

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA**

MARCO OHLIN and NATASHA PARACHA,

Plaintiffs,

v.

DEFENDANT “1” a/k/a “SELINA” and JOHN
DOES 1-20, as yet unidentified Individuals,
Business Entities and/or Unincorporated
Associations,

Defendants.

CASE NO. 3:23 cv-08856

**COMPLAINT FOR
CONVERSION OF STOLEN CRYPTOCURRENCIES**

Plaintiffs, MARCO OHLIN and NATASHA PARACHA, by and through undersigned counsel, sue DEFENDANT “1” a/k/a “SELINA” and JOHN DOES 1-20, as follows:

PRELIMINARY STATEMENT

1. Defendants stole cryptocurrency from Plaintiffs which at the time of the theft had an approximate value of Eight Hundred Sixty-Two Thousand Six Hundred Eighty-Five Dollars and Twenty-Seven Cents (\$862,685.27) pursuant to a sophisticated global internet cryptocurrency fraud and conversion scheme.

2. Defendant “1” played a material role in the theft of Plaintiffs’ assets, and upon information and belief, currently possesses all or a significant

portion of Plaintiffs' stolen property.

3. Plaintiffs bring this lawsuit to recover their stolen assets.

SUBJECT MATTER JURISDICTION AND VENUE

4. This is an action for damages related to the theft of Plaintiffs' cryptocurrency assets as detailed below. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 (diversity jurisdiction).

5. Venue is proper in this District pursuant to 18 U.S.C. § 1965(a) and (b), and 28 U.S.C. § 1391(b) and (c).

THE PARTIES AND PERSONAL JURISDICTION

6. Plaintiffs MARCO OHLIN and NATASHA PARACHA are individuals, are *sui juris*, and are residents and citizens of California.

7. Defendant "1" is an individual, is *sui juris*, and is subject to the personal jurisdiction of this Court. Defendant "1" represented to Plaintiff MARCO OHLIN that her name was "SELINA." Defendant represented to Plaintiff MARCO OHLIN that she was Chinese and the parties' communications consistently demonstrated Defendant "1" was of Chinese descent who is likely located in China.

8. Defendants JOHN DOES 1-20 are as of yet unidentified Individuals, Business Entities, And/or Unincorporated Associations, cohorts of Defendant "1," are *sui juris*, and are subject to the personal jurisdiction of this Court.

9. At all times material hereto, Defendants have maintained and continue

to maintain, private cryptocurrency wallets and cryptocurrency exchange accounts in which all of or a portion of Plaintiffs' stolen cryptocurrency currently sits.

10. Defendants are subject to personal jurisdiction in this district, because they direct business activities toward and conduct business with consumers throughout the United States, including within the State of Florida and this district through at least a fraudulent website and mobile application (memxkl.live) which can be accessed on the internet and on smartphones and are accessible from Florida.

11. Moreover, every website has at least one associated IP address that it uses to communicate with devices on a network. The IP address for memxkl.live is 43.250.186.114. Plaintiffs have tracked the memxkl.live IP address to Hong Kong, China.

12. Thus, alternatively, Defendants are subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i) Defendants are not subject to jurisdiction in any state's court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.

ALLEGATIONS COMMON TO ALL COUNTS

A. Defendants Execute an International Cryptocurrency Theft Scheme

13. Plaintiff MARCO OHLIN desired to invest money in cryptocurrency.

14. Plaintiff MARCO OHLIN began searching online and on social medial

to learn how he could invest in cryptocurrency.

15. Plaintiff MARCO OHLIN met Defendant “1” a/k/a “SELINA” who communicated with Plaintiff MARCO OHLIN via Telegram.

16. Defendant “1” misrepresented that she would teach Plaintiff MARCO OHLIN how to become a successful cryptocurrency day trader by using a trading method she called ultra short-term trading.

17. Defendant “1” lured Plaintiff MARCO OHLIN by showing him examples over the Telegram app of how she was successfully earning high returns on her ultra short-term trading methods.

18. Defendant “1” represented to Plaintiff MARCO OHLIN that she was using a trusted mobile application called MEMX that, according to Defendant “1”, was owned and operated by Members Exchange.

19. Members Exchange (MEMX) is a legitimate but relatively new U.S.-based stock exchange which began operating in approximately 2019 and initially only allowed its customers to trade equities. In approximately 2022, Members Exchange began offering its customers the ability to trade cryptocurrency on its exchange using its web- and mobile-based platforms.

20. Defendant “1” assisted Plaintiff MARCO OHLIN in downloading [memxkl.live](https://www.memxkl.live) which she claimed was the MEMX trading mobile application. However, the application she provided to Plaintiff MARCO OHLIN

was not the MEMX application owned and operated by Members Exchange but was instead a fraudulent copycat mobile application created to deceive individuals, including Plaintiff MARCO OHLIN, into believing they were investing on a legitimate cryptocurrency exchange owned and operated by Members Exchange.

