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7
8 Attorney for Plaintiff
9 Troy Anthony Woody

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 TROY ANTHONY WOODY, an individual,
13 Plaintiff,

14 vs.

15 ZORT Inc., a Delaware corporation, ADAM IZA
16 aka ADAM ASAAD IZA aka AHMED FAIQ, an
17 individual; IRIS AU, an individual; ENZO
18 ZELOCCHI, an individual; and, DOES 1-25,
19 inclusive,
20 Defendants.

CASE NO. **22STCV06878**
Civil Unlimited

COMPLAINT FOR DAMAGES FOR:

- 21 **1) CIVIL CONSPIRACY;**
- 22 **2) ASSAULT;**
- 23 **3) FALSE IMPRISONMENT;**
- 24 **4) INTENTIONAL INFLICTION OF**
EMOTIONAL DISTRESS;
- 25 **5) CONVERSION;**
- 26 **6) VIOLATION OF THE**
RACKETEER INFLUENCED AND
CORRUPT ORGANIZATIONS
ACT, 18.U.S.C. § 1961, et seq.;

27 [DEMAND FOR TRIAL BY JURY]

28 Plaintiff Troy Anthony Woody alleges as follows:

PARTIES

1. Plaintiff Troy Anthony Woody (“Woody”) is an individual, and at all times relevant to this Complaint was a resident of the State of California.

1 **GENERAL ALLEGATIONS**

2 **Nature of the Action**

3 9. This case involves the theft of approximately 7100 Bitcoin and some alternative
4 cryptocurrency collectively worth approximately \$284,500,000.00 in today’s value. Around ten years
5 ago, when Woody was a teen, he began mining the Bitcoin by creating and validating cryptocurrency
6 transactions on a blockchain network and had amassed a significant amount of cryptocurrency which
7 Woody stored access to in cryptocurrency wallets on several devices. The substantial portion of Bitcoins
8 are on Bitcoin Core which is a hardware wallet that requires access from Woody’s laptop devices to
9 access to transfer funds. In addition, Woody had several smartphones with cryptocurrency that used the
10 blockchain.com app which contained access to transfer funds.

11 10. On the evening of September 1, 2018, Woody along with friend Eric Taylor (“Taylor”)
12 and Defendants ZELOCCHI and IZA collectively met for a dinner, planned and arranged by Defendant
13 ZELOCCHI. ZELOCCHI’s stated purpose for this dinner was to discuss cryptocurrency investing and
14 opportunities.

15 11. Only a few hours later, on September 2, 2018, at approximately 1:45 am, Woody, Taylor
16 and friend Michelle Masters (“Masters”), were peacefully gathered at an apartment located at 7400
17 Hollywood Blvd. ZELOCCHI contacted Taylor to come down to lobby. There Taylor was assaulted by
18 ZELOCCHI and IZA, and pills were forced into his mouth to ingest. Taylor was handcuffed, and his
19 apartment keys were taken from him and used by IZA to open the door of the apartment where Woody
20 was with his then girlfriend Masters. IZA was wearing a mask and entered the apartment. ZELOCCHI
21 did not participate in the entry.

22 12. IZA made his entry into the apartment brandishing a 9MM semi-automatic handgun,
23 claiming to be an agent of the FBI and flashed a badge. IZA then gave verbal instructions to not make
24 any moves and to follow instructions. IZA then assaulted Woody and Masters and demanded Woody
25 hand over his Rolex watch and his wallet. IZA then handcuffed Woody’s hands and his legs and pulled
26 out the handgun clip to show Woody that there were bullets in the gun so that Woody would be
27 compliant. IZA then proceeded to confiscate a Phillip Plein shirt and Phillip Plein matching pants that
28 was similar to the outfit that Woody had worn earlier that evening but was clear that IZA’s focus was on

1 the theft of the smartphones and laptops which he seized, along with the watch and wallet and proceeded
2 to aim the handgun at the direction of Woody and pulled the trigger as Woody watched in horror.
3 Fortunately, the handgun did not fire as IZA rushed out to leave the apartment.

