

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

SAN ANTONIO DIVISION

LOGAN PAUL,

Plaintiff,

v.

STEPHEN FINDEISEN AND COFFEE BREAK
PRODUCTIONS LLC D/B/A COFFEEZILLA,

Defendants.

Civil Action No. 5:24-cv-717

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Logan Paul, for his complaint against Defendants Stephen Findeisen and Coffee Break Productions LLC d/b/a Coffeezilla, alleges as follows:

NATURE OF THE ACTION

1. Plaintiff Logan Paul, a globally recognized entertainer, athlete, and entrepreneur, brings this defamation action against Defendant Stephen Findeisen, a/k/a “Coffeezilla”—a self-described investigative journalist and “internet detective” with no actual journalism training or a private investigator’s license—to hold him accountable for maliciously and repeatedly publishing false statements accusing Paul of operating a scam in connection with a troubled blockchain project called CryptoZoo.

2. Starting when he released a three-part YouTube series on CryptoZoo in December 2022, and continuing into the present, Findeisen has perpetuated the false narrative that Paul scammed and defrauded his own fans in connection with the project. Findeisen has perpetuated this false narrative, despite *knowing* it to be completely and utterly false, in order to enhance his own profile and increase his viewership and income in the process. And indeed, he has done so

despite being in possession of—and purposefully omitting from his series and related statements—overwhelming objective evidence that Paul had, in reality, been enthusiastic about the project and deeply committed to its success, only to be deceived by several of the project’s trusted advisors who turned out to be conmen.

3. In early 2021, Paul conceived of CryptoZoo from an animal fusion concept he had seen go viral in other contexts. CryptoZoo was to be a game utilizing blockchain technology, in which players would be able to purchase Egg Non-Fungible Tokens (“NFTs”) that would then hatch into animal NFTs. Players would then be able to breed those animals to create unique and ever-rarer hybrid animals, which would earn players an in-game cryptocurrency called “ZOO Tokens” based on their rarity. All of this activity would be carried out in a virtual ecosystem, where animals could continue to be bred, traded, used for mini arcade games, or sold to earn more ZOO Tokens.

4. To develop the project and navigate the intricacies of blockchain technology, of which Paul was unfamiliar, Paul assembled a team of experts—or, as it turned out, individuals who falsely represented themselves as experts—and spent hundreds of thousands of dollars of his own money on graphics and animation and other project-related expenses.

5. Although CryptoZoo was announced publicly and certain aspects of the project were rolled out in the fall of 2021, Paul’s vision for the game never became a reality. There were multiple reasons for the project’s failure, but the most fundamental was that the team member responsible for overseeing the development of the game, Eduardo (“Eddie”) Ibanez, turned out to be a charlatan who had lied to Paul (and many others) about his background and credentials. Ibanez continuously assured Paul that the game’s development was proceeding apace, and that

completion was imminent, when, in reality, he had incompetently overseen the process and failed to pay his team of developers, despite his assurances that he would do so.

6. Paul's efforts were also stymied and frustrated by a blockchain and crypto advisor named Jake Greenbaum (a/k/a "Crypto King") who turned out to be more interested in trying to personally profit than in helping to create a legitimate project. Both Ibanez and Greenbaum took advantage of the hype created by Paul's affiliation with the project in order to surreptitiously sell ZOO Tokens for millions of dollars, at the expense of those acquiring Tokens in anticipation of actually being able to play the game.

7. Regrettably, despite rightfully exposing the wrongdoing of Ibanez and Greenbaum in his YouTube series, Defendant Findeisen understood that accusing a celebrity like *Paul* of perpetrating a scam would generate exponentially more clicks, views, and ultimately revenue, and would increase his own profile. Findeisen therefore titled his series "Investigating Logan Paul's Biggest Scam," and he proceeded to confidently tell his viewers not only that the project was a scam, but that it was a scam conceived of and perpetrated by Paul. The three-part series was viewed tens of millions of times—each of the videos remain among Findeisen's most popular of all time—and viewers and the public at large were captivated by the narrative of an unserious social media influencer who had supposedly used his fame to dupe his fans into investing money into a fake crypto project, while always intending to abscond with the money.

8. But Findeisen knew full well that Paul had never set out to scam anybody, but to the contrary had always intended to build a legitimate blockchain-based game for participants to enjoy with a like-minded community. In addition to knowing that Paul did not profit from the project in any way, Findeisen possessed scores of contemporaneous internal text messages between Paul and his co-founders showing, for example, that Paul was *adamant* that the project

be executed to perfection before being announced publicly; that Paul was focused on the details of the gameplay experience (including over financial gain); that Paul was explicitly relying upon Greenbaum and Ibanez for all aspects of the game's development and implementation—including the timing and logistics of creating and trading in the ZOO Token liquidity pool; and that Paul was beside himself with frustration about the betrayals that prevented his vision from being realized.

9. Yet, because they did not fit his preferred, self-serving narrative, Findeisen purposefully concealed all those communications from his viewers, save for select messages that he manipulated and intentionally presented devoid of context.

10. Although Paul considered taking legal action against Findeisen at the time his YouTube series was released at the end of 2022, he decided to instead focus his efforts on trying to make things right with those who had shared his enthusiasm for CryptoZoo only to be left disappointed when it failed to materialize. In January 2023, Paul announced that he was working on a buyback program for disappointed CryptoZoo NFT holders, even though Paul had not personally received the proceeds from the sale of these NFTs or otherwise earned any money from the project whatsoever. The buyback was completed in March 2024, and it resulted in Paul successfully coming out of pocket to distribute over \$1 million dollars' worth of Ethereum to eligible NFT holders.

11. Despite his anger over Findeisen's actions and the massive harm that Findeisen's false accusations caused to his reputation, Paul was initially willing to let bygones be bygones. After all, Findeisen had claimed all along that his CryptoZoo investigation was motivated by a desire to call attention to regular people who had purchased CryptoZoo NFTs only to see their investment become worthless. Paul naively believed that his commitment to the buyback program would help him find common ground with Findeisen in that regard.

12. But Paul misjudged Findeisen’s motives. Even after Paul announced the buyback, Findeisen simply could not help himself from dipping back into the well that had proven so effective in earning him viewers, attention, and revenue—both from his YouTube earnings as well as an associated “Patreon” account that he used to solicit donations from subscribers. In the summer of 2023 and continuing into 2024, Findeisen began publishing *additional* YouTube videos—which he also teased and hyped on X (formerly Twitter)—in which he again repeatedly claimed to the public the false allegation that CryptoZoo was a scam and a fraud conceived of and perpetrated by Paul.

13. Throughout the ups and downs of his career, including the CryptoZoo disappointment, Paul has learned to believe in the importance of accountability and taking responsibility for one’s actions. Paul brings this defamation suit to hold Findeisen accountable for his actions and to hold him liable for the immense harm that he has caused to Paul’s reputation through the intentional and reckless dissemination of defamatory falsehoods.

PARTIES

14. Plaintiff Logan Paul is an entertainer, athlete, and entrepreneur. He is a resident and citizen of Puerto Rico and resides in Dorado.

15. Defendant Stephen Findeisen is the host of the Coffeezilla YouTube program. He portrays himself as an investigative journalist and “internet detective” who specializes in “exposing scams” and uncovering “scams” and “fraudsters.” Findeisen is a resident and citizen of the State of Texas and resides in Boerne, Texas.

16. Defendant Coffee Break Productions LLC is a Texas domestic limited liability company of which Findeisen is the sole and managing member. On information and belief, Coffee Break Productions LLC is the entity that produces and owns the rights to the Coffeezilla YouTube

program. On information and belief, Findeisen is the sole member of Coffee Break Productions LLC.

JURISDICTION & VENUE

17. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C §1332 because there is complete diversity of citizenship among the parties and the amount in controversy exceeds \$75,000.00, excluding interest.

18. This Court has personal jurisdiction over Defendants Findeisen and Coffee Break Productions LLC because Defendant Findeisen is a Texas resident, residing in Boerne, Texas, and Defendant Coffee Break Productions is a Texas domestic limited liability company.

19. Venue is proper in this District because Defendant Findeisen resides in this District, Defendants Findeisen and Coffee Break Productions are subject to personal jurisdiction in this District, and because a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this District.

FACTUAL ALLEGATIONS

Logan Paul Builds a Highly Successful Career and Personal Brand—and in the Process Learns a Valuable Lesson About the Importance of One's Reputation

20. Paul's path to becoming a globally recognized entertainer, athlete, and entrepreneur can be traced to his days as a student at Ohio University. In 2013, during his freshman year, Paul began writing and producing comedic skits, stunts, and vlog-style videos for the newly established—but now defunct—video-sharing app Vine, which at the time was skyrocketing in popularity. Paul quickly amassed not just thousands, but *millions* of followers and fans across his social media platforms, and within a few short months he had become one of Vine's most followed users. Major brands like Pepsi, Ritz, HBO, and Virgin Mobile began reaching out to Paul with requests that he produce videos to market their products.

21. Then in 2015, at a time when terms like “content creator” and “influencer” had barely entered the public consciousness, Paul decided to take a giant leap of faith and become a pioneer in the burgeoning digital entertainment market. He left Ohio University after his freshman year and moved into a Los Angeles apartment with like-minded creatives. Paul began enhancing his skillsets by taking acting classes, training with well-known comedy troupes, and collaborating with other successful digital content creators. All the while, he continued writing and producing new content, churning out near-daily videos for his followers.

22. Paul’s leap of faith and exhaustive work ethic paid off. By 2016, he had amassed nearly 20 million followers across his social media platforms. He appeared on the CBS News show *60 Minutes*, and national media outlets like Business Insider and Ad Week began publishing long-form pieces about him, lauding him for his unique mix of physical comedy and charisma and crowning him as one of the most influential internet stars.