21. To further entice Plaintiff MARCO OHLIN into believing she was a legitimate investor who only wanted to assist Plaintiff MARCO OHLIN in becoming a successful cryptocurrency trader like her, on or about July 14, 2022, Defendant “1” had Plaintiff MARCO OHLIN run a test where he transferred approximately \$500.00 worth of cryptocurrency from his Coinbase account into the fraudulent memxkl.live mobile application. When Plaintiff MARCO OHLIN was able to transfer the \$500 worth of cryptocurrency from the fraudulent MEMX mobile application back to his Coinbase account, he believed that Defendant “1” was a legitimate investor who wanted to help him learn how to invest cryptocurrency and, further, that the fraudulent memxkl.live mobile application he had downloaded was also legitimate.

22. After familiarizing himself with the process of trading on the fraudulent MEMX mobile application recommended by Defendant “1,” and in reliance on the foregoing false and fraudulent misrepresentations, Plaintiff started to transfer cryptocurrency from his Coinbase account, a legitimate third-party online platform for buying, selling, transferring, and storing cryptocurrency, to the fraudulent MEMX platform.

23. Defendants posted fraudulent returns on their fake MEMX mobile application which made it appear that Plaintiff MARCO OHLIN was making money on his trades. As a result, he continued to transfer cryptocurrency from his Coinbase account to the fraudulent MEMX exchange.

24. The scheme was so convincing that eventually Plaintiff NATASHA PARACHA, who is Plaintiff MARCO OHLIN's girlfriend, decided that she would transfer cryptocurrency from her account to Plaintiff MARCO OHLIN's account so that Plaintiff MARCO OHLIN could invest her cryptocurrency as well.

25. When Plaintiffs attempted to transfer even small portion of their cryptocurrency from the fraudulent MEMX application back to Coinbase, Plaintiffs experienced issues and were unable to make transfers.

26. When Plaintiff MARCO OHLIN questioned Defendant "1" about the transfer issues he was experiencing, Defendant "1" provided excuses and made additional false representations.

27. Plaintiffs were eventually convinced not to withdrawal their cryptocurrency but to instead invest more of it in the fraudulent MEMX platform after Defendant "1" promised a short-term 10x return on their investment.

28. Because of the fraudulent representations contained on the fake MEMX account, and misrepresentations made by Defendant "1", Plaintiffs MARCO OHLIN and NATASHA PARACHA believed that they had made significant money from

their investments.

29. By the end of August, Plaintiffs believed they had made a considerable amount of money. In fact, they were told by Defendant “1” that the value of their cryptocurrency had grown from approximately SIX HUNDRED THOUSAND DOLLARS (\$600,000.00) to approximately SIX MILLION DOLLARS (\$6,000,000.00), which was also reflected on the fraudulent MEMX application.

30. Plaintiffs were happy with what they believed was a significant return on their investment. However, they decided it was time to transfer all the cryptocurrency from MEMX back to Plaintiff MARCO OHLIN’S Coinbase account.

31. However, Plaintiff MARCO OHLIN was told that before he could withdrawal their cryptocurrency, he was required to transfer additional cryptocurrency to the fraudulent MEMX exchange to pay taxes.

32. Relying on this false statement, Plaintiffs transferred another \$234,235.91 worth of USDT to the fake MEMX account.

33. Unfortunately, even after paying what he thought were the taxes owed on their investments, Plaintiff MARCO OHLIN made numerous unsuccessful attempts to transfer the cryptocurrency from the fake MEMX account back to his Coinbase account.

B. Plaintiffs’ Forensic Tracking of Their Stolen Cryptocurrency

34. When a transaction is made on the blockchain it is assigned a “transaction hash” (“TXID”). A transaction hash is a unique string of characters that is given to every transaction that is verified and added to the blockchain. A TXID is used to uniquely identify a particular transaction. All on-chain transactions (the transactions from or to external addresses) have a unique TXID that can be seen in transaction details. All on-chain transactions (depositing and withdrawing of funds) have a unique TXID that can be found in transaction details.

35. Within the time frame of July 14, 2022, and July 25, 2022, Plaintiff MARCO OHLIN transferred a total of 21.05328 ETH (Ethereum) worth, at that time, a total of \$32,063.49 USD to a virtual wallet address controlled by Defendant “1” 0x8BEeBBC4eC8956607BAD730F097F29d1d18ce8d0 (“Defendant “1” Wallet”) from Plaintiff MARCO OHLIN’S virtual wallet address 0xeB2629a2734e272Bcc07BDA959863f316F4bD4Cf (“Plaintiff’s Wallet”). The table below lists the respective transactions:

Nr.	Date (EST)	Amount Sent	Defendant “1” Wallet Address	Transaction ID
1	7/14/2022	0.42003 (\$500.91 USD)	0x8BEeBBC4eC8956607BAD730F097F29d1d18ce8d0	0x7d07e4301fa15185d9a20256ea09e2de31a4da1377afc512321229fd6610c5d9
2	7/15/2022	0.29770 (\$366.54 USD)	0x8BEeBBC4eC8956607BAD730F097F29d1d18ce8d0	0xd6895d159908e1529aaef0ab72290d4003d2880440a6f05ce1649bc61fca9ec2

