

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF KENTUCKY
PADUCAH DIVISION

MIKE SPINDLER, CARL CANADY, ADAM)
MOYERS, BRAYDEN REINCE, THOMAS)
BARRATH, ALEXANDRE DUTRISAC,)
LANCE HUNTER, ADAM KNAUER,)
ARNOLDAS KURBANOVAS, EDWARD)
ROJAS, DEREK DURST, ARNOLD VILLA,)
PEDRO VITERI, and, *on Behalf of Themselves*)
and All Others Similarly Situated,)

Case No.: 5:22CV-137-BJB

Plaintiffs,

JURY DEMAND

v.

JUST A BIT OF COIN, LTD,)
STEVEN DRAWDY, and GEORGE)
LAVOY GRAHAM)
Defendants.)

REPRESENTATIVE CLASS ACTION COMPLAINT

COME NOW the Plaintiffs, Mike Spindler, Carl Canady, Adam Moyers, Brayden Reince, Thomas Barrath, Alexandre Dutrisac, Lance Hunter, Adam Knauer, Arnoldas Kurbanovas, Edward Rojas, Derek Durst, Arnold Villa, and Pedro Viteri, (collectively “Named Plaintiffs”), on behalf of themselves and all others similarly situated, by and through their undersigned counsel, and state as follows:

NATURE OF THE COMPLAINT

1. Named Plaintiffs bring this action against Defendants Just a Bit of Coin, Ltd, Steven Drawdy, and George Lavoy Graham for damages resulting from the allegations set forth below. Named Plaintiffs allege, on behalf of themselves and all others similarly situated, that Defendants used wire communications in interstate commerce to fraudulently or negligently induce them to

enter contracts to purchase Bitcoin mining machines for which Defendants accepted payment but which they did not intend to and have not delivered and for which they have refused to issue refunds.

JURISDICTION AND VENUE

2. This Court has diversity jurisdiction of this action pursuant to 28 U.S.C. § 1332(a) because it is between citizens of different states and a foreign country, and the amount in controversy is greater than \$75,000.00, exclusive of interests and costs. The Court further has diversity jurisdiction pursuant to 28 U.S.C. § 1332(d) because this matter is a proposed class action involving citizens of states and of a foreign country bringing claims against citizens of a state for which the total number of class members is unknown but whose aggregate claims, upon information and belief, exceed \$5,000,000.00 in value.

3. This Court has supplemental jurisdiction over the Plaintiffs' state law claims pursuant to 28 U.S.C. § 1367 because they derive from a common nucleus of operative fact and are so related to the claims within the Court's original jurisdiction that they are substantial parts of the same case or controversy under Article III of the United States Constitution.

4. This Court has personal jurisdiction over Defendant Just a Bit of Coin, Ltd, because it purposefully conducted business within McCracken County, Kentucky, which is located within this judicial district, and its actions had effects in this district.

5. This Court also has personal jurisdiction over Defendants Steven Drawdy and George Lavoy Graham because those Defendants are alter egos of Defendant Just a Bit of Coin, Ltd since the individual Defendants, upon information and belief, own or control the corporate Defendant and, through their control, establish the policies and practices to which the Named Plaintiffs and the putative members of this class action were subjected.

6. Venue is proper in this court pursuant to 28 U.S.C. § 1391(b) because a substantial part of the acts giving rise to this lawsuit occurred in this judicial district and Defendants conducted business and entered into contracts in McCracken County, Kentucky, which is located within this judicial district.

PARTIES

A. **Plaintiffs**

Named Plaintiffs

7. Plaintiff Mike Spindler was, at all relevant times, a resident of Paducah, McCracken County, Kentucky who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

8. Plaintiff Carl Canady was, at all relevant times, a resident of Wichita, Kansas who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

9. Plaintiff Adam Moyers was, at all relevant times, a resident of Paducah, McCracken County, Kentucky who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

10. Plaintiff Brayden Reince was, at all relevant times, a resident of Greenville, South Carolina who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

11. Plaintiff Thomas Barrath was, at all relevant times, a resident of Portland, Oregon who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

12. Plaintiff Alexandre Dutrisac was, at all relevant times, a resident of Canada who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

13. Plaintiff Lance Hunter was, at all relevant times, a resident of Jerome, Idaho who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

14. Plaintiff Adam Knauer was, at all relevant times, a resident of Albertville, Minnesota who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

15. Plaintiff Arnoldas Kurbanovas was, at all relevant times, a resident of Albany, New York who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

16. Plaintiff Edward Rojas was, at all relevant times, a resident of Katy, Texas who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

17. Plaintiff Derek Durst was, at all relevant times, a resident of Harrison City, Pennsylvania who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

18. Plaintiff Arnold Villa was, at all relevant times, a resident of Lacey, Washington who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

19. Plaintiff Pedro Viteri was, at all relevant times, a resident of Charleston, South Carolina who contracted with Defendants and paid a substantial sum of money to Defendants in exchange for Bitcoin mining machines that Defendants failed to provide.

Representative Action Members

20. The putative members of the representative action are similarly situated in that they (1) were fraudulently induced into a business transaction as result of Defendants' promises, (2) entered a contract with Defendants to purchase Bitcoin mining machines, (3) paid Defendants the requested contract amount following each business interaction, and (4) never received the machines for which they paid nor any refund of their payment.

B. Defendants

21. Defendant Just a Bit of Coin, Ltd is a Georgia corporation with its principal place of business located at 4620 Country Glen Cir, Grovetown, GA 30813. Defendant Just a Bit of Coin, Ltd.'s registered agent is Defendant Steven Drawdy, who may be served at 4620 Country Glen Cir, Grovetown, GA 30813.

22. Defendant Steven Drawdy is the Chief Executive Officer, Chief Financial Officer, and Secretary of Defendant Just a Bit of Coin, Ltd. Upon information and belief, Defendant Drawdy owns and/or controls the corporate Defendant either solely or in conjunction with the other individual Defendant. Defendant Drawdy may be served at 4620 County Glen Circle, Grovetown, GA 30813.

23. Upon information and belief, Defendant George Lavoy Graham was the Chief Financial Officer of Defendant Just a Bit of Coin, Ltd from December 2021 to January 2022, a period during which the occurrences giving rise to this action occurred. Defendant Graham may be served at 4622 Country Glen Circle, Grovetown, GA 30813.

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