23. During this time, Paul also expanded his reach outside of digital media by securing acting roles in the more traditional entertainment industry, including guest starring roles on *Law & Order: SVU* and on Disney’s *Bizaardvark*.

24. When Vine shut down in early 2017, Paul adapted and transitioned to publishing content to his YouTube channels. He began developing and producing longer skits and more daring stunt videos and posting daily vlogs documenting his life and adventures with friends and fellow creatives. Paul’s viewership and fan base continued to skyrocket, and as it did so Paul continued to parlay his success into other business opportunities, which included securing partnerships with the likes of Pepsi, Hanes, and Dunkin Donuts, and developing a successful clothing brand called Maverick by Logan Paul.

25. Paul’s rising star, however, was not entirely free from controversy. In December

2017, Paul traveled to Japan with friends to produce a series of vlog episodes called “Tokyo Adventures.” One of the videos was set to feature Paul and his friends camping overnight in the Aokigahara Forest which, given its reputation as a common site for suicides, was rumored to be haunted. Paul’s aim was to produce a spooky, yet lighthearted episode of the group exploring, setting up camp, and surviving the night amongst the Forest’s supposed ghosts.

26. Things quickly took a turn, however, when the group unexpectedly came across the body of a suicide victim. In a series of regrettable decisions that Paul freely acknowledges showed immaturity, insensitivity, and poor judgment, instead of turning off the camera, Paul continued to film and later uploaded the video to his YouTube channel.

27. The blowback against Paul, justifiably, was swift and relentless. Thousands of people, including celebrities, took to Twitter and other platforms to express their outrage over the video and to condemn Paul for exploiting a suicide victim for views and subjecting his young audience to such horrific content. Within a day, 200,000 people signed a petition to demand YouTube remove Paul from its platform, and news of the controversial video made international headlines.

28. In the face of this overwhelming criticism, Paul took the video down and posted a series of apologies in which he expressed shame and disappointment in himself. But the damage was done. Within days, Paul’s brand and reputation—which he had spent years building—was in tatters. YouTube removed Paul from Google’s Preferred Ads program—which allows brands to sell ads on the platform’s top content creators—and suspended a planned YouTube Red movie deal with him. Meanwhile, the number of viewers and new subscribers on Paul’s YouTube channel plummeted.

29. The harsh blowback took a toll on Paul's own mental health as he attempted to reevaluate himself and his decision-making. Paul not only lost lucrative opportunities, but also valued personal relationships. Almost overnight, he went from being a well-loved, rising star with a flourishing brand, to what felt like the most hated person in the world.

30. Instead of simply issuing public apologies and moving on, Paul took a hiatus from content creation in order to focus on making amends and learning from his serious misjudgment. He connected with suicide prevention and mental health organizations, had challenging conversations with suicide survivors, and began surrounding himself with more positive influences. Over time, Paul worked tirelessly to try and rebuild his reputation. He focused on self-improvement and tried to conduct himself as a role model for his fans and supporters. He also busied himself by branching out into new markets and business pursuits.

31. In 2018, Paul—who had been training in boxing—began leaning into his athletic prowess and promoted a successful white-collar boxing match between himself and fellow YouTuber KSI. He then launched a podcast called *Impulsive*, in which he engages in frank conversations with friends, fellow YouTubers, and public figures like Kevin Hart, Arnold Schwarzenegger, and Mike Tyson. *Impulsive* currently has over 4.6 million subscribers on YouTube.

32. In 2021, Paul announced and marketed a boxing match between himself and legendary world champion boxer Floyd Mayweather Jr., which aired on Showtime and became one of the most successful pay-per-views in 2021. That same year, he broke into the WWE, making his debut on an episode of *Smackdown*, and signed a multi-event contract with the WWE the following year. In 2023, ESPN ranked Paul No. 10 of the 30 best Pro Wrestlers under 30, and as of the filing of this Complaint, he is the reigning United States Champion in the WWE.

33. In 2022, Paul co-founded a sport and energy drink company called Prime Hydration, LLC, which has become extremely successful, surpassing \$1.2 billion in annual sales in 2023.

34. Paul has since credited the controversial Japan episode with helping him to “reset” and become a better person. In a 2022 interview, he spoke openly about that dark time in his life and how it altered his trajectory, stating:

I often look back at that time of my life and the person I was unfortunately becoming, and now at 26, I can safely say Japan was the biggest blessing in my life. I needed a reset. I needed life to check me, and it did. And I became a person that I ended up loving instead of becoming that jackass because I was heading down a nasty path that was validated by clout, money, fame, wealth, which is all just superficial bullshit and it doesn't make a person great and so I really had to revisit my values, rediscover myself, open my ears, listen to the people around me, put the right people in place around me ... At the time, it was like the worst thing ever. I don't think there was a more hated person in the world than me and I'm still rebuilding to this day, and trying to learn and keeping my ears open and getting involved in positive conversation and positive change around the world ... It ended up forcing me to become somebody who I love. And I'm not sure I loved myself back then.¹

35. By applying the charisma and tireless work ethic that made him successful in the first place, but with greater humility and self-reflection, Paul was able to salvage and rebuild his career and reputation. Although extremely painful at the time, the Japan episode taught Paul a valuable lesson about the importance of one's reputation, how quickly it can be destroyed, and how hard it can be to repair it.

Paul Delves into the Digital Asset Market and Develops an Idea for a Blockchain Game Called CryptoZoo that Incorporates NFTs

36. In 2020, Non-Fungible Tokens (“NFTs”) began to experience rapid growth in the nascent digital asset market, which had largely been centered around cryptocurrencies like Bitcoin

¹ *The MMA Hour*, YouTube, (Feb. 28, 2022), <https://www.youtube.com/watch?v=UvmYOWpFF5w&t=9158s>.

and Binance. Like cryptocurrencies, NFTs exist on a blockchain, which acts as a public ledger where digital transactions are processed and recorded across a decentralized network created by various participants in the digital marketplace. Unlike cryptocurrencies, which operate as a form of digital currency, NFTs are more akin to a valuable collectible, like an original piece of artwork or musical recording. Each NFT is one-of-a-kind and non-fungible, meaning it is irreplaceable and cannot be copied, substituted, or subdivided. They generally exist in the form of an image file, and when someone purchases an NFT, the original digital asset is recorded on a blockchain, which is globally accessible. This record provides proof of ownership and value for the NFT.

37. Ever the entrepreneur and innovator, Paul began to explore the digital asset market in 2020 and experiment with creating NFTs.

38. From there, Paul contemplated a blockchain game that incorporated NFTs, so that players could have fun using and trading their digital assets rather than letting them sit in digital wallets. In early 2021, Paul fleshed this out and came up with an idea for a blockchain game based on an animal fusion concept, that later became known as CryptoZoo (“the game”). Paul had seen the animal fusion concept go viral in other contexts, so he knew people enjoyed it, but he was also inspired by his love of Pokèmon, a Japanese media franchise that included video games, trading cards, and animated series and films.

39. In the CryptoZoo game as Paul imagined it, players could acquire Egg NFTs that would hatch a base animal, and players with multiple base animals in their collection could then breed those animals to create hybrid animal NFTs within the game’s virtual ecosystem.

40. Understanding that he did not possess the technical expertise, relevant experience, or time necessary to turn his vision into a reality, Paul and his management team worked to assemble a team of experts in the digital asset market and game development to help bring the

concept to life. To that end, in early 2021, Paul’s management team evaluated potential candidates from within Paul’s social and professional networks and identified Jake Greenbaum and Eddie Ibanez as qualified candidates, and both agreed to join the project.

41. Early on, in the February 2021 timeframe, Greenbaum and Ibanez recommended creating and incorporating a token into the game. The animal NFTs were to yield “ZOO Tokens” to players in amounts that varied depending on the rarity of the animal they owned. The purpose of the ZOO Token was to be for use in the CryptoZoo game ecosystem, with players able to spend the Tokens in a virtual marketplace and on a variety of in-game features and enhancements.

42. Given his purported expertise in the digital asset market, Greenbaum agreed to act as an advisor on all blockchain and cryptocurrency-related aspects of the project, including the advantages and disadvantages of selling NFTs on the Ethereum blockchain network versus the Binance Smart Chain (“BSC”) network. He was also responsible for the “economics” and utility of the ZOO Tokens and NFTs, including the amounts that would be created, allocation, pricing, in-game fees, and so forth.

43. Ibanez—who claimed to have attended MIT, to have worked for various government agencies and professional sports teams, and to have created his own successful marketing and analytics firm—was responsible for leading the game’s development efforts, which included putting together and managing a team of developers to work on gameplay, user interface, and website design. Like Greenbaum, Ibanez also claimed to be very knowledgeable about cryptocurrency, blockchain technology, and the attributes of successful projects in this space, and he too acted as an advisor in these areas.

44. For his part, Paul focused on creating rules for the game, assigning names and rarities to the featured animals, providing high-level input on in-game features, design, and

functionality, and assisting in the hiring and oversight of graphic artists for the game. To that end, Paul hired over ten artists and animators to begin working on creating the artwork and animation for the game.

45. Paul also agreed to be responsible for marketing and promoting the game, but he was adamant about not announcing or promoting the game publicly until development was in its final stages.

46. Signaling his devotion to and faith in the project, in the early months of development, Paul incurred \$220,000 in out-of-pocket expenses, most of which went to paying artists. Ibanez, who represented himself as independently wealthy through his successful data analytics company, told Paul that he would personally go out of pocket for development costs, which would include paying a team of developers working under his direction.