3	7/17/2022	3.2773 6 (\$4,38 5.01 USD)	0x8BEeBBC4eC8956607B AD730F097F29d1d18ce8d 0	0xb82400ad0486f1a140b9e3e0197316d9 74beeda90db12611461a1b96ccde0727
4	7/21/2022	3.3159 3 (\$5,22 4.84 USD)	0x8BEeBBC4eC8956607B AD730F097F29d1d18ce8d 0	0x55c701115e6423aa12a7cc126b569730 eb8fcdc0024231a85c594131f3a8a5cd
5	7/21/2022	13.253 78 (\$20,8 83.71 USD)	0x8BEeBBC4eC8956607B AD730F097F29d1d18ce8d 0	0x577b71f640bf0c59b32391dacc64794b 0dac8871b42cca8097a3f9d9c23b0720
6	7/25/2022	0.4885 1 (\$702. 48 USD)	0x8BEeBBC4eC8956607B AD730F097F29d1d18ce8d 0	0x3212e2900bef092e64bf3a3c7e7c70af6 80356417b134b047e9e75134d9abe01

36. Defendant “1” then transferred Plaintiffs’ funds from the Defendant “1” Wallet to multiple wallet addresses, some belonging to Exchanges (Binance and Crypto.com), and also to secondary wallets belonging to the Defendants. From there, funds were then sent to different Exchanges, as shown in the following transactions below:

Date (EST)	Total Amount Sent	Addresses	Transaction ID
7/15/2022 17:06	5.00 ETH	1st ETH went to 0x5a44717f1A7EDe7Ff3 C5C6668B7d6cd8432363 4E (Binance)	0x3823a023c96a960c2398427f688dd2e444 a31431c6d4056d6f1c8e611a753364

7/16/2022 00:51	0.600435 ETH	2nd ETH went to 0x9d8958Cb38ED7CcF00 AD2d347F8DeEdC93678 baA	0x1369e9201318c3a1f1b8949ab3011eb403 29c249b0320a12075e07ad5c0670c9
7/16/2022 17:56	0.6000413 87 ETH	from there to 0x130305277f4F9D40C17 10Ee963fcE91D95BcC1b 6 (CRYPTO.COM)	0xad4d6be6465036fe7583e418616d94952f b6cd69f03a662d3e3222ce40ba2b5f
7/18/2022 01:43	0.7361 ETH	3rd ETH partially went to 0xdD189CC26c3dDa4F40 10a6F36a15cB5441b1c3d 5 (0.7361 ETH)	0xa801ba7aa9890b0821a48e1ec4558e7c84 e88b36a615897928405b6ca2f91c22
7/20/2022 23:26	0.735681 ETH	from there to 0x389505f098a29a994A3 ed0e674f07cd451dde42C (unidentified Service)	0x6e809161c52aa2ea9f891e4b9596dcbfc43 535f40df427aee8b2f58c444e5f55
7/18/2022 02:22	3 ETH	remainder went directly to 0x5a44717f1A7EDe7Ff3 C5C6668B7d6cd8432363 4E (Binance)	0xf8f1eff7404a53cb2b625eab77826ea16b3 86a68a063263a9e342e1edd5c7d48
7/21/2022 18:56	16.5696 ETH	4th and 5th ETH went to 0x5a44717f1A7EDe7Ff3 C5C6668B7d6cd8432363 4E (Binance)	0x0313a5479704e1b3377c048535a9a77db2 858bfeee0a69dc1442039c6dcf81dc
7/25/2022 23:27	0.4645 ETH	6th ETH went to 0x012d2B2380F9b4603c7 14D1cA8fbB3F73278f4A 6	0xfd5e7f987b0a8fee4ba68e349445a57bcd 83e61c590675dc0640a34e540be90
7/28/2022 00:30	0.4348014 22 ETH	from there to 0xd7299518027444B406F 6756686029a60e4407406	0x8c688833f4d30d00b1f644ce5656a20457 6373a32a5dcb6cf24581d4086267bc
7/28/2022 00:35	0.4343238 9 ETH	and then to 0x000F422887eA7d370F F31173FD3B46c8F66A5 B1c (unidentified service)	0x1dd102d5e596ad8d67d27d0c3bbd0ba76b 07e79d61295efc7b1035820eaf202f

