27 funds from Plaintiff’s deposit of cryptocurrency with Defendants to other wallets.
28

1 Subsequently, in phase two, Inca “reverse traced” the flow of funds into the above
2 addresses and determined that additional addresses matched Plaintiff’s flow of
3 funds as part of a common scheme involving other members of the class.

4 19. Inca’s “forward tracing” was based on a three-step analysis: (1)
5 identifying the addresses that initially received Plaintiff’s cryptocurrency; (2)
6 tracking the transfer of funds from those addresses to two “swap router and bridge”
7 addresses and then through a series of transactions on the TRON blockchain, and
8 (3) tracking those funds through a series of wallet addresses to the “Deposit
9 Addresses” set forth in Paragraph 22. (A “blockchain” is a system used to record
10 cryptocurrency transactions.)

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

15 0x49f8B7feEE8C0B85ff61F2d7c38Af809614515Df

16 0x64E5f1a2480a3967EDD30b0b400Daf18422cE552

17 21. Second, Inca analyzed transfers from these two addresses and found
18 that funds were routed to two “swap router and bridge” addresses. A “swap router
19 and bridge” address is a kind of aggregator that is used to convert funds to a different
20 cryptocurrency and then send them from one blockchain to another. In this case, the
21 “swap router and bridge” addresses were called “SWFT.PRO” and “OKX DEX
22 Aggregation” and were used to convert funds to a different cryptocurrency (known
23 as “USDT”), which was then bridged to the TRON blockchain. These two addresses
24 are:

25 0x92e929d8B2c8430BcAF4cD87654789578BB2b786 (SWFT.PRO)

26 0xFc99f58A8974A4bc36e60E2d490Bb8D72899ee9f (OKX DEX Aggregation)
27
28

22. 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
- TKcqHtVbF11ZhsexYaBpYQ9tdEQ9RTXWhF

Binance

- TN6yVddHhmfTHJgdzSnPJJ5M4pxQKqKuVe
- TVBfaX2DF6kBxeveJMEgDjXwpY9zQpES57
- TTTkoMc9VuVKTGFQJPxF5pS2f1XV5u5QHJ
- TAwSDzJgxYhsTkrLkkPiFZsZnkcjmhupfW
- TGyLX41KcZDZpSVH9KjwCbuqNnxDAoTnAB
- TLwgBmjYbkLA5NVFEqrVYVNbnTYmxPKoW2
- TYWjiCsJJJ4wAem1unRFybcvQq9ekL8Btv
- TQZoEGjrCSG6BxNDUreTm7Uec6BBx8vSvn
- TBVT9cx9gdaS1AcUfMASJ56Z9SdUy4E3P7
- TYuEjjSM89QJKKKUX3UyY6TxT6QvzhAc37
- TQnKVsgfboAuwepfSwgNxX2pnMgQLVku4h
- TU9kSr7ZwLvBknXmfu6WM5c3hcbG4sRV8m
- TXYG7jR37cLtNVgSzqjPZwJk9zb7XMqk6e

23. Next, Inca “reverse traced” from the second order addresses, or addresses which received funds from the addresses Plaintiff sent funds to, in order to determine which addresses were part of the common pattern of transactions that were involved in the three steps above. Inca concluded based on this analysis that

1 the Class Members include approximately 400 victims, who lost approximately \$3.7
2 million combined.

3 **CLASS ALLEGATIONS**

4 24. This action may be properly maintained as a class action under
5 California Code of Civil Procedure § 382.

6 25. The proposed Class is defined as follows: All persons whose property
7 was converted by Defendants using the fake online work platform and then routed
8 and deposited at the addresses set forth in Paragraph 22.

9 26. Excluded from the Class are individual Defendants and their families;
10 corporate Defendants and their officers, directors and affiliates, if any, at all relevant
11 times; Defendants' legal representatives, heirs, successors or assigns; and any entity
12 in which Defendants have or had a controlling interest.

13 27. Plaintiff reserves the right to amend or modify the Class in connection
14 with a motion for class certification or as the result of discovery.

15 28. Plaintiff does not currently know the precise size of the proposed Class,
16 but Plaintiff is aware that the Class is so numerous that joinder of all members is
17 impracticable, if not impossible, because of the number of Class Members and the
18 fact that Class Members are potentially in geographically disparate locations. Upon
19 information and belief, the Class includes at least 100 members.

20 29. Although the number and identities of Class Members are currently
21 unknown to Plaintiff, it is possible to attempt to ascertain Class Member identities
22 through notice to the original owners of assets contained in the accounts listed in
23 Paragraph 22 of this Complaint, as well as through discovery, including into account
24 records at relevant institutions.

25 30. Nearly all factual and legal issues raised in this Complaint are common
26 to each of the members of the Class and will apply uniformly to every member of the
27 Class.

1 31. The claims of the representative Plaintiff are typical of the claims of
2 each member of the Class, and by pursuing his own interests Plaintiff will advance
3 the interest of the absent class members.

4 32. Plaintiff, like all other members of the Class, sustained damages
5 arising from Defendants' scheme and subsequent transactions to convert stolen
6 property and hide the locations of victims' cryptocurrency assets. The representative
7 Plaintiff and the members of the Class were, and are, similarly or identically harmed
8 by the same unlawful, deceptive, unfair, systematic, and pervasive pattern of
9 misconduct.

10 33. Plaintiff, like all other members of the Class, is entitled to the same
11 declaratory, injunctive and other relief as the members of the Class.