**Greenbaum and Ibanez Sabotage and Undermine the CryptoZoo Project,
Ultimately Leading to Its Failure**

47. Consistent with their roles and responsibilities, Paul relied upon the purported expertise of Greenbaum and Ibanez for all technical and blockchain aspects of the project, including the creation of the liquidity pool and the launch of the ZOO Token, the development of the game, and all related legal and regulatory matters and industry practices.

48. Unbeknownst to Paul, however, Greenbaum and Ibanez were con artists. Both men lied about their resumes, knowledge, experience, and intentions.

49. Greenbaum and Ibanez sabotaged the project from within and prevented it from ever realizing Paul's vision. Following the launch of the ZOO Token in June 2021 and leading up to the launch of Egg NFTs in early September 2021, both Greenbaum and Ibanez separately earned themselves millions of dollars through the surreptitious sale of ZOO Tokens conducted behind the backs of Paul and the other honest members of the CryptoZoo team.

50. Ibanez, meanwhile, misled Paul about the progress of the game and his ability to deliver it. Despite Ibanez's repeated and unequivocal assurances that development was nearing completion—which Paul relied upon when publicly announcing the project on his *Impulsive* podcast in August 2021—in reality it was far behind. As a result, when the Egg NFTs were released for sale on September 3, 2021—the first step of what was supposed to be a multi-step rollout of the game—the sale experienced significant technical issues and delays that signaled to Paul for the first time that he had been misled. As Paul wrote to his co-founders following the Egg sale: “The problem is that we are extremely understaffed, underequipped, under experienced and bit off more than we can chew and none of it was relayed to me.”

51. Far from profiting from, participating in, or even acquiescing to the deceptive conduct and ineptitude of Greenbaum and Ibanez, Paul did everything in his power to get the project back on track. With regard to Greenbaum, Paul took steps to remove him from the project altogether in August 2021 once he learned of Greenbaum's surreptitious and unapproved sales of ZOO Tokens—even going as far as launching a new ZOO Token and blacklisting all wallets associated with Greenbaum.

52. When Paul realized Ibanez was incapable of delivering the game following the Egg sale, he insisted on bringing on additional developers immediately, regardless of the cost. Confronted with yet additional deception and corresponding delays in the week after the Egg NFT sale—including one of Ibanez's developers stealing the code to the game, which caused the development team to have to remind the ZOO Token and airdrop the replacement version to holders *yet again*—Paul wrote to his team on September 30, 2021:

Absolutely fucking ridiculous. All of this. I'm baffled. Everyone will be publicly held accountable for any errors, blunders, or missteps or betrayals that took place for this project — I'm not sure there's a worse feeling than putting your trust in a team that continually fails in the biggest way possible. I've done all I can & for the

first time in my life I'm completely powerless — but I will not go down here, because I'm not responsible, and I WILL execute this game properly with the right people.

53. From September 2021 through 2022, Paul's manager and other advisors worked to get the project back on track, including by hiring new development teams to take over Ibanez's responsibilities.

54. During that time, Paul would receive updates and was assured the project was progressing—albeit slowly, as they now had to work backwards to address all of the problems and issues created by Ibanez. All the while, Paul pushed for transparency with the CryptoZoo community, telling his team in June 2022, for example, that “someone should explain what's going / And be transparent about funds / Cuz I'm curious too.”

55. Near the end of 2022, Paul was coming to terms with the fact that the project might never be completed, despite his best efforts to salvage it. On December 14, 2022, Paul emailed his manager, Jeffrey Levin, and expressed a desire to “do whatever we can do to make this right” with those who had believed in CryptoZoo. Paul said, “I'm still unsure of what happened internally or with the Ibanez character but I want to make sure we're doing as much due diligence as we can for the holders.”

56. For the avoidance of doubt, CryptoZoo was Paul's passion project, and its failure was devastating for Paul, who had invested significant time, energy, and funds into the project. Notwithstanding his own errors of judgment in placing his trust in the wrong people, Paul had nothing but good intentions for the project; all he ever wanted was to create a fun, blockchain-based, digital collectibles game. Unlike Ibanez or Greenbaum, Paul never sold a single ZOO Token or NFT or made any profit whatsoever from the game. To the contrary, Paul lost hundreds of thousands of dollars because of Ibanez and Greenbaum's incompetence and deception.

57. Unfortunately, despite Defendant Findeisen's admitted access to contemporaneous project communications that make unmistakably clear Paul's good intentions, Findeisen perceived an opportunity to increase his viewership and profile and enrich himself in the process by distorting the public narrative to falsely portray the saga of CryptoZoo as a scam perpetrated by Paul.

**Findeisen Builds a Profitable Personal Brand as an Expert in
Ferreting Out Supposed Scams**

58. Stephen Findeisen grew up in Texas and attended Texas A&M University, where he majored in chemical engineering. He has no formal education or training in journalism.

59. After college, he worked as a salesperson for a home builder in the San Antonio area. In 2014, he joined YouTube.

60. His early videos, posted on a channel called "Coffee Break," did not focus on any particular topic, and were more in the vein of video essays than an effort at investigative journalism. One video from 2017, for example, is aimed at criticizing the use of "corporate jargon" in office spaces, while another from the same timeframe asks, "Is Exercising Worth Your Time?"

61. In 2018, Findeisen first adopted the "Coffeezilla" persona, creating his YouTube channel under that name in August of that year. His early videos on the Coffeezilla channel were similar to the previous Coffee Break videos, consisting of interviews on various topics and video essays such as, "How to Live in an Age of Distraction."

62. Beginning in 2019, Findeisen started producing a series of videos on "fake gurus," or individuals who sell self-help or online courses with questionable value. From there, he began to focus more and more on videos billed as exposing "scams," and by 2020, he was posting videos in the current, recognizable Coffeezilla style, featuring him talking into a microphone with what has become a signature white dress shirt and suspenders look.

63. By 2021, he began to focus many of his videos on cryptocurrencies, including Bitcoin, Tether, and Dogecoin. But Findeisen himself has credited his continuing focus on cryptocurrencies and supposed associated scams to his video series on the “Save the Kids” token, a cryptocurrency that was marketed as a charitable effort but turned out to be a classic pump and dump scheme. Numerous online influencers were associated with the token and involved in marketing it.

64. The attention garnered by Coffeezilla’s video detailing his “investigation” of Save the Kids and his conclusion that the token was a scam was a breakout hit for the YouTuber. As the New Yorker magazine put it, “[t]he Save the Kids series marked Findeisen’s transition from a snarky YouTube critic to something more akin to an investigative journalist.”

65. Around the same time as his Save the Kids series, in July 2021, Findeisen published a video he titled “Logan Paul’s New Crypto Coin is an Embarrassment,” which focused on a meme token called Dink Doink. In that video, Findeisen falsely accused Paul of participating in what he characterized as a Ponzi scheme, alleging Paul promoted the token and concealed his involvement in its creation for the purpose of enriching himself in an eventual sell-off.

66. There was no truth whatsoever to Findeisen’s allegations of bad intent; Paul’s trading activity involving the token—which was not discussed at all in the video—was limited, and although Paul was allocated Dink Doink tokens by its founder, he never sold these tokens. They sit in his digital wallet to this day.

67. But the Dink Doink video nevertheless received nearly 800,000 views, and Findeisen was learning that the intersection of cryptocurrency and social media influencers—and especially Paul—was of great interest to his potential audience and had the potential to further increase his profile and earn him significant income.

68. Although YouTube’s compensation policies for creators are complex and actual earnings can vary based on multiple factors, according to Influencer Marketing Hub, creators on average can earn about \$0.018 per video view—which can translate to tens of thousands of dollars per video once a creator is able to get millions of viewers to tune in.

69. By May 2022, Findeisen told the New Yorker that he was no longer selling houses and that creating YouTube content was his full-time job. Going forward, his videos focused almost exclusively on cryptocurrency and supposed scams involving cryptocurrency.

Findeisen Seeks to Drum up Viewership for His Channel by Promoting and Publishing a Series of Videos About What He Claimed Was “Logan Paul’s Biggest Scam”

70. On December 16, 2022, Findeisen published on his Coffeezilla YouTube account the first video in what would become a three-part series about CryptoZoo. The first video, Part 1, was entitled, “Investigating Logan Paul’s Biggest Scam.”



71. Right off the bat, Findeisen promised his audience that he would be revealing the inside story of how Paul scammed victims out of millions of dollars. He claimed that his “high

effort investigation” was “a year in the making,” and he teased, “some of you guys think you know the story, but it goes so much deeper. . . . And of course, at the center of it, we have Logan Paul, who has abandoned this thing . . . leaving thousands of victims in his wake.”

72. The video then introduced CryptoZoo as Paul’s brainchild and explained how the game was intended to work in concept, with participants using ZOO Tokens or other cryptocurrencies to purchase Egg NFTs, which they could then hatch and breed to create ever-rarer hybrid animals, earning additional ZOO Tokens that could be used to purchase additional Eggs or on other in-game features. Findeisen acknowledged that there was nothing particularly unusual, novel, or nefarious about this structure, as “there are a lot of NFT games built on this model,” which is called “play-to-earn.”

73. Nevertheless, consistent with the name of his series, Findeisen insinuated to his viewers that the real problem with CryptoZoo was that Paul had illicit intentions from the outset. Findeisen claimed that those who bought CryptoZoo NFTs had been duped by Paul’s portrayal of himself as “this reformed influencer” rather than “a reckless clout goblin just in it for the money.” He continued, “they thought this time it’s different. Logan Paul couldn’t possibly scam us—right?”