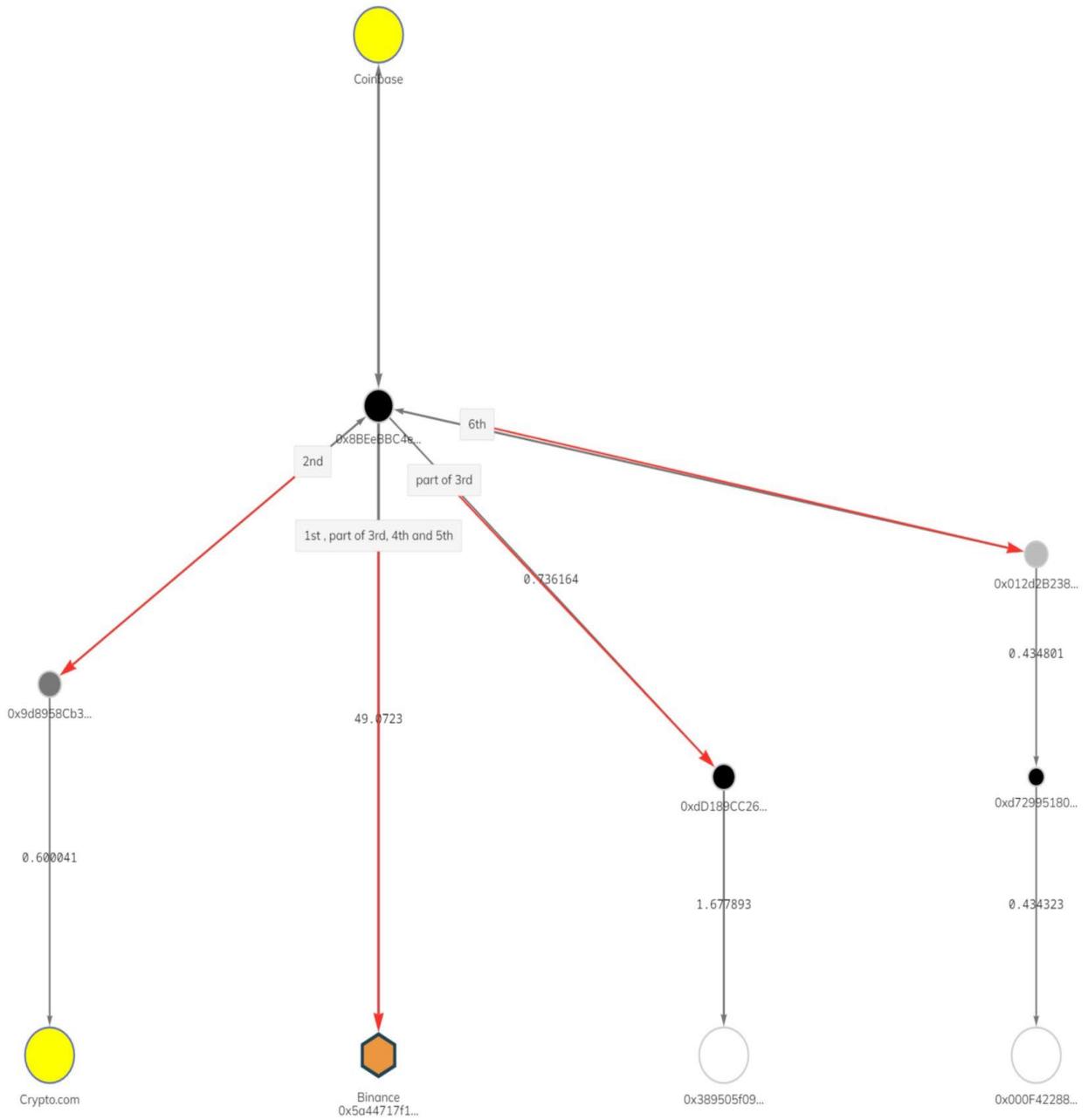


Fig 1. Graph ETH transactions only

37. On July 30, 2022, Plaintiff MARCO OHLIN transferred 18.065869 BTC (Bitcoin) worth, at that time, \$431,015.5 USD to a second virtual wallet address controlled by Defendant “1” 3KvzYQj1SvAkYCK6oQ2UzA1dLuaXhftopD (“Defendant “1” Second Wallet”) from Plaintiff MARCO OHLIN’S virtual wallet address 0xeB2629a2734e272Bcc07BDA959863f316F4bD4Cf (“Plaintiff’s Wallet”). The table below lists the respective transaction:

Date (EST)	Amount Sent	Defendant “1” Second Wallet Address	Transaction ID
7/30/2022	18.065869 (\$431,015.5 USD)	to 3KvzYQj1SvAkYCK6oQ2UzA1dLuaXhftopD	257bfaa63878cb46554f9833b768cd1d1424d92e88b005d5d5ed12b11888bab4

38. Defendant “1” then transferred Plaintiffs’ funds from the Defendant “1” Wallet to the wallet addresses as shown in the following transaction (all BTC ended upon at Binance):

Date (EST)	Amount Sent	Addresses	Transaction ID
7/30/2022 01:52	18.06586907	to 32iCoud66uZmGLNxoRsq4mZ6z7Shkyxgva	2ca45071471297faaf5befed794d637a20b22f7e951f5a428c6ed8bab90bf248
8/15/2022 12:59	5.00	from there to 1KAr47ZWdEmkLTPDjieF2mqHF7aJUoLEVD (Binance)	d1d9b26fbe141643e4b88999b6f856edb0c1da174022b4ae760b877d07a9b05b
8/15/2022 12:59	13.06585137	and to 3KzKY8hxudMnwgGAfuh5d6TsreCmAyiGfp	d1d9b26fbe141643e4b88999b6f856edb0c1da174022b4ae760b877d07a9b05b
		from there to	0e0aa8e18c45348af922fd0d22fa751449bad

