

RECEIVED

SENT FROM OFFICE

2023 APR 14 PM 3:42 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Maxwell Crosby Azzarello

Write the full name of each plaintiff.

____ CV _____
(Include case number if one has been assigned)

-against-

See Attached

COMPLAINT

Do you want a jury trial?
 Yes No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- Federal Question
- Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Maxwell Azzarello, is a citizen of the State of
(Plaintiff's name)

Florida
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, see attached, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Maxwell	C	Azzarello
First Name	Middle Initial	Last Name
260 St. George St., Apt. 11		
Street Address		
St. John's, St. Augustine	FL	32084
County, City	State	Zip Code
9044298454	forkintheworld@outlook.com	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: See attached

First Name	Last Name
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Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City	State	Zip Code
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Defendant 2:

First Name	Last Name
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Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City	State	Zip Code
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Defendant 3:

First Name	Last Name
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Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City	State	Zip Code
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V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

4/13/2023

Dated

Maxwell

C

Plaintiff's Signature

Azzarello

First Name

Middle Initial

Last Name

260 St. George St., Apt. 11

Street Address

St. John's County, St. Augustine

FL

32084

County, City

State

Zip Code

904-429-8454

forintheworld@outlook.com

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

Defendants List

Defendant	Title	Service Address	Business State	Incorporated State
Bill, Hillary & Chelsea Clinton Foundation		1200 President Clinton Ave., Little Rock, AR 72201	Arkansas	Arkansas
Bullfrog Capital		364 University Ave, Palo Alto, CA 94301	California	California
CN2T Capital LLC		1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	California
Emerson Collective Investments, LLC		55 Bryant St Ste 259, Palo Alto, California, 94301	California	California
Jeremy Stoppelman Trustee		140 New Montgomery St, San Francisco, United States	California	California
UTD 3/16/10		364 University Ave, Palo Alto, CA 94301	California	California
Ribbit Capital		616 Serra Mall 200, Stanford, CA 94305	California	California
Stanford University		616 Serra Mall 200, Stanford, CA 94305	California	California
StartX				
The Marc R. Benioff Revocable Trust U/A/D/ 12/03/2004		415 Mission St 3rd Floor, San Francisco	California	California
Binance		George Town, 23 Lime Tree Bay Ave	Cayman Islands	Cayman Islands
Changpeng Zhao	CEO, Binance	23 Lime Tree Bay Ave.	Cayman Islands	Cayman Islands
2012 MRL Investments LLC		650 California St., 12th Fl., San Francisco, CA 94108	California	Delaware
Accel (formerly Accel Partners)		500 University Ave, Palo Alto, California, 94301	California	Delaware
Affirm Holdings, Inc.		650 California St., 12th Fl., San Francisco, CA 94108	California	Delaware
Andressen Horowitz		2865 Sand Hill Rd Ste 101, Menlo Park, CA 94025	California	Delaware
Andrew McCollum	CEO, Philo	772 Bryant St San Francisco, CA, 94107-1026	California	Delaware
Binance US		1 Letterman Dr #C3-800, San Francisco	California	Delaware
Brex, Inc.		12832 Frontrunner Blvd Ste 500, San Francisco, California, 84020	California	Delaware
Coinbase		548 Market St. #23008, San Francisco, CA	California	Delaware
Dustin Moskowitz	Co-founder, Open Philanthropy	182 Howard Street #225 San Francisco, CA 94105	California	Delaware