74. The video then discussed the “hatch day” on November 3, 2021, and the technical difficulties and issues with the game that resulted in the inability of users to claim their yield of Tokens or, in some cases, to hatch their Eggs.

75. Findeisen claimed that after the trouble-filled launch on hatch day, Paul entirely washed his hands of CryptoZoo, failing to make any additional contributions and “abandoning the project.” He further claimed that those who had bought CryptoZoo NFTs were led on by allegedly false assurances that Paul remained invested in the project.

76. The remainder of the video is mostly spent discussing the allegation that the CryptoZoo team failed to pay its developers and owed them “a million dollars,” though Findeisen concedes that there are no written contracts to substantiate that anyone was owed that amount.

77. Part 1 concludes with a preview of Part 2 of Findeisen’s CryptoZoo series. The preview features images of text messages between Paul and an unidentified person, with Findeisen narrating snippets of those messages. No context whatsoever is provided by Findeisen, but the snippets he reads begin with the unidentified person accusing Paul of stealing \$40 million in Tokens, calling him a scam artist and a liar, and stating that he “betrayed” his own community. Seemingly pleading with Paul to rectify those apparent bad acts, the unidentified person says to Paul, “U aren’t that guy,” and Paul responds, “Oh trust me bro. I am that guy.” This dramatic, cliffhanger ending leads the viewer to conclude that not only did Paul lie, steal, and scam, but that he brazenly *admitted* to it.

78. Four days later, on December 20, 2022, Findeisen published Part 2 on his YouTube account. That video was titled, “The Biggest Fraud in Logan Paul’s Scam.”



79. The “biggest fraud” referred to in the title is Ibanez, who, as discussed, led the game’s development efforts. The video details Ibanez’s extensive history of exaggerating, misrepresenting, and flat-out fabricating aspects of his personal, educational, and professional background—although none of this was known to Paul at the time Ibanez was invited to join the CryptoZoo team, or indeed until after the game was publicly announced and Egg NFTs were made available for sale to the public.

80. After delving into Ibanez’s history of deception—which included falsely claiming to be an orphan, lying about attending MIT, lying about working with the CIA, and lying about having helped the Philadelphia Eagles win a Super Bowl—the video introduced another member of the CryptoZoo team: Greenbaum. Findeisen stated in the video that he received a call from Greenbaum, who was willing to talk about his experience on the project.

81. In relevant part, Findeisen noted that Greenbaum was reluctant to speak on the record, but then stated that “he was willing to put at least put one thing on the record for me.” That “one thing” was Greenbaum’s unequivocal insistence that Ibanez was “the biggest reason” the project failed. In fact, Greenbaum explicitly told Findeisen that Ibanez “rugged” the project, referring to the concept of a “rug pull.” Thus, in sum and substance, Greenbaum explained that Ibanez fraudulently misrepresented himself, his abilities, his intentions, and his progress as far as leading the development of the game, to personally profit.

82. Greenbaum then went even further, explaining that he was willing to go on the record specifically to rebut any suggestion that Paul was involved in Ibanez’s duplicity. Greenbaum said, “I don’t want it to ever be thought that Logan’s the reason it failed. He’s not.”



83. Three days later, on December 23, 2022, Findeisen published Part 3 of his YouTube series. That video was titled, “Ending Logan Paul’s Biggest Scam.”

84. The opening monologue of the video promised viewers that Findeisen would present the “truth” about CryptoZoo and identify “who’s to blame.” To that end, the video largely focused on Findeisen’s interpretation of text messages among the founders that someone had leaked to Findeisen.

85. Findeisen began by reviewing messages discussing the ZOO Tokens and whether to conduct a pre-sale of the Tokens. Following some discussion of potential regulatory issues, it was Greenbaum who suggested to the group that instead of a pre-sale, they could do a “stealth” launch of the Token before announcing it, which would give the founders an opportunity to buy up a portion of the existing supply before it was made available to the public.

86. On June 11, 2021, the day the Token was launched, which the founders referred to as “Zoo Day,” Greenbaum deceived the other founders and began secretly buying large quantities of ZOO Tokens without the others’ knowledge or permission—activity that had a significant impact on the market capitalization of the newly-created Token.

87. In the video, Findeisen details how Greenbaum secretly created numerous crypto wallets that he used to surreptitiously purchase some \$200,000 worth of ZOO Tokens—significantly more than any of the CryptoZoo founders.

88. In the video, Findeisen explains that “this is where things first started to go wrong,” and he presents messages among the founders in which Greenbaum appears to provide a false explanation of the suspicious trading activity, and in which Paul expresses suspicion about Greenbaum’s explanation.

89. Those messages make abundantly clear that Paul had nothing whatsoever to do with Greenbaum’s illicit dealing and manipulation of the ZOO Token and, to the contrary, was outraged by it. In fact, Findeisen then details how in the lead up to the official CryptoZoo launch day in September 2021—*i.e.*, the day Egg NFTs were made publicly available for purchase—Paul and the other founders minted a new ZOO Token and airdropped an identical amount to certain holders of the original ZOO Token—while “blacklisting” others. By doing so, Paul and his team took affirmative steps to exclude wallets associated with Greenbaum so that he would be unable to further manipulate the market and jeopardize the integrity of the project for his own financial gain.

90. Only then did Findeisen reveal the full context of the text exchange he teased at the end of Part 1, in which an unidentified individual accuses Paul of stealing \$40 million in Tokens, calling him a scam artist: The unidentified individual is revealed to be Greenbaum, and the context of the exchange is Greenbaum’s complaint about Paul’s efforts to stop him from manipulating the market for Tokens and enriching himself at the expense of other buyers.

91. In other words, the full context of the exchange, which Findeisen misleadingly presented to viewers as evidence of Paul’s involvement in a scam, actually reveals the exact opposite to be true.

92. Nevertheless, despite the efforts to identify and blacklist Greenbaum's ZOO Tokens, Greenbaum still made off with a large amount of ZOO Tokens from the Zoo Day that he kept in secret crypto wallets the others were unaware of. Findeisen explained that his own investigation into blockchain transactions showed that Greenbaum was by far the biggest seller of ZOO Tokens, and that he netted more than six million dollars from improperly buying and selling ZOO Tokens without permission.

93. Findeisen further explained that his blockchain investigation revealed that Ibanez was also secretly selling ZOO Tokens, and that he made approximately \$1.7 million from doing so.

94. Conversely, Findeisen acknowledged that his investigation showed that unlike Greenbaum, neither Paul nor his manager, Jeff Levin, ever sold *any* of the ZOO Tokens they acquired on Zoo Day, which even Findeisen admitted was a "huge surprise." Findeisen acknowledged that this was perhaps the "most important thing" in terms of assigning "guilt" to those involved with CryptoZoo.

95. Findeisen also concluded that at the end of the day, the "number one problem" and the true, "boring" reason for CryptoZoo's ultimate demise, was Ibanez's failure to pay the game developers on time, despite Ibanez also netting millions of dollars from illicitly selling of ZOO Tokens.

96. Findeisen then asserted that Paul is nevertheless not "innocent" in all of this, because he was the face of CryptoZoo and ultimately failed to deliver a viable game.

97. Incredibly, only in a short portion at the end of a three-part video series repeatedly accusing Paul of operating a scam did Findeisen tacitly acknowledge that there was no evidence that Paul attempted to scam anyone, or that he even profited off of CryptoZoo at all. Findeisen's

conclusion—albeit made reluctantly and opaquely—was essentially that Paul was guilty only of putting together a team that was not up to the task and of failing to effectively manage the project. That, of course, is far different from intentionally engaging in an effort to scam people and to commit financial fraud.

**Findeisen Knew All Along that His Accusations that
Paul Engaged in a Scam Were Not True**

98. Despite referring to “Logan Paul’s Scam” in the name of each part of his CryptoZoo series, the reality is that Findeisen knew from the outset of the production and publication of his series that the notion that Paul set out to “scam” anyone was completely and utterly false.

99. By definition, an accusation that someone operated a business as a scam conveys to a listener that the person engaged in a dishonest scheme with the intent to obtain money by fraudulent means. By repeatedly accusing Paul of engaging in a scam, Findeisen suggested to his viewers that CryptoZoo was never a legitimate enterprise and that, to the contrary, Paul intended from the beginning to take participants’ money and to profit by selling NFTs and ZOO Tokens, without actually delivering a completed product.

100. But the contemporaneous communications among the founders of CryptoZoo demonstrate unequivocally that Paul’s focus was on building a fun, blockchain-based game for participants to enjoy with a like-minded community. He never set out to scam anyone, but to the contrary, he always hoped, intended, and attempted in good faith to complete a functioning game.

101. Findeisen knew all of this before publication of his CryptoZoo series because, as he acknowledged and demonstrated in the course of his series, a source had leaked to him the text messages from the CryptoZoo team’s group chat from the very beginning.

102. But unwilling to let facts get in the way of his preferred, self-serving narrative, Findeisen selectively excerpted and presented those messages in a manner intended to portray Paul as a scammer, even though the messages did not support this claim.