8/15/2022 13:19	13.06583687	1KAr47ZWdEmkLTPDjieF2mqHF7aJUoL EVD (Binance)	93cb0ec1062894a369665b4938e
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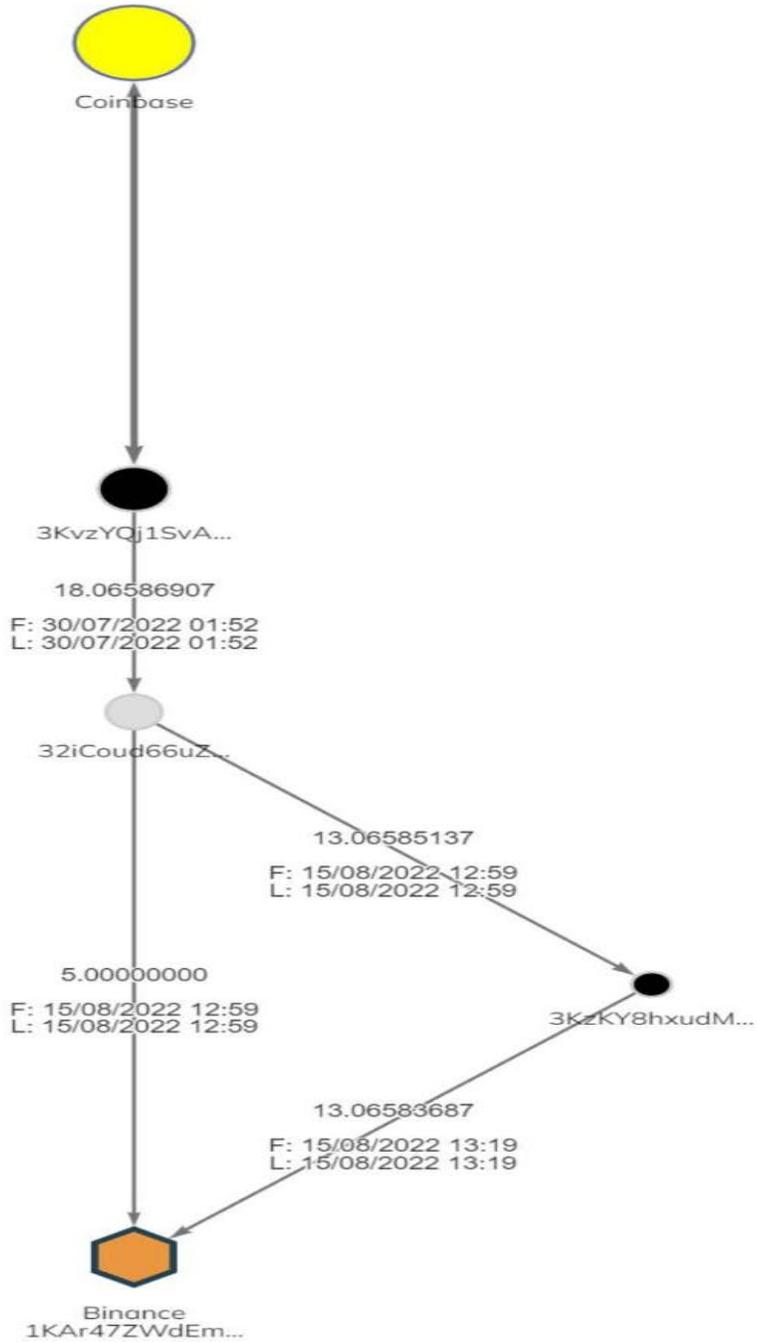


Fig 2. Graph BTC transaction only

39. Within the time frame of August 19, 2022, and September 2, 2022, Plaintiff MARCO OHLIN transferred a total of 399,176.46 USDT (Tether) worth, at that time, a total of \$399,606.28 USD, to a third virtual wallet address controlled by Defendant “1” 0x8b6636BbBf3F01b3EC67845556042F995C8fd5A3 (“Defendant “1” Third Wallet”) from Plaintiff MARCO OHLIN’S virtual wallet address 0xB2629a2734e272Bcc07BDA959863f316F4bD4Cf (“Plaintiff’s Wallet”). The table below lists the respective transactions:

Date (EST)	Amount Sent	Defendant “1” Wallet Address	Transaction ID
8/19/2022	79,997.20 (\$80,207.53 USD)	0x8b6636BbBf3F01b3EC67845556042 F995C8fd5A3	0x200e4019a3581ca5572b3a6ba7f030 76df4a4fc79c12d495c65cdef9cee75 234
8/20/2022	70,014.85 (\$70,116.05 USD)	0x8b6636BbBf3F01b3EC67845556042 F995C8fd5A3	0xf319c2875f8ec792fc3d0e7eb3d1295 4283f52cf5091f69233733173a65ec eb6
8/20/2022	15,025.08 (\$15,046.79 USD)	0x8b6636BbBf3F01b3EC67845556042 F995C8fd5A3	0xf401b61c87d4fa61536bff9d3f9fddea 6ac2e987838b3fae77eefbecb6849e 62
9/02/2022	234,139.33 (\$234,235.9 1 USD)	0xA1b432e2BF9CA4C4F6428a438e0C D4C1AD1CBcA2	0x8b5d14a1a673b028bfb1648eac5b9e 02f5b61195b4b671dee94500dbaa4 dc0c8