4 13. The following items owned by Woody were stolen by IZA, collectively “Stolen Items”:

- 5 • HP Spectre x360 (Model 15-bl112dx) laptop, black color, purchased on 02/23/2018 for
6 \$1,536.99 containing 2000 Bitcoin worth approximately \$80,000,000.00 in today’s value;
- 7 • Lenovo laptop black/grey color containing 5000 Bitcoin worth approximately
8 \$200,000,000.00 in today’s value;
- 9 • Hewlett Packard laptop black/grey color containing 20 Bitcoin worth approximately
10 \$800,000.00 in today’s value;
- 11 • Blackberry smartphone containing 50 Bitcoin worth approximately \$2,000,000.00 in
12 today’s value;
- 13 • Samsung Galaxy 9 Plus Edge dark blue or black smartphone containing 20 Bitcoin worth
14 approximately \$800,000.00 in today’s value;
- 15 • Samsung Galaxy 9 Plus Edge dark blue or black smartphone containing various
16 cryptocurrency including Altcoins worth approximately \$500,000 in today’s value;
- 17 • iPhone 7 Plus gold color smartphone, containing 10 Bitcoin worth approximately
18 \$400,000.00 in today’s value.
- 19 • iPhone 6s gold color smartphone;
- 20 • Yellow Gold Rolex Submariner (Reference # 116618 LB) worth approximately \$50,000.
- 21 • Phillip Plein outfit consisting of shirt and matching pants worth approximately \$3,000.
- 22 • Wallet containing personal identification, credit cards, debit cards and cash in the
23 approximate amount of \$3,000.

24 14. Woody, along with Taylor and Masters, were in a state of shock after the incident.

25 Woody grabbed what few personal items he had and fled the scene in fear of his safety. A friend of
26 Woody then rented an Airbnb apartment and Woody, along with Taylor and Masters hid out for a couple
27 of days during which Defendant IZA and Defendant ZELOCCHI attempted to contact him repeatedly to
28

1 ask for the password access to the devices they could not access. Defendant IZA and Defendant
2 ZELOCCHI made no attempt to hide that they were behind the theft and assault.

3 15. On or about September 4, 2018, Woody came out of hiding and went directly to the
4 police station to file a police report. Woody explained to the police that (A) it was ZELOCCHI and IZA
5 who attacked Taylor in the apartment lobby and (B) he could identify IZA as the assailant who entered
6 the apartment from his voice and body type and (C) his laptops and smartphones were stolen. The
7 officer stated that these kinds of things happen often and there was not much the LAPD could do.

8 16. The assault on Woody and theft of Woody's devices and subsequent theft of Woody's
9 cryptocurrency was devastating for Woody. Woody was deeply affected in the immediate days after the
10 event and has been in a severe state of distress both mentally and emotionally since the incident. This
11 cryptocurrency accounted for most of Woody's net worth at the time it was stolen and has left Woody in
12 financial dire straits since.

13
14 **FIRST CAUSE OF ACTION**

15 **FOR CIVIL CONSPIRACY**

16 **(Against Defendants IZA, ZELOCCHI, and Does 1-10)**

17 17. Plaintiff incorporates herein by this reference as though set forth in full paragraphs 1-16
18 of the Complaint as though fully set forth herein.

19 18. Defendant IZA and Defendant ZELOCCHI formed and enacted a conspiracy to deprive
20 Plaintiff Woody of his cryptocurrency.

21 19. Defendant IZA and Defendant ZELOCCHI had a meeting of the minds on the object to
22 be achieved and the course of action for accomplishing the resulting theft of the devices and the
23 cryptocurrency contained on those devices.

24 20. Stealing the devices containing the cryptocurrency was an overt act unlawful act in
25 furtherance of that conspiracy.

26 21. Defendant ZELOCCHI was aware that Defendant IZA planned to commit the assault,
27 false imprisonment, and theft against Woody.

1 22. Defendant ZELOCCHI agreed with Defendant IZA's intention that assault, false
2 imprisonment, and theft be committed against Woody.

3 23. Plaintiff Woody incurred damages as a proximate result of Defendants' conspiracy to
4 steal Plaintiff's cryptocurrency.

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6 **SECOND CAUSE OF ACTION**

7 **FOR ASSAULT**

8 **(Against Defendants IZA, ZELOCCHI, and Does 1-10)**

9 24. Plaintiff incorporates herein by this reference as though set forth in full paragraphs 1-23
10 of the Complaint as though fully set forth herein.

11 25. Defendant IZA, individually and Defendant ZELOCCHI, took acts which were intended
12 to cause harmful or offensive contact with Woody and reasonably placed him in fear of a harmful or
13 offensive contact from them.

14 26. Defendant IZA, individually, charged violently at Woody while he was peaceably in his
15 apartment, brandishing a 9MM semi-automatic handgun, claiming to be an agent of the FBI and flashed
16 a badge. IZA then gave verbal instructions to not make any moves and to follow instructions. IZA then
17 handcuffed Woody and Masters with the design on stealing Woody's devices which he did and then left
18 the apartment whereby the assault and imprisonment foisted upon Woody ended.