Defendants List

Defendant	Title	Service Address	Business State	Incorporated State
GGV Capital		3000 Sand Hill Road Building 4, Suite 230, Menlo Park, CA 94025	California	Delaware
Intel Capital		2200 Mission College Blvd, Santa Clara, CA 95054	California	Delaware
Khosla Ventures		3000 Sand Hill Rd, Menlo Park, CA 94025	California	Delaware
Lightspeed Venture Partners		2200 Sand Hill Rd., Menlo Park, CA 94025	California	Delaware
Meta Platforms (formerly Facebook Inc.)		1601 Willow Rd, Menlo Park, California	California	Delaware
Naval Ravikant		814 Montgomery St., San Francisco, CA	California	Delaware
Polychain Capital		548 Market Street, Suite 64375, San Francisco	California	Delaware
Quora Inc.		650 Castro St Mountain View, CA	California	Delaware
Rippling, Inc.		55 2nd St Ste 1500, San Francisco, California, 94105	California	Delaware
Silvergate Bank		4250 Executive Sq Ste 300, La Jolla, California, 92037	California	Delaware
Tagomi Systems		201 Montgomery St Ste 263, Jersey City, NJ 07302	California	Delaware
The Founders Fund		1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	Delaware
West Realm Shires, Inc.		1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	Delaware
Durable Capital		5425 Wisconsin Ave Ste 802, Chevy Chase, Maryland, 20815	Maryland	Delaware
Stansbury Partners		1125 N Charles St, Baltimore, Maryland, 21201	Maryland	Delaware
Battery Ventures		One Marina Park Drive, Boston, Massachusetts	Massachusetts	Delaware
Fidelity Management Trust Company		245 Summer St., Boston, MA 92219	Massachusetts	Delaware
Sunley House Capital		800 Boylston St Ste 3300, Boston, Massachusetts, 02199	Massachusetts	Delaware
Forbes		3001 W Big Beaver Rd, Troy, Michigan	Michigan	Delaware
Doug Band	CEO, Teneo	280 Park Ave Fl 4, New York City, New York, 10017	New York	Delaware
Gemini Trust Company		600 Third Avenue, 2nd Floor New York, NY 10016	New York	Delaware
OrbiMed Advisors, LLC		601 Lexington Ave Ste 54, New York, NY 10022	New York	Delaware

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Defendant	Title	Service Address	Business State	Incorporated State
SkyBridge Capital		527 Madison Avenue, 4th Fl, New York, NY 10022	New York	Delaware
Spark Capital		165 Mercer Street, Floor 3 New York City, NY 10012	New York	Delaware
Thrive Capital Partners		295 Lafayette St Ste 701, New York, NY 10012	New York	Delaware
SFT (Delaware) Management, LLC		2 W 2nd St, Tulsa, OK 74103	Oklahoma	Delaware
CMFG Ventures		5910 Mineral Point Rd, Madison, WI 53705	Wisconsin	Delaware
Bitcoin Foundation		700 13th St NW Ste 600, Washington, DC 20005	District of Columbia	District of Columbia
StarkWare		32 Ha'melacha St., Netanya	Israel	Israel
Global Poker Index		120 The Strand, GZR1017 Gzira	Malta	Malta
The William W. Bradley Revocable Trust		Unknown	New Jersey	New Jersey
Allen & Company LLC		711 Fifth Avenue, New York	New York	New York
Libra Advisors		767 3rd Ave Fl 20, New York, NY 10017	New York	New York
New York University		70 Washington Sq S, New York, NY 10012	New York	New York
NYU President's Global Council		70 Washington Sq S, New York, NY 10012	New York	New York
Signature Bank		565 5th Ave, New York, NY 10017	New York	New York
Stanley S. Shuman Revocable Trust		711 Fifth Avenue, New York	New York	New York
THSDFS LLC Series 5		Unknown	New York	New York
Public Investment Fund of Saudi Arabia		Unknown	Saudi Arabia	Saudi Arabia
The Kingdom of Saudi Arabia		Unknown	Saudi Arabia	Saudi Arabia
Baillie Gifford		Calton Square, 1 Greenside Row, Edinburgh, EH13AN	Scotland	Scotland
Chris Hughes	Commissioner, UNAIDS	Avenue Appia 20 · 1202 Genève	Switzerland	Switzerland
Mark Cuban Companies		5424 Deloache Ave, Dallas, Texas 75220	Texas	Texas
Three Arrows Capital		Dubai	United Arab Emirates	United Arab Emirates

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Defendant	Title	Service Address	Business State	Incorporated State
Jasmine Ventures		Worcester	United Kingdom	United Kingdom
Virgin Group		66 Porchester Rd, United Kingdom	United Kingdom	United Kingdom
Integrated Whale Media Investments		3001 W Big Beaver Rd, Troy, Michigan	Michigan	Unknown
The 1953 Trust		Unknown	US Virgin Islands	US Virgin Islands
Brian Singerman	Managing Member, Founders Fund	1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	
Cynthia McAdam	Executive, Ribbit Capital & Bullfrog Capital	364 University Ave, Palo Alto, CA 94301	California	
David Weiden	Partner, Khosla Ventures	3000 Sand Hill Rd, Menlo Park, CA 94025	California	
Dempsey Mork	Partner, Founders Fund	4519 Admiralty Way, Suite A, Marina del Rey, California 94129	California	
Everett Randle		1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	
Greg Tusar		548 Market St. #23008, San Francisco, CA	California	
Hans Tung	Managing Director, GGV Capital	3000 Sand Hill Road Building 4, Suite 230, Menlo Park, CA 94025	California	
Jeremy Mork		4519 Admiralty Way, Suite A, Marina del Rey, California	California	
Jeremy Stoppelman	Trustee, above. CEO, Yelp, Inc.	140 New Montgomery St, San Francisco, United States	California	
Jim Breyer		500 University Ave, Palo Alto, California, 94301	California	
Jonathan Mork		4519 Admiralty Way, Suite A, Marina del Rey, California	California	
Joseph Bankman		616 Serra Mall 200, Stanford, CA 94305	California	
Keith Rabois	Managing Member, Founders Fund	1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	
Linda Fried		616 Serra Mall 200, Stanford, CA 94305	California	