40. Defendant “1” then transferred Plaintiffs’ digital assets from Defendant “1”’s wallet to the wallet address as shown in the following transactions:

Date (EST)	Amount Sent	Addresses	Transaction ID
8/20/ 2022 03:25	30,000.00 USDT	1st and 2nd USDT went in tranches of 5x 30k to 0xcA9B4a51C2ee3F6543 2f41ea71B6C693551B38F 4 (OKX)	0xe41b49515156a1d815a991d7425458acf6 d1da43bcdd85832782c0e29061149e

8/20/ 2022 03:38	30,000.00 USDT	and 0x1ce6880Ae94db5FBb57 72EdA73A29c101F4D7D 0d (OKX)	0x9e87dbb52040128c022dc059ae396847b8 a8a9c027d19ba57d3b2d07493f0c2b
8/20/ 2022 03:47	30,000.00 USDT	and 0xcA9B4a51C2ee3F6543 2f41ea71B6C693551B38F 4 (OKX)	0xac11e033aac17327786c0a7a804cb0c340 d463aec72a7283d051ccf563af6a26
8/20/ 2022 04:27	30,000.00 USDT	and 0x1ce6880Ae94db5FBb57 72EdA73A29c101F4D7D 0d (OKX)	0xf48aaca61884caca7879a0f428e53e89c2e 7d3ca574c483513aab249d59dcc6d
8/20/ 2022 17:30	30,000.00 USDT	and 0x007Ac806DA055aaa3c a720A3a054916B7679e83 A	0x69f25195c15a33940a0086f6d5c221dd48 b4f3db8af71c484bc0fe54502550e2
8/20/ 2022 17:31	30,000.00 USDT	from there to 0xcA9B4a51C2ee3F6543 2f41ea71B6C693551B38F 4 (OKX)	0xe2d5fac9f028618f13ae07a1f5209914e58 b934b029848a4c68cbc6b15b1d0ff
8/21/ 2022 02:44	30,000.00 USDT	3rd USDT went to 0x1ce6880Ae94db5FBb57 72EdA73A29c101F4D7D 0d (OKX)	0x0fab78a2856539cba13f004ffc9a12ecb37 d158d0ac883fe778c1604b8dffa85
9/2/ 2022 15:49	234,139.33 USDT	4th USDT went to 0xD27F7b979364834Db6 6e87de441186AdbDc271 F9	0x921ff7e8647ba6c3d92d59c1d5c7703af8c 0b744e75624693a709499e3836245
9/2/ 2022 15:50	30,000.00 USDT	from there to 0x1ce6880Ae94db5FBb57 72EdA73A29c101F4D7D 0d (OKX)	0xb03a69c8dab43c94c0660b474b2ea64f03 1560f7779fd3408156d73e86c9d96b
9/2/ 2022 15:51	30,000.00 USDT	and to 0xcA9B4a51C2ee3F6543 2f41ea71B6C693551B38F 4 (OKX)	0x7ecfcd436c1172b9f5079d6d87e97914be 9c2249cb9316c897cdfb45d747c0c4
9/2/ 2022	30,000.00	and to 0x1ce6880Ae94db5FBb57 72EdA73A29c101F4D7D	0x899b5d5e112b1dcdffd98b10651fb3d239 a06adb29b2bff587afe55fdc261fff

16:18	USDT	0d (OKX)	
9/2/ 2022 16:18	30,000.00 USDT	and to 0xcA9B4a51C2ee3F6543 2f41ea71B6C693551B38F 4 (OKX)	0xaa07473701fb41c438f55832d021afe644e ac8aadbd345f7638f5f1bc8cd9b71
9/2/ 2022 16:50	30,000.00 USDT	and to 0x1ce6880Ae94db5FBb57 72EdA73A29c101F4D7D 0d (OKX)	0xfaec94859f29ccc288caed29901d92bc5bc 7dad608bf87300957ea73f783f47e
9/2/ 2022 16:55	30,000.00 USDT	and to 0xcA9B4a51C2ee3F6543 2f41ea71B6C693551B38F 4 (OKX)	0x4fb0fe8cd9b6427a7172b8211d738b856c 088f06426dd5e686cd117b16cef967
9/2/ 2022 17:52	1,000.00 USDT	and to 0xE62462b570A34Cc19C 59005289D193fb2fB6E3E A	0x83cb527f8227c255014d416953afacd146 571dbdc55c14ecbfcca20090bcde3f
9/2/ 2022 18:17	1,000.00 USDT	and from 0xE.. to 0x5041ed759Dd4aFc3a72 b8192C143F72f4724081A (OKX)	0x313139dc7b4f7a28d9a8d8da7b70310af1 36e5a77598b66cd8cd5564fbb4e864
9/3/ 2022 02:54	30,000.00 USDT	and to 0xcA9B4a51C2ee3F6543 2f41ea71B6C693551B38F 4 (OKX)	0x7e41c39295cda8f0fdc797d7e397d6a7078 23d7ca7fb95c66a87251be75b4c26
9/3/ 2022 02:55	30,000.00 USDT	and to 0xE62462b570A34Cc19C 59005289D193fb2fB6E3E A	0xf0627793adcec71068e16468251f2e2fbb3 421dd1e5e72f4afca421ece621632
9/3/ 2022 02:55	30,000.00 USDT	and to 0xE62462b570A34Cc19C 59005289D193fb2fB6E3E A	0xf1c82c145f40de93547a684ee4b233571ec 6f435dfd0b07bc7f4a76d0fae2f74
9/3/ 2022 03:58	90,000.00 USDT	and from 0xE.. to 0x5041ed759Dd4aFc3a72 b8192C143F72f4724081A (OKX)	0x240e35bd4fbcfbf556d9f491fb5588aa5b78 15942a3ce9bc84f89b299e69395f5