103. Findeisen knew, for example, that Paul was completely reliant upon Greenbaum and Ibanez for all aspects of the creation of the liquidity pool and launching of the ZOO Token, and the timing of these steps, including ensuring that they were lawfully implemented, as Paul was explicit about this reliance in his messages. To provide several examples:

- On May 16, 2021, Paul asked the co-founders, “who’s in charge of the liquidity pool blah blah blah like idk how any of that shit works.” Greenbaum responded that he was taking responsibility for it “as part of [his] role for tokenomics and daily monitoring of the pool/funds.” Paul followed up to say that they should be completely transparent with the economic aspects of the token and its distribution on the blockchain.
- On May 17, 2021, when the co-founders were discussing the potential regulatory issues that come with selling or making the ZOO Token publicly available, Paul said, “idk shit about it so yeah let’s hop on [a call] at 4pm and Jake pls guide us through / This is where I fail cuz I don’t get this part of crypto at all.”
- On May 21, 2021, Paul asked the co-founders “how we gonna launch with no product”—referring to the launch of the liquidity pool and ZOO Token—to which Ibanez responded, “[w]e have a product — let’s demo tomorrow. We have 1000% more than anyone. I bet my kids [o]n it.”
- On June 11, 2021, the day the Token was launched, Paul wrote to Greenbaum and Ibanez, “aight so can I rely on you folks to just tell me how much to buy and when it’s my turn.”
- That same day, as Paul was buying ZOO Tokens and adding to the newly created liquidity pool, all at the direction of Greenbaum, Paul wrote to his co-founders, “idk how this liquidity thing works or what the return looks like so explain it to me tomorrow sometime.”

Findeisen purposefully omitted these and other examples from his series because he knew that they flatly contradicted any serious suggestion that Paul was perpetrating a scam, as opposed to following advisors who turned out not to have the project’s best interests at heart.

104. Even worse, Findeisen affirmatively distorted the excerpts he *did* include, taking them out of context in an attempt to falsely portray Paul as a knowing participant in a nefarious money-grab.

105. For example, when addressing the founders' discussion of potential regulatory issues associated with a presale of tokens, Findeisen notes that "Not everyone wanted to be cautious" about such issues, citing as an example a message in which Paul noted that "[e]veryone does a presale with coins." According to Findeisen, this illustrated a dilemma amongst Paul and his co-founders about how they could maximize the amount of money they could make from the project while minimizing their legal exposure.

106. In addition to Findeisen purposefully omitting Paul's statement that he was relying upon Greenbaum for guidance on this piece, saying, "I don't get this part of crypto at all"—which, tellingly, came just several lines after the portion Findeisen included in his series—other messages make equally clear that Findeisen's portrayal of Paul as money-hungry was completely false.

107. Findeisen also omitted, for example, that as of August 2021, several months after the launch of the ZOO Token, the exact same text message string showed that Paul was still considering *whether to even include a token with the game at all*, asking his co-founders whether "it makes it gimmicky" and "the strength of our NFTs and the art can speak for itself / and it becomes solely collectible based / Like the banger projects rn [right now]." The ensuing dialogue makes clear that Paul only proceeded to include the Token because Greenbaum and Ibanez convinced him it was essential to the functionality of the game.

108. In fact, when Ibanez relayed to Paul that the market cap of the Token had reached \$100 million on August 16, 2021, Paul's response was "Bro who cares / Honestly fuck all that / I hope people find the stupid satisfaction we find with hatching their hybrids / Fuck the token / Fuck

everything / I want someone to laugh out loud about this:”—and then Paul sent a picture of a Pandacat, one of the hybrid animals that was to be featured in the game.

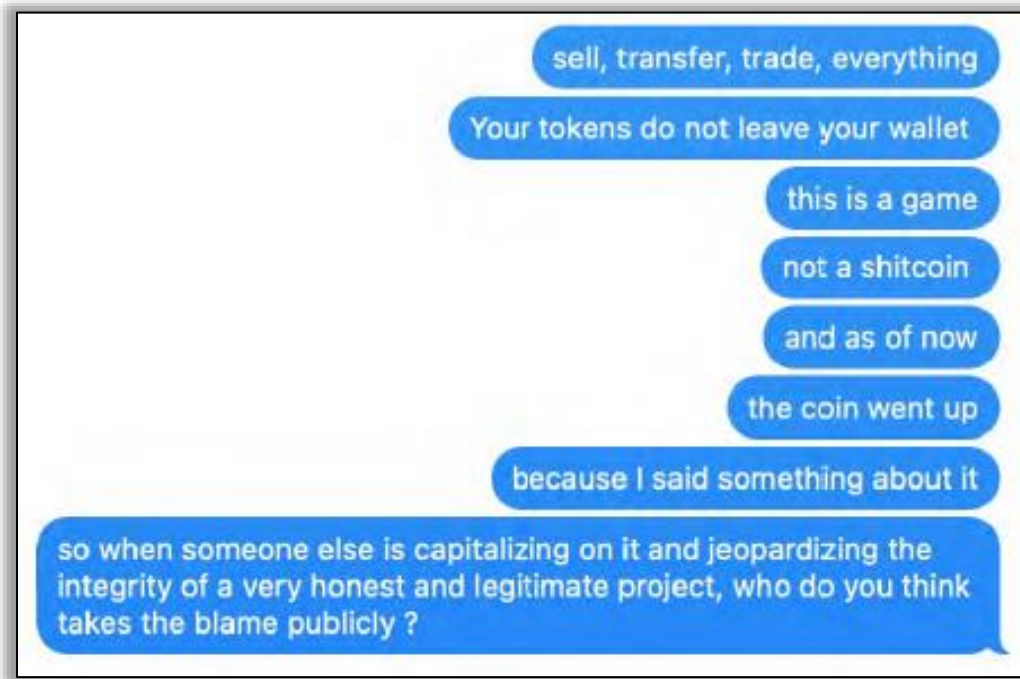
109. That same day, Paul wrote to his co-founders, “When this shit goes crazy. Everyone stay calm. I swear to god just breathe & don’t make it a big deal. We just came to make people live out their wildest imaginary dreams. Everything else is a bonus.”

110. Similarly, Findeisen discusses the founders’ Token allocations and “rules for selling,” characterizing such rules as a conspiracy amongst Paul and the other founders to manipulate the market. But Findeisen omits messages that show unequivocally that Paul’s intent was to *prevent* any market manipulation. For example, when Ibanez informed Paul and the other founders that he would be developing a “full trading strategy (buy and sell) that way we don’t peak the price (we buy gradually) & we don’t let some punk or bot sell while we’re riding the price up,” Paul’s response was, “Why are we manipulating it like that? Why would we want to drive it up? shouldn’t it just ‘be’?”

111. Having never launched a Token before, Paul’s instinct was—properly—concern over the fragility of the market and making sure nobody was in a position to control it. In other words, Findeisen knew from the messages in his possession that Paul agreed to certain selling rules for the founders in order to prevent the exact type of manipulation he nevertheless proceeded to accuse Paul of conspiring to carry out.

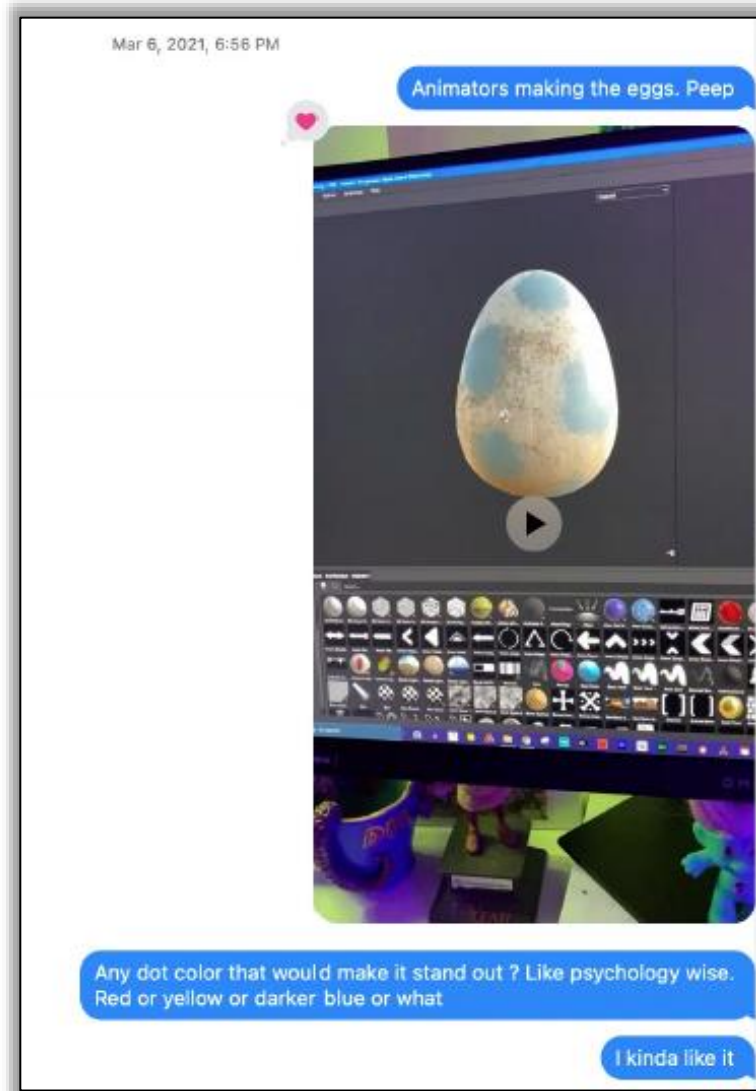
112. And when Paul learned that someone was taking advantage of the public announcement to sell Tokens in violation of the trading rules, he was livid and immediately texted his co-founders to remind them: “Your tokens do not leave your wallet. [T]his is a game. [N]ot a shitcoin. [A]nd as of now the coin went up because I said something about it so when someone else is capitalizing on it and jeopardizing the integrity of a very honest and legitimate project, who

do you think takes the blame publicly?”