Defendants List

Defendant	Title	Service Address	Business State	Incorporated State
Marc Andreessen	Co-Founder, Andreessen Horowitz	2865 Sand Hill Rd Ste 101, Menlo Park, CA 94025	California	
Marc R. Benioff	Trustee, above. Former Salesforce CEO	415 Mission St 3rd Floor, San Francisco	California	
Matias Van Thienen	Partner, Founders Fund	1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	
Max Levchin	CEO, Affirm	650 California St, 12th Fl, San Francisco, CA 94108	California	
Mehran Sahami	Professor, Stanford University	616 Serra Mall 200, Stanford, CA 94305	California	
Napoleon Ta	Partner, Founders Fund	1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	
Olaf Carlson-Wee	CEO, Polychain Capital	548 Market Street, Suite 64375, San Francisco	California	
Peter Thiel	Managing Member, Founders Fund	1 Letterman Dr Building D Ste 500, San Francisco, CA 94129	California	
Robert L. Joss	The Philip H. Knight Professor and Dean, Emeritus, Stanford University	616 Serra Mall 200, Stanford, CA 94305	California	
Sam Bankman-Fried		616 Serra Mall 200, Stanford, CA 94305	California	
Olwyn Alexander		Unknown	Ireland	
Antanas Guoga (aka Tony G)	Member, Lithuanian National Parliament	53 Gedimino Ave. LT-01109 Vilnius	Lithuania	

Defendants List

Defendant	Title	Service Address	Business State	Incorporated State
Alexandre Dreyfus	Founder, Global Poker Index	120 The Strand, GZR1017 Gzira	Malta	
Ohaleh C. Ghassemi	CFO, Sunley House Capital	800 Boylston St Ste 3300, Boston, Massachusetts, 02199	Massachusetts	
Scott R. Tobin	Managing Member, Battery Ventures Trustee, above.	One Marina Park Drive, Boston, Massachusetts	Massachusetts	
William Bradley	Former Senator. SVP, Sirius Satellite Radio	Unknown	New Jersey	
Andreas Lazar	CEO, Skybridge Capital	1221 Avenue Of The Americas, New York, NY 10020	New York	
Anthony Scaramucci	Chair, NYU President's Global Council	527 Madison Avenue, 4th Fl. New York, NY 10022	New York	
Cameron Winklevoss	General Partner, Spark Capital	600 Third Avenue, 2nd Floor New York, NY 10016	New York	
Chandrika Tandon	Former President, New York University	70 Washington Sq S, New York, NY 10012	New York	
Jeremy Phillips	CEO, Thrive Capital Partners	165 Mercer Street, Floor 3 New York City, NY 10012	New York	
John Sexton	General Counsel, Allen & Co	70 Washington Sq S, New York, NY 10012	New York	
Joshua Kushner	Founder, Libra Advisors	295 Lafayette St Ste 701, New York, NY 10012	New York	
Peter Dilorio	Trustee, above.	711 Fifth Avenue, New York	New York	
Ranjan Tandon	Trustee, above.	711 Fifth Avenue, New York	New York	
Stanley F. Druckemiller	Senior Advisor, Allen & Co	767 3rd Ave Fl 20, New York, NY 10017	New York	
Stanley S. Shuman		Unknown	New York	
Tyler Winklevoss		711 Fifth Avenue, New York 600 Third Avenue, 2nd Floor New York, NY 10016	New York	