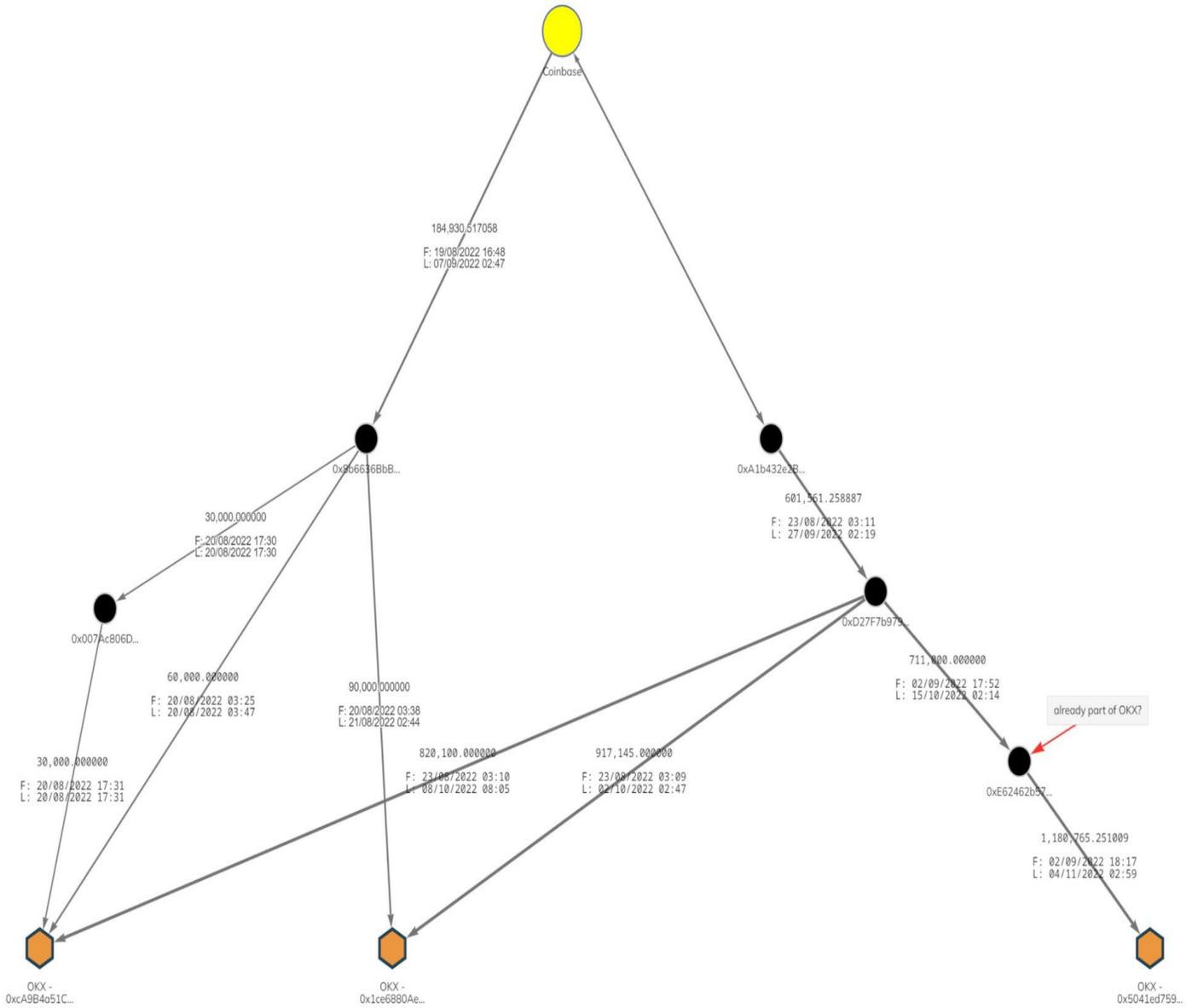


Fig 3. Graph USDT transactions only

41. As set forth above, Defendants stole a total of 21.05328 ETH (Ethereum), 18.065869 BTC (Bitcoin) and 399,176.46 USDT (Tether) from Plaintiffs, valued at the time of the theft at approximately Eight Hundred Sixty-Two Thousand Six Hundred Eighty-Five Dollars and Twenty-Seven Cents (\$862,685.27). Plaintiffs tracked the cryptocurrency to Binance, OKX, Crypto.com and one unidentified service.