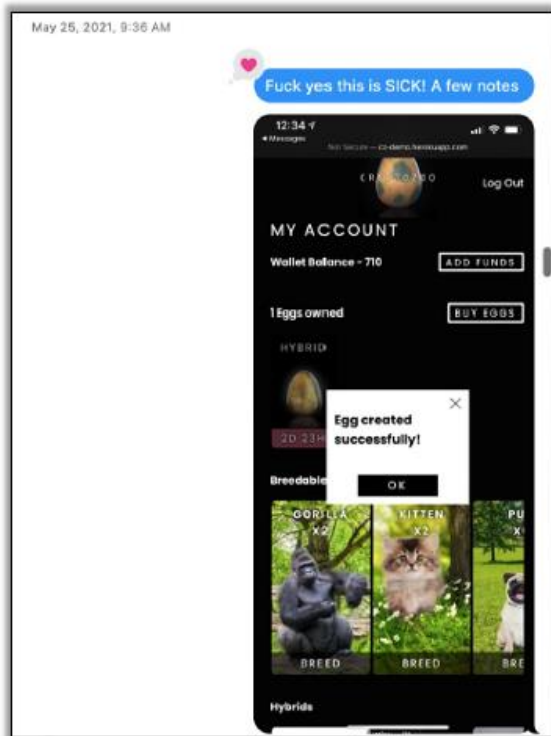


113. Findeisen also knew from these messages that—entirely inconsistent with an intent to scam—Paul had told Ibanez and Greenbaum over and over again not to rush the development of the game and consistently asked Ibanez for updates on development, that Paul provided extensive, detailed input on in-game rules and features, that Paul had no interest in announcing the game publicly until it was “perfect” and “FLAWLESSSSSS,” and that he only made such an announcement upon being repeatedly assured by Ibanez that both the Egg NFT sale and the game were “good to go.” For example:

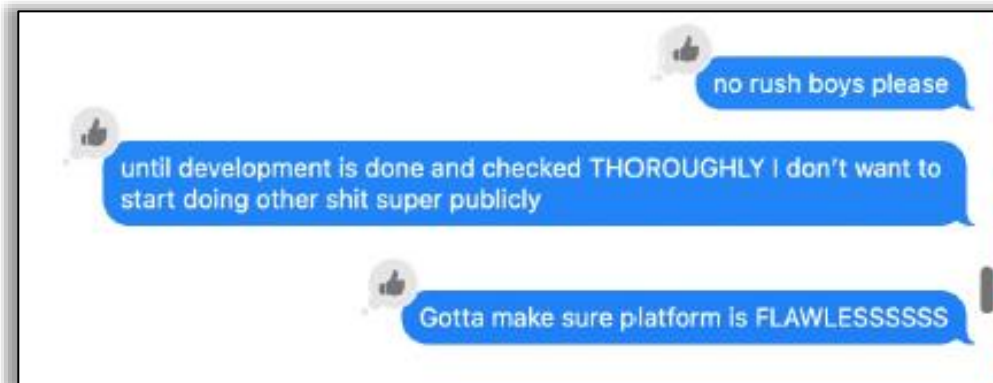
- Within days of the March 4, 2021 kick-off meeting for the game, Paul hired artists and animators to work on the game and circulated Egg renderings created by the artists to the group chat for input:



- On May 21, 2021, Ibanez assured Paul “[w]e have a product – let’s demo tomorrow” and sent the group chat a lengthy summary of the project’s progress and a to-do list that mostly related to artwork, animation, and aesthetics for the website. Ibanez also circulated a demo to demonstrate the work that had been completed for the game. After reviewing the demo, Paul added additional items to the to-do list and suggested changes for the game.
- On May 25, 2021, Ibanez alerted the group that the demo for the game was updated with Paul’s suggested changes. Paul immediately jumped in to review the updates and enthusiastically replied to the group with a screenshot of the game demo, and included additional suggestions to improve the game:

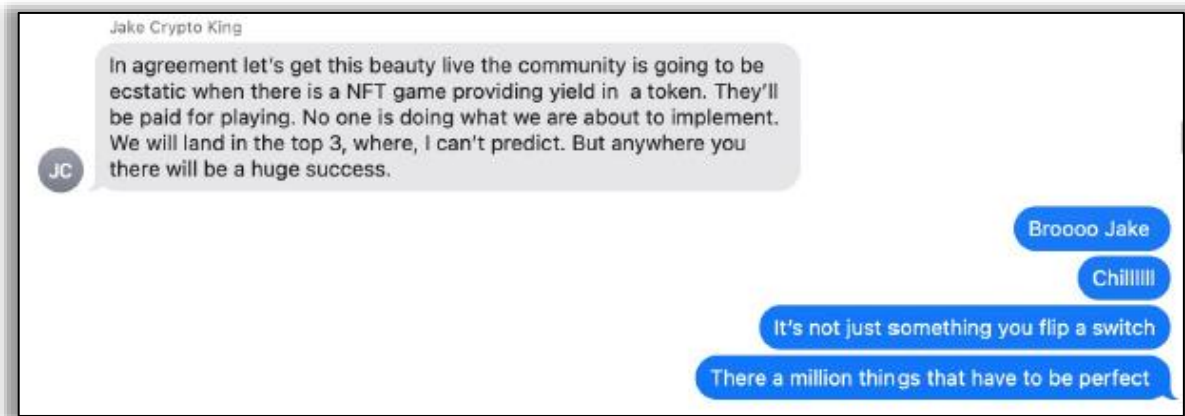


- On June 11, 2021, Paul asked about next steps in the group chat and Greenbaum and Ibanez responded with a list of tasks, including completing the website and social media accounts, setting up an online community for players on both Discord and Telegram, launching the NFT Egg sale, and—most importantly—finishing development and launching the game. Paul responded: “no rush boys please. Until development is done and checked THOROUGHLY I don’t want to start doing other shit super publicly. Gotta make sure platform is FLAWLESSSSSS.” Ibanez responded that the game would be fully tested in a couple weeks.



- On August 8, 2021, Greenbaum continued to push for a public announcement noting, “Bullish momentum right now with NFTs and coins couldn’t be more perfect.” Paul told Greenbaum to “chill,” writing, “Project needs to be perfect before we launch. Market is hot but more important we get this right.” When Greenbaum again asked

about a timing for a public announcement the next day, Paul again told him to “chill” and that a million things needed to be perfect before the game was made public.



- On August 9, 2021, Ibanez wrote in the group chat that the NFTs were ready to be sold to the public, saying “Eggs are good to go” and proposed September 1, 2021 as the date for the Egg Sale. In response, Paul asked for confirmation that everything—including the game—would be ready by then, reiterating that it “Needs to be perfect.” Ibanez confirmed everything was ready to go, responding “For Egg pre-sale 1000% ... For game also.”

114. The knowledge Findeisen had from these messages was underscored by his own investigation, which showed Paul never sold a single ZOO Token.

115. Findeisen’s allegation that Paul had wiped his hands of and abandoned the project also was false, as Paul’s team continued to try and get the project back on track all the way up until the release of Findeisen’s CryptoZoo series, and after. In fact, Paul’s team ultimately was able to successfully complete the development of the game in 2023, only to eventually realize that its release was not feasible for regulatory reasons that Paul had never previously been apprised.

116. Fundamentally, Findeisen’s repeated allegation that Paul conceived of and operated CryptoZoo as a scam also makes no sense and is inherently improbable. As an influencer whose ability to earn money is largely based on the strength of his personal brand and reputation, it would make no sense for Paul to set out to scam his own fans and supporters in a way that would inevitably be revealed, destroying his reputation in the process.

117. Despite his knowledge that it was fundamentally false to accuse Paul of operating a scam and to describe CryptoZoo as “Logan Paul’s Scam,” Findeisen persisted in doing so because he knew that accusing a public figure like Paul of engaging in a crypto scam would generate substantial viewership for his YouTube videos, earning Findeisen a higher profile and greater income in the process.

118. Additionally, on December 16, 2022—the very same day that he published his first CryptoZoo video on the Coffeezilla YouTube account—Findeisen launched a Coffeezilla account on the website “Patreon,” where he encourages his subscribers, called “patrons,” to send him donations. Findeisen’s YouTube videos, including those in the CryptoZoo series, promote and link to this Patreon account. Given the timing of the launch of that account, it is clear that Findeisen knew his videos accusing Paul of perpetrating a scam would gain a large viewership, and that he hoped many of these viewers could then be persuaded to send Findeisen money via Patreon.

119. Ironically then, despite accusing *Paul* of being a “reckless clout goblin just in it for the money,” it was *Findeisen* who scammed his own viewers by intentionally publishing a deceptive narrative, under the guise of investigative journalism, in order to personally profit from the deception.

120. Together, Findeisen’s three-part series on CryptoZoo has been viewed more than 23 million times, resulting in a widespread, false public narrative about Paul’s intentions with CryptoZoo.

**Paul Tries to Take the High Road and Focus on Doing What He Can
to Help Those Affected by the Failure of CryptoZoo**

121. Paul’s initial reaction to Findeisen’s defamatory attacks in the three-part CryptoZoo series was, understandably, one of hurt and anger. He posted a couple of response videos of his own on YouTube in which he alluded to the possibility of a lawsuit against Findeisen.

122. Recognizing the time, expense, and energy required of a lawsuit, however, Paul elected to ignore Findeisen's defamatory claims and instead focus on trying to make things right with those who had purchased CryptoZoo NFTs in anticipation of being able to play the game.

123. On January 7, 2023, Paul posted a message on social media, calling his initial reaction to the Coffeezilla videos "rash" and stating that "the war is not with Coffee." Paul expressed that he was grateful that Findeisen had brought some of the misdeeds of his former business partners to light. Paul further stated that he would seek to "make this right" and that he would be "coming forward with a plan in the near future" to do so.