Defendants List

Defendant	Title	Service Address	Business State	Incorporated State
Stacy H. Schusterman	Co-chair, Charles and Lynn Schusterman Family Foundation	2 W 2nd St, Tulsa, OK 74103	Oklahoma	
Nicola Sturgeon	Former First Minister of Scotland Partner, Bailie Gifford & Co	St. Andrew's House Regent Road Edinburgh EH1 3DG Calton Square, 1 Greenside Row, Edinburgh, EH13AN Singapore	Scotland Scotland Singapore	
Tom Slater	Gifford & Co	Singapore	Singapore	
Eduardo Saverin	Chairman, The Perot Group	3000 Turtle Creek Blvd, Dallas, Texas 5424 DeLoache Ave, Dallas, Texas 75220	Texas Texas	
Dr. Ross Perot Jr.	Perot Group	3000 Turtle Creek Blvd, Dallas, Texas	Texas	
Mark Cuban	Founder, Virgin Group	66 Porchester Rd, United Kingdom	United Kingdom	
Richard Branson	President, CMFG Ventures	5910 Mineral Point Rd, Madison, WI 53705	Wisconsin	
Brian Kass	Ventures	1601 Willow Rd, Menlo Park, California	California	
Mark Zuckerberg				

ATTACHMENT 1: FACTS AND INJURIES

Facts

Each of the defendants has knowingly conspired, participated in, and benefited financially from a decades-long fraudulent scheme.

The defendants' actions have caused significant financial, emotional, psychological harm to plaintiff, along with harm to plaintiff's health and safety.

In the late 1990s, Olwyn Alexander helped organize an elaborate network of Ponzi schemes (hereafter, "scheme") in her role with the Alternative Assets division of Price Waterhouse in Dublin, Ireland.

The scheme leveraged the internet and network technology in new ways, bringing more decentralization and collaboration to the computer-based Ponzi schemes that Mark Cuban and H. Ross Perot Jr. had participated in since at least the early 1980s.

The scheme involved unregistered securities in Texas, often for oil drilling or medical technology. Alexander helped set up offshore banks in the Caribbean to hide the scheme's assets and funnel them to and from banks in New York. Co-conspirators at Harvard University helped develop and improve upon the technology necessary to operate the schemes.

Confinity Inc., co-founded by Peter Thiel and Max Levchin in 1998, was created in service of this scheme, becoming the digital payments platform PayPal. Affirm Holdings Inc., founded by Max Levchin in 2012, was created in service of this scheme.

Prior to founding Meta Platformed (formerly Facebook Inc.) at Harvard University in 2004, Mark Zuckerberg was an active participant in this scheme, developing network technology to help the scheme operate.

In 2004, when Facebook Inc. was founded by Zuckerberg, Eduardo Saverin, Dustin Moskovitz, Andrew McCollum and Chris Hughes, it was in support of this scheme.

Investments in Facebook Inc. by Peter Thiel, Jim Breyer, and Accel in 2004 were made with the express purpose of developing this scheme.

In or around 2010, Stanford University faculty Robert L. Joss, Joseph Bankman and Linda Fried and others helped develop the legal mechanisms for Caribbean offshore banking that would be used to develop an international cryptocurrency-based Ponzi scheme.

In 2010, brothers Jeremy Mork, Jonathan Mork and Dempsey Mork created a series of shell corporations in the British Virgin Islands in service of the scheme.

Between 2010 and 2004, Virgin Group and Richard Branson solicited investments in the scheme, which were funneled to the scheme via Clinkle, a fictitious payment platform start-up knowingly supported by Stanford professor Mehran Sahami.

In or around 2014, Olaf Carlson-Wee created Polychain Capital in order to develop technology to further decentralize the scheme with support from Peter Thiel, Brian Singerman, Keith Rabois, Napoleon Ta, Everett Randle, Matias Van Thienen, and their venture capital firm, Founders' Fund, along with Naval Ravikant.

In or around 2014, Napoleon Ta, Greg Tusar and Tagomi Systems developed a high-frequency trading platform in order to create a hidden, decentralized liquidity pool available to the scheme's participants.

In 2018, StarkWare Industries was founded in order to further improve the technological tools on which the scheme was built.

Cryptocurrency corporations FTX Trading Inc. and Binance Holdings Inc were founded as part of the scheme by Sam Bankman-Fried and Changpeng Zhao, respectively, and were modeled off the shell corporations created by the Mork brothers in 2010. Binance.US was also created as part of the scheme, with nearly all ownership split between Three Arrows Capital and The West Realm Shires Ltd.

Investors in the scheme included the entities 2012 MRL Investments LLC, Jasmine Ventures, Coinbase, Lighthouse Venture Partners, Baillie Gifford, Spark Capital, Fidelity Management Trust Company, Thrive Capital Partners, Ribbit Capital, Bullfrog Capital, Andreessen Horowitz, Emerson Collective Investments LLC, Battery Ventures, Allan & Company LLC, Khosla Ventures, THSDFS LLC Series 5, GGV Capital, SFT (Delaware) Management LLC, Durable Capital, Sunley House Capital, SMFG Ventures, Founders' Fund, CN2T Capital LLC, Intel Capital, and SkyBridge Capital, Jeremy Stoppelman Trustee UTD 3/16/10, The William W. Bradley Revocable Trust, Stanley S. Shuman Revocable Trust, Libra Advisors, The Marc R. Benioff Revocable Trust U/A/D/ 12/03/2004, Mehran Sahami, StartX, the Kingdom of Saudi Arabia, and the Public Investment Fund of Saudi Arabia.