42. As shown above, Plaintiffs have suffered substantial damages.

43. If unchallenged, Defendant “1” and her cohorts JOHN DOES 1-20 will continue their fraudulent international criminal crypto theft scheme robbing unsuspecting persons and businesses in the U.S., in this district, and throughout the world.

COUNT I
CONVERSION

44. Plaintiffs adopt and reallege the allegations set forth in paragraphs 1 through 43 above as if fully and expressly set forth herein and further alleges as follows.

45. As more fully alleged above, Defendants misappropriated Plaintiffs’ funds.

46. Defendants have converted Plaintiffs’ funds to their own use or to the use of others not entitled thereto and have exercised dominion and control over the funds to Plaintiffs’ exclusion and detriment.

47. Plaintiffs have suffered damages as a direct and proximate result of Defendants' conversion.

WHEREFORE, Plaintiffs MARCO OHLIN and NATASHA PARACHA demand that judgment be entered against Defendant "1," and JOHN DOES 1-20, jointly and severally, for damages, interest, costs, and such other and further relief as this Court deems just and proper.

COUNT II
UNJUST ENRICHMENT

48. Plaintiffs adopt and reallege the allegations set forth in paragraphs 1 through 43 above as if fully and expressly set forth herein and further alleges as follows.

49. Plaintiffs conferred a direct benefit upon Defendants by transferring the valuable cryptocurrency that Defendants converted from Plaintiffs.

50. Defendants have knowledge of the benefit Plaintiffs conferred upon them and have retained such benefit.

51. The circumstances under which Plaintiffs conferred, and Defendants accepted, such benefit render Defendants' retention of the benefits inequitable.

52. Equity requires that Defendants return to Plaintiffs the benefits he conferred upon Defendants.

WHEREFORE, Plaintiffs MARCO OHLIN and NATASHA PARACHA demand that judgment be entered against Defendant "1" and JOHN DOES 1-20,

jointly and severally, for damages, interest, costs, and such other and further relief as this Court deems just and proper.

COUNT III
IMPOSITION OF CONSTRUCTIVE TRUST
AND DISGOREMENT OF FUNDS

53. Plaintiffs adopt and reallege the allegations set forth in paragraphs 1 through 43 above as if fully and expressly set forth herein and further alleges as follows.

54. This is an action to impose a constructive trust upon the property taken from Plaintiffs that is currently held by Defendants at Binance, OKX and Crypto.com.

55. This action further calls for the restoration to Plaintiffs of that wrongfully obtained property.

56. As set forth above, Defendants -- through actual fraud, misappropriation, conversion, theft, or other questionable means -- obtained Plaintiffs' cryptocurrency, which in equity and good conscience Defendants should not be permitted to hold.

57. The cryptocurrency assets at issue are specific, identifiable property and have been traced to Binance, OKX and Crypto.com.

58. Any and all assets being held by Defendants at Binance, OKX and Crypto.com must be held in trust for Plaintiffs' benefit, as Defendants are not entitled

to the benefit of wrongfully misappropriated, converted, and stolen cryptocurrency assets that were taken from Plaintiffs.

59. The digital assets identified herein which are being held by Defendants at Binance, OKX and Crypto.com must be disgorged to Plaintiffs' benefit, as Defendants are not entitled to the benefit of wrongfully misappropriated, converted, and stolen cryptocurrency assets that were taken from Plaintiffs.

WHEREFORE, Plaintiffs MARCO OHLIN and NATASHA PARACHA demand the equitable imposition of a constructive trust over the property taken from Plaintiffs that is currently under the control of Defendant "1" and/or JOHN DOES 1-20, in the identified cryptocurrency wallet addresses held at Binance, OKX and Crypto.com, and further demands that the wrongfully obtained property be returned to Plaintiffs.

COUNT IV
CONSPIRACY

60. Plaintiffs adopts and realleges the allegations set forth in paragraphs 1 through 43 above as if fully and expressly set forth herein and further alleges as follows.

61. The Defendants conspired and confederated with each other to commit, and committed, Conversion (Count I); and Unjust Enrichment (Count II).

62. Plaintiffs have suffered damages as a direct and proximate result of Defendants' conspiracy.

WHEREFORE, Plaintiffs MARCO OHLIN and NATASHA PARACHA demand that judgment be entered against Defendant “1” and JOHN DOES 1-20, jointly and severally, for damages, interest, costs, and such other and further relief as this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiffs demand trial by jury on all issues so triable.

Date: April 26, 2023.

Respectfully submitted,

By: /s/ Daniel J. Thornburgh

Daniel J. Thornburgh (BAR NO. 42661)

dthornburgh@awkolaw.com

**AYLSTOCK, WITKIN, KREIS &
OVERHOLTZ**

17 East Main Street, Suite 200

Pensacola, FL 32502

Telephone: 850-202-1010

Fax: 850-916-7449

Attorneys for Plaintiffs