124. On January 13, 2023, Paul announced an initiative whereby he pledged up to \$1.3 million of personal funds to buy back all of the base Egg and base animal NFTs from disappointed holders. Paul made this pledge even though he was not the recipient of any of the funds used to purchase the NFTs in the first place, had not profited in any way from the project, and to the contrary had incurred hundreds of thousands of dollars in expenses trying to turn it into a reality.

125. Shortly after his announcement, Paul spoke on the telephone with Findeisen to move on from the dispute. Paul actually believed that the call was productive: In relevant part, Findeisen expressed his belief that Paul was not a bad actor, but that he had gotten caught up with bad people in the CryptoZoo project. He complimented Paul's buyback announcement, stating that it was a noble thing to do and that he had never seen this type of initiative carried out.

126. Given that Findeisen had claimed all along that his motivation for publishing videos about CryptoZoo was to seek justice for the "victims," Paul hoped and expected that he and Findeisen could bury the hatchet in pursuit of that common goal.

127. Regrettably, Paul completely misjudged Findeisen's true motivations.

Despite Subjective Knowledge That the Accusation is Not True, Findeisen Continues to Falsely Accuse Paul of Scamming His Fans

128. Paul's January 2023 efforts to seek common ground with Findeisen and his announcement of the NFT buyback program appeared to bear fruit. For some six months, Findeisen refrained from repeating his false allegation that Paul operated CryptoZoo as a scam.

129. But in the summer of 2023, presumably for more clicks, Findeisen began attacking Paul again. While the nominal impetus for his renewed attention was the supposed slow pace of Paul's buyback efforts—a pace that was unsurprising considering the amount of money involved, the safeguards required to ensure that funds got to the proper recipients, and the necessity of navigating legal ramifications—the lesson that Findeisen had clearly taken from the success of his earlier videos was that hurling the “S” word at Paul was a surefire way to increase his clicks, viewership, and revenue.

130. On June 29, 2023, Findeisen published a post on his Coffeezilla account on the social media site X (formerly Twitter), which stated, “Logan Paul really is the type of dude to thank you when you expose his scam, then block you when you remind him to pay up.”



131. The post was a gross and intentional distortion of Paul's prior statements in which he referenced Coffeezilla's research as a positive in the sense that it had helped expose the wrongdoing by Paul's former business partners (who had also hoodwinked and victimized Paul). Findeisen knew this, but he intentionally conveyed to the public the false accusation that Paul was a participant in a scam and intentionally defrauded people to increase his own profile by continuing to attack a well-known celebrity.

132. Findeisen also hoped to achieve attention and publicity as he knew that he was planning to publish a new YouTube video about Paul the following day, and increased views of that video would mean greater profit for Findeisen.

133. To date, Findeisen's June 29, 2023 X post has been viewed more than 6.5 million times, and the comments on the post are universally negative toward Paul and accepting of Findeisen's claim that Paul had scammed those who bought CryptoZoo Egg NFTs or ZOO Tokens.

134. For example, commenters called Paul “evil,” accused him of “grift” and “exploit[ing] people,” accused him of operating a “scam,” and labelled him a “scumdog millionaire.”



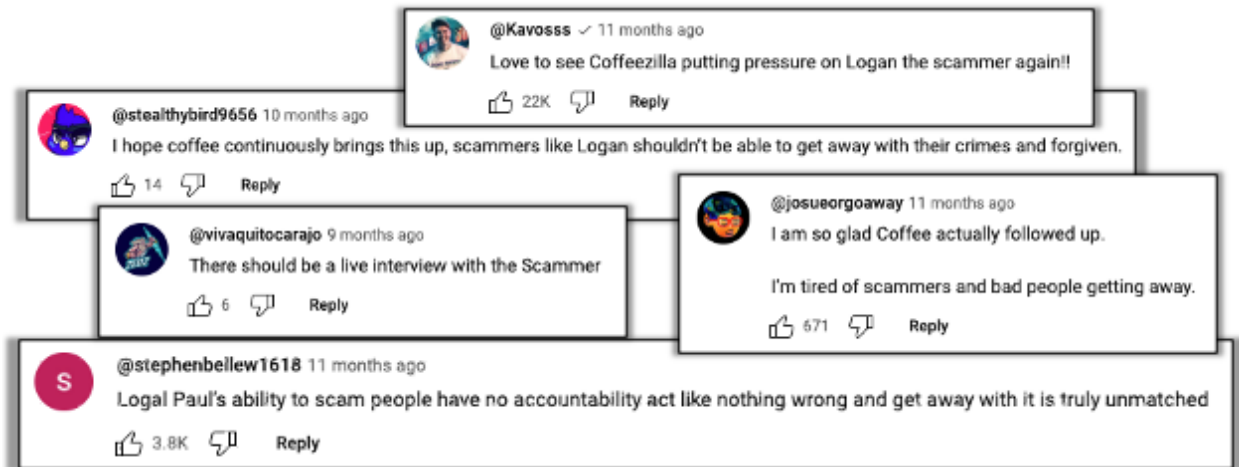
135. The following day, on June 30, 2023, Findeisen published a video to his Coffeezilla YouTube channel with the title, “Logan Paul’s Scam Isn’t Over.”

136. The video purported to be about Paul’s offer to buy out holders of CryptoZoo Egg NFTs. But in reality, the purpose of the video was to continue to lob false accusations at Paul so that Findeisen could profit from achieving more views by leveraging Paul’s fame and celebrity.

137. In addition to the title directly accusing Paul of intentionally defrauding people via a scam business, the opening lines of the video refer to CryptoZoo as “a scam created by Logan Paul.” Findeisen left no doubt that he was accusing Paul of intentionally defrauding individuals who bought Egg NFTs or ZOO Tokens by referring to those people as “his [*i.e.*, Logan Paul’s] victims,” declaring to his audience that Paul was “guilty” and his offer to reimburse buyers of Egg NFTs was an “admission” of guilt, and stating that Paul was just “pretending [he’d] changed.”

138. To date, Findeisen’s June 30, 2023 YouTube video has been viewed nearly 6 million times, and once again commenters who viewed the video were universally negative toward Paul and accepting of Findeisen’s claim that Paul had committed financial fraud.

139. For example, commenters called Paul a “thief” and a “scammer,” accused him of committing “crimes,” and suggested he should face “criminal charges.”



140. On January 4, 2024, Paul officially announced on X that his CryptoZoo Egg and NFT buyback program was operational. He posted a link to a website where holders could submit a claim for a buyback, with Paul committing up to \$2.3 million of his own money to the effort.

141. Also on January 4, 2024, Paul filed public legal claims against Ibanez and Greenbaum, against whom Paul has obtained a clerk’s default and moved for a default judgment, in which he set forth in great factual detail the true story behind the failure of CryptoZoo, including Ibanez’s and Greenbaum’s graft and unethical conduct, and Paul’s corresponding good-faith efforts to keep the project on track and develop a completed game. To a large extent, those publicly filed claims were based on the objective, contemporaneous correspondence among the CryptoZoo founders team, which Findeisen already had in his possession as of December 2022.

142. The very next day, on January 5, 2024, Findeisen published a video to the Coffeezilla YouTube page with the title, “Logan Paul’s Refund.” As with the previous video from

June 2023, the January 5, 2024 video purported to be about Paul's offer to buy out holders of CryptoZoo Egg NFTs. But again, Findeisen's real purpose in publishing the video was to make more money by airing false accusations about Paul.

143. Once again, Findeisen repeatedly accused Paul of scamming those who bought Egg NFTs or ZOO Tokens. The video opened with Findeisen proclaiming, "Logan Paul is refunding the people he scammed if they promise to stop suing him . . ." He then continued by accusing Paul of engaging in a "massive con," and ridiculing Paul's buyback efforts by saying that "Logan Paul is not a hero for doing this or making things right, he's a serial scammer who's offering a minority refund as a last-ditch effort to save his wallet and his reputation."

144. To date, Findeisen's January 5, 2024 YouTube video has been viewed over 5 million times, and once again commenters who viewed the video understood Findeisen to be accusing Paul of committing financial fraud.

145. For example, commenters called Paul "dishonest" and a "scumbag" who "needs jailtime," labelled him a "sociopath," accused him of "fraud," and called him "the guy who scammed his fans."

146. Notably, the January 5, 2024 YouTube video mentioned Paul's crossclaims multiple times and made clear that Findeisen had reviewed them in detail—indeed, he harped on the fact that some of the factual information in Paul's crossclaims was supposedly taken from Findeisen's own prior reporting, and he accused Paul of "shamelessly" ripping off his work. Findeisen continued perpetuating his false narrative that Paul is a scammer, blissfully ignoring the many instances in which the claims excerpted from communications that quite clearly showed Paul was not a participant in any supposed scam—communications that he had previously chosen not to include in his own reporting, even though he had access to them all along.

Paul's NFT Buyback Was an Enormous Success

147. Undeterred by Findeisen's renewed defamatory campaign, Paul pressed forward with the complex plan to conduct a buyback of CryptoZoo Egg NFTs from their holders.

148. Between January 4, 2024 and February 8, 2024, the buyback program received claims covering about a third of the total CryptoZoo NFTs that were purchased. At the set buyback price of 0.1 Eth each, Paul personally committed a total of 295.6 Eth to the effort.

149. The funds were officially disbursed on March 25, 2024. Given Eth's exchange rate that day, Paul was ultimately able to disburse over \$1 million of his own money to buy back Egg NFTs from NFT holders who submitted a claim.

150. It bears repeating that Paul never received any funds from the purchases of Egg NFTs in the first place. So, the funds that he dispersed as part of the buyback were not a *refund* of money made from the sale of NFTs, but rather came from Paul's own assets. Between his own investments in the game's art and development, his losses on ZOO Tokens that he bought and never sold, and the buyback program, Paul did not earn a single cent from CryptoZoo. In fact, he lost well over \$1 million on the project.