12 34. Plaintiff will fairly and adequately represent and protect the interests
13 of the Class. There are no material conflicts between the claims of the representative
14 Plaintiff and the other members of the Class, including absent members of the Class,
15 that would make class certification inappropriate.

16 35. Counsel selected to represent the Class will fairly and adequately
17 protect the interest of the Class, and have experience in complex and class litigation
18 and are competent counsel for class action litigation. Counsel for the Class will
19 vigorously assert the claims of all members of the Class.

20 36. This action is properly maintained as a class action in that common
21 questions of law and fact exist as to the members of the Class and predominate over
22 any questions affecting only individual members, and a class action is superior to
23 other available methods for the fair and efficient adjudication of the controversy,
24 including consideration of: the interests of the members of the Class in individually
25 controlling the prosecution or defense of separate actions and/or proceedings; the
26 impracticability or inefficiency of prosecuting or defending separate actions and/or
27 proceedings; the extent and nature of any litigation concerning the controversy
28

1 already commenced by members of the Class; the desirability or undesirability of
2 concentrating the litigation of the claims in the particular forum; and the difficulties
3 likely to be encountered in the management of a class action.

4 37. Among the numerous questions of law and fact common to the Class
5 are: whether Defendants have acted or refused to act on grounds generally applicable
6 to the Plaintiff and the Class; whether Defendants have a pattern, practice and
7 scheme of “pig butchering” and subsequent digital transactions to convert stolen
8 property and hide the locations of victims’ cryptocurrency assets; to what extent
9 Plaintiff and members of the Class are entitled to damages; and to what extent
10 Plaintiff and members of the Class are entitled to declaratory and injunctive relief.

11 38. Defendants have consistently acted and refused to act in ways generally
12 applicable to the Class. Thus, final declaratory and injunctive relief with respect to
13 the entire Class is appropriate.

14 39. Plaintiff and the members of the Class have suffered or are at
15 imminent, severe, and unacceptably high risk of suffering irreparable harm because
16 of Defendants’ ability to move funds at any time, without notice. If Defendants
17 withdraw funds, Plaintiff and the members of the Class will not be able to recover
18 their funds, and would lose their property forever.

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1 **FIRST CAUSE OF ACTION**

2 **(For Conversion)**

3 **(Against Each Defendant)**

4
5 40. Plaintiff re-alleges each paragraph of this Complaint as if fully set forth
6 herein.

7 41. Plaintiff and the other members of the class transferred assets owned
8 by them to Defendants.

9 42. Defendants wrongfully withheld and converted to themselves the
10 assets and property of Plaintiff and the other members of the class in a manner
11 inconsistent with their property rights in those assets.

12 43. As a result of the foregoing, Plaintiff and the other members of the class
13 have been deprived of the use of the above assets and damaged in an amount to be
14 established at trial.

15 44. The above-described conduct of Defendants was made with oppression,
16 fraud, and malice, and with actual and constructive knowledge that the assets were
17 wrongfully converted by Defendants for their own personal use and without the
18 knowledge of or approval by Plaintiff or the other members of the class.

19 45. Plaintiff, on behalf of himself and all others similarly situated,
20 accordingly requests imposition of compensatory damages, in addition to exemplary
21 and punitive damages, against Defendants, as well as appropriate equitable relief,
22 including but not limited to entry of a preliminary and permanent injunction that
23 seizes and returns to plaintiff the class the cryptocurrency assets contained in the
24 cryptocurrency wallets listed in Paragraph 22 herein.

1 **SECOND CAUSE OF ACTION**

2 **(For Money Had and Received)**

3 **(Against Each Defendant)**

4
5 46. Plaintiff re-alleges each paragraph of this Complaint as if fully set forth
6 herein.

7 47. As described more fully above, Defendants received money and
8 property from Plaintiff and the similarly-situated members of the class intended to
9 be used for the exclusive benefit of Plaintiff and the class, respectively.

10 48. Defendants did not, in fact, use the money and property received from
11 Plaintiff and the members of the class for their benefit, but instead used that money
12 for themselves.

13 49. As a result of the foregoing, Plaintiff and the members of the class have
14 been damaged in an amount to be established at trial, and request compensatory
15 damages in an amount to be established at trial in addition to appropriate equitable
16 relief, including but not limited to entry of a preliminary and permanent injunction
17 that seizes and returns to Plaintiff the class the cryptocurrency assets contained in
18 the cryptocurrency wallets listed in Paragraph 22 herein.

19
20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays for an award against Defendant as follows:

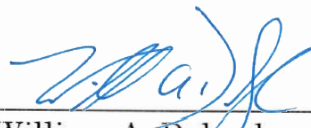
- 22 1. For compensatory damages in excess of \$400,000, in an amount to be
23 proved at trial;
- 24 2. Punitive damages in excess of \$5,000,000 due to Defendant's wrongful
25 conversion of funds;
- 26 3. For attorney's fees and costs of suit;
- 27 4. Pre- and post-judgment interest; and
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5. For such other and further relief as this Court deems just and proper.


Dated: May 15, 2024

DTO LAW

By: 
William A. Delgado

Attorneys for Plaintiff
YOUNES YOUNES

Dated: May 15, 2024

By: 
Shaun P. Martin

Attorneys for Plaintiff
YOUNES YOUNES

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial for all claims so triable.

Dated: Dated: May 15, 2024

DTO LAW

By:

William A. Delgado

Attorneys for Plaintiff
YOUNES YOUNES

Dated: Dated: May 15, 2024

By:

Shaun P. Martin

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