Individual investors in the scheme included Max Levchin, Tom Slater, Jeremy Philips, Joshua Kushner, Cynthia McAdam, Marc Andreessen, Scott R. Tobin, Peter Dilorio, Stanley S. Shuman, Andreas Lazar, David Weiden, Marc R. Benioff, Stanley F. Druckenmiller, Hans Tung, Stacy H. Schusterman, Jhaleh C. Ghassemi, Anthony Scarramucci, Ranjan Tandon and Brian Kass.

Antanas Guoga (known by his alias "Tony G") helped develop and operate TheHendonMob.com, which served as a coded, decentralized portal for scheme participants. TheHendonMob.com was sold to Global Poker Index in 2013, founded by Alexandre Dreyfus, who continued the site's role in the scheme.

Once the decentralized cryptocurrency Ponzi scheme was established, the technical model was replicated by scheme participants such as Cameron Winklevoss and Tyler Winklevoss, founders of Gemini Trust Company, along with Mark Cuban and Mark Cuban Companies.

The online question-and-answer platform Quora Inc. was created in 2009 to help legitimize the scheme by providing planted answers in support of the scheme, and its participants.

In September, 2012, the Bitcoin Foundation was created in order to lobby members of the U.S. government to support legislation that benefited the scheme and its participants.

In order to further shape a public narrative in support of the scheme Integrated Whale Media Investments bought a controlling stake in Forbes beginning in 2014.

Money was solicited and internationally laundered in support of the scheme via New York University (NYU) via the NYU President's Global Council, developed by Chair Chandrika Tandon and former NYU President John Sexton.

Money was solicited internationally laundered in support of the scheme via the Bill, Hillary & Chelsea Clinton Foundation, which was created for this purpose by President Bill Clinton and Doug Band in 2001.

Money was internationally laundered in support of the scheme via OrbiMed Advisors, LLC. Beginning in 1998.

Beginning in 2016, Silvergate Bank provided banking services for many cryptocurrency companies that participated in the scheme, including the Silvergate Exchange Network, a platform that allowed for immediate conversion of funds from cryptocurrency to fiat currency. Signature Bank provided similar banking services to scheme participants.

On March 8, 2023, Silvergate Bank announced their liquidation, indicating that they no longer had enough assets available to support the scheme, which was nearing insolvency.

Beginning the following day, Founders' Fund and other venture capitalist participants of the scheme told their investors to pull out of Silicon Valley Bank (SVB) with the successful intention of causing a bank run.

Scheme participants such as Forbes promoted the false narrative that the bank failures were due to issues with regional banking and the United States Federal Reserve in order to position cryptocurrency as a safe asset, leading to more investments and fewer withdrawals from scheme victims.

The intentional bank run was not a sudden plan: In 2020, Founders' Fund partner Napoleon Ta became a board member of payment processor Rippling Inc., which held their assets at Silicon Valley Bank. When the bank failed, Rippling directed its customers to Brex, Inc. as an alternative, which received over \$2 billion in deposits in the days following SVB's failure.

Brex, which received substantial funding from Peter Thiel, Ribbit Capital, Durable Capital and Baillie Gifford, served as another liquidity pool for the scheme participants to utilize.

On February 15, 2023, long-time scheme participant Nicola Sturgeon resigned as the First Minister of Scotland in order to prepare for the insolvency of Silvergate Bank and assist her con-conspirators in organizing a bank run.

The trustee of The 1953 Trust developed and oversaw an elaborate blackmail network which grew throughout the 1980s. When the above scheme developed, trustee's elaborate blackmail network helped ensure cooperation from scheme participants.

Individually and collectively, all named defendants have caused material harm to plaintiff, as described in the Injuries section above.

Injuries

Injuries to plaintiff include:

- Financial loss due to economic inflation that resulted directly from this scheme
- Damage to personal security via access to private personal information
- Psychological damage as a result of intentional media misinformation, the erosion of civic institutions and willful acts of economic terrorism
- Environmental damage due to fossil fuel emissions created directly in service of this scheme