151. Nevertheless, Paul was heartened by the success of the buyback, the high level of participation, and the amount of funds that he was able to distribute to eligible holders.

152. While bad actors like Greenbaum and Ibanez, who actually made millions off of CryptoZoo, shirked accountability and did nothing to help those who lost money trying to participate in the game—and in Greenbaum's case, appear to have fled the country—Paul stepped up and did the right thing to try and bring some closure to the whole unfortunate episode.

153. Not surprisingly, Findeisen never commented on the enormous success of the buyback program or the fact that Paul resoundingly delivered on his promise.

**Paul Brings This Action to Hold Findeisen Accountable for
Intentionally Spreading Falsehoods**

154. Paul's early experience with the disastrous Japan episode taught him the importance of humility and the importance of accountability.

155. That extends first to himself. While Paul only ever had good intentions with CryptoZoo, and he worked hard to overcome the many challenges the project faced—not least of which were true bad actors who sabotaged the project for their own personal gain—Paul does not shy away from acknowledging that CryptoZoo was his brainchild, and that many individuals purchased NFTs in the hope that they could participate in the community and the game that Paul had conceived.

156. When the project failed, and Egg NFT holders were left with relatively value-less assets that could not be used for CryptoZoo gameplay, Paul did the right thing, at great financial loss to himself, to try and make whole as many eligible holders as possible through the buyback program, as was his goal before Findeisen's three-part CryptoZoo series was released.

157. But accountability must also extend to others involved in the CryptoZoo saga, whether voluntarily or involuntarily. That is why Paul has filed legal claims against Ibanez and Greenbaum for their deceptive and unethical conduct.

158. With the buyback complete and the claims against Ibanez and Greenbaum being litigated, Paul now turns his attention to Findeisen, who also needs to be held accountable for his actions.

159. As set forth above, Paul was initially willing to turn the other cheek on Findeisen's false and defamatory accusation that Paul scammed people with CryptoZoo. Despite the initial video series receiving millions of views and causing immense harm to Paul, Paul wanted to believe

that Findeisen was sincere in his professed desire to bring attention to members of the public who lost money trying to be a part of CryptoZoo.

160. But Findeisen's actions even after Paul announced the buyback program have conclusively demonstrated that Findeisen's claimed sympathies are a ruse. Like Ibanez and Greenbaum, Findeisen is simply using CryptoZoo to personally profit via deception. He is doing so by knowingly and intentionally making false claims about Paul, not in the service of any greater good, but simply in the service of making money and increasing his own profile.

161. These actions have caused, and continue to cause, enormous harm to Paul and his reputation. The social media posts and YouTube videos that Findeisen has posted since June 2023, in which he continues to falsely accuse Paul of perpetrating a scam, have collectively been viewed by more than fifteen million people.

162. At this point, Paul has unfortunately concluded that Findeisen will not stop this course of conduct unless he too is held accountable.

FIRST CLAIM FOR RELIEF

LIBEL PER SE FOR STATEMENTS IN THE JUNE 29, 2023 X POST

163. Paul repeats, realleges, and incorporates the above paragraphs as though fully set forth herein.

164. On June 29, 2023, Findeisen published a post on his Coffeezilla account on the social media site X.com (formerly Twitter).

165. The post stated, "Logan Paul really is the type of dude to thank you when you expose his scam, then block you when you remind him to pay up."

166. The post was published to a worldwide audience on X's platform, and as of May 20, 2024, it has been viewed 6.5 million times. The post remains available online at the URL:

https://x.com/coffeebreak_YT/status/1674607681590423552?lang=en. A copy of the post as it appears on X.com is attached hereto as Exhibit A.

167. The June 29, 2023 X post is of and concerning Paul.

168. The June 29, 2023 X post was intended to convey, and was understood by readers of ordinary intelligence as conveying, the factual accusation that Paul created CryptoZoo to engage in a financial scam, i.e., fraudulent financial conduct.

169. The June 29, 2023 X post is false and defamatory. The accusation that Paul operated a financial scam is one that tends to harm his reputation so as to lower him in the estimation of the community or to deter third persons from associating or dealing with him.

170. The June 29, 2023 X post is libelous per se in that it tends to affect Paul in his profession or occupation, and accuses Paul of engaging in illegal conduct.

171. By publication of the June 29, 2023 X post, Findeisen caused harm to Paul's reputation.

172. Findeisen published the June 29, 2023 X post with a reckless disregard for the truth, in that he was aware at the time of publication that the statement was false or, at a minimum, had a high degree of awareness that the statement was probably false.

173. As a direct and proximate result of the publication of the false and defamatory June 29, 2023 X post, Paul has suffered damages, including injury to reputation, embarrassment, humiliation, emotional distress, and economic damages, in an amount to be determined at trial.

SECOND CLAIM FOR RELIEF

LIBEL PER SE FOR STATEMENTS IN THE JUNE 30, 2023 YOUTUBE VIDEO, "LOGAN PAUL'S SCAM ISN'T OVER"

174. Paul repeats, realleges, and incorporates the above paragraphs as though fully set forth herein.

175. On June 30, 2023, Findeisen published a video on his Coffeezilla account on the digital video sharing site YouTube.com.

176. The video was titled, “Logan Paul’s Scam Isn’t Over.” In addition to the title directly accusing Logan Paul of intentionally defrauding people via a scam business, the opening lines of the video refer to CryptoZoo as “a scam created by Logan Paul.” Findeisen left no doubt that he was accusing Paul of intentionally defrauding individuals who bought Egg NFTs or ZOO Tokens by referring to those people as “his [Logan Paul’s] victims,” declaring to his audience that Paul was “guilty” and his offer to reimburse buyers of Egg NFTs was an “admission” of guilt, and stating that Paul was just “pretending [he’d] changed.”

177. The video was published to a worldwide audience on YouTube, and as of June 25, 2024, it has been viewed 5,899,880 times. The publication remains available online at the URL: <https://www.youtube.com/watch?v=uYYiypp6WaY>.

178. The June 30, 2023 YouTube video is of and concerning Paul.

179. The June 30, 2023 YouTube video was intended to convey, and was understood by viewers of ordinary intelligence as conveying, the factual accusation that Paul created CryptoZoo to engage in a financial scam, i.e., fraudulent financial conduct.

180. The June 30, 2023 YouTube video is false and defamatory. The accusation that Paul operated a financial scam is one that tends to harm his reputation so as to lower him in the estimation of the community or to deter third persons from associating or dealing with him.

181. The June 30, 2023 YouTube video is libelous per se in that it tends to affect Paul in his office, profession, or occupation.

182. By publication of the June 30, 2023 YouTube video, Findeisen caused harm to Paul’s reputation.

183. Findeisen published the June 30, 2023 YouTube video with a reckless disregard for the truth, in that he was aware at the time of publication that the statements were false or, at a minimum, had a high degree of awareness that the statements were probably false.

184. As a direct and proximate result of the publication of the false and defamatory June 30, 2023 YouTube video, Paul has suffered damages, including injury to reputation, embarrassment, humiliation, emotional distress, and economic damages, in an amount to be determined at trial.

THIRD CLAIM FOR RELIEF

LIBEL PER SE FOR STATEMENTS IN THE JANUARY 5, 2024 YOUTUBE VIDEO, “LOGAN PAUL’S ‘REFUND’”

185. Paul repeats, realleges, and incorporates the above paragraphs as though fully set forth herein.

186. On January 5, 2024, Findeisen published a video on his Coffeezilla account on the digital video sharing site YouTube.com.

187. The video was titled, “Logan Paul’s ‘Refund.’” In the video, Findeisen accused Paul of orchestrating a “massive con,” referred to Paul as a “serial scammer,” and referred those who bought ZOO Tokens or CryptoZoo Egg NFTs as the “people he [Logan Paul] scammed.”

188. The video was published to a worldwide audience on YouTube, and as of June 25, 2024, it has been viewed 5,161,941 times. The publication remains available online at the URL: <https://www.youtube.com/watch?v=BZNUo7orS3k&t=293s>.

189. The January 5, 2024 YouTube video is of and concerning Paul.

190. The January 5, 2024 YouTube video was intended to convey, and was understood by viewers of ordinary intelligence as conveying, the factual accusation that Paul created CryptoZoo to engage in a financial scam, i.e., fraudulent financial conduct.

191. The January 5, 2024 YouTube video is false and defamatory. The accusation that Paul operated a financial scam is one that tends to harm his reputation so as to lower him in the estimation of the community or to deter third persons from associating or dealing with him.

192. The January 5, 2024 YouTube video is libelous per se in that it tends to affect Paul in his office, profession, or occupation.

193. By publication of the January 5, 2024 YouTube video, Findeisen caused harm to Paul's reputation.

194. Findeisen published the January 5, 2024 YouTube video with a reckless disregard for the truth, in that he was aware at the time of publication that the statements were false or, at a minimum, had a high degree of awareness that the statements were probably false.

195. As a direct and proximate result of the publication of the false and defamatory January 5, 2024 YouTube video, Paul has suffered damages, including injury to reputation, embarrassment, humiliation, emotional distress, and economic damages, in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Logan Paul respectfully requests that the Court award him relief against Defendants as follows:

196. Actual and compensatory damages in excess of \$75,000, as well as interest, reasonable attorneys' fees, and costs, as allowed by law;

197. Punitive damages, as allowed by law; and

198. Such other and further relief as the Court deems appropriate.

JURY TRIAL DEMAND

Logan Paul demands trial by jury for all claims and issues that are so triable.

Date: June 27, 2024

/s/ Shelby O'Brien

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