19 27. As a proximate result of Defendant IZA and Defendant ZELOCCHI's assault, Woody,
20 has been damaged in an amount in excess of the jurisdictional limit of this Court, the exact amount to be
21 proved at trial, but believed to exceed \$25,000.00. Woody's damages also include, but are not limited to,
22 emotional distress, shock, stress, fear and mental suffering.

23 28. Woody, is informed and believes, and based on that information and belief alleges, that
24 Defendant IZA and Defendant ZELOCCHI's, aforementioned conduct was intended by said Defendant
25 IZA, and Defendant ZELOCCHI, to cause injury to Woody, and/or was despicable conduct carried on
26 by said Defendant IZA, and Defendant ZELOCCHI, with a willful and conscious disregard of Woody's
27 rights, or subjected him to cruel and unjust hardship in conscious disregard of his rights and acted with
28 knowledge of the probable dangerous consequences to the interests of Woody, and deliberately failed to

1 avoid those consequences, such as to constitute malice, oppression, or fraud under California Civil Code
2 § 3294, thereby entitling the Woody to recover punitive damages in an amount appropriate to punish or
3 set an example of Defendant IZA and Defendant ZELOCCHI.

4
5 **THIRD CAUSE OF ACTION**
6 **FOR FALSE IMPRISONMENT**

7 **(Against Defendants IZA, ZELOCCHI, and Does 1-10)**

8 29. Plaintiff incorporates herein by this reference as though set forth in full paragraphs 1-28
9 of the Complaint as though fully set forth herein.

10 30. Defendant IZA, individually and Defendant ZELOCCHI, took acts which were intended
11 to cause harmful or offensive contact with Woody and reasonably placed him in fear of a harmful or
12 offensive contact from them.

13 31. Defendant IZA, individually, charged violently at Woody while he was peaceably in his
14 apartment, brandishing a 9MM semi-automatic handgun, claiming to be an agent of the FBI and flashed
15 a badge. IZA then gave verbal instructions to not make any moves and to follow instructions. IZA then
16 handcuffed Woody and Masters with the design on stealing Woody's devices which he did and then left
17 the apartment whereby the assault and imprisonment foisted upon Woody ended.

18 32. As a proximate result of Defendant IZA and Defendant ZELOCCHI's assault, Woody,
19 has been damaged in an amount in excess of the jurisdictional limit of this Court, the exact amount to be
20 proved at trial, but believed to exceed \$25,000.00. Woody's damages also include, but are not limited to,
21 emotional distress, shock, stress, fear and mental suffering.

22 33. Woody, is informed and believes, and based on that information and belief alleges, that
23 Defendant IZA and Defendant ZELOCCHI's, aforementioned conduct was intended by said Defendant
24 IZA, and Defendant ZELOCCHI, to cause injury to Woody, and/or was despicable conduct carried on
25 by said Defendant IZA, and Defendant ZELOCCHI, with a willful and conscious disregard of Woody's
26 rights, or subjected him to cruel and unjust hardship in conscious disregard of his rights and acted with
27 knowledge of the probable dangerous consequences to the interests of Woody, and deliberately failed to
28 avoid those consequences, such as to constitute malice, oppression, or fraud under California Civil Code

1 § 3294, thereby entitling the Woody to recover punitive damages in an amount appropriate to punish or
2 set an example of Defendant IZA and Defendant ZELOCCHI.

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4 **FOURTH CAUSE OF ACTION**

5 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

6 **(Against Defendants IZA, ZELOCCHI, and Does 1-10)**

7 34. Plaintiff incorporates herein by this reference as though set forth in full paragraphs 1-33
8 of the Complaint as though fully set forth herein.

9 35. Defendant IZA's conduct caused Plaintiff Woody to suffer severe emotional distress.

10 36. Defendant IZA's conduct was outrageous by any measure. This outrageous conduct
11 includes:

- 12 1. luring Woody into dinner to confirm the target's property to be stolen;
- 13 2. forcing access to Woody's place of rest (his girlfriend's apartment) with a 9MM semi-
14 automatic handgun under the false pretense that he was an FBI agent;
- 15 3. forcibly restraining Woody with handcuffs;
- 16 4. taking Woody's electronic devices and the Bitcoin contained on those devices.

17 37. Defendant IZA acted with reckless disregard of the probability that Woody would suffer
18 emotional distress.

19 38. Woody suffered severe emotional distress as a result of Defendant IZA's actions.

20 39. Defendant IZA's conduct was a substantial factor in causing Woody's severe emotional
21 distress.

22 All other defendants are liable for the intentional infliction of emotional distress on Woody as a result of
23 their conspiracy.

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1 **FIFTH CAUSE OF ACTION**

2 **FOR CONVERSION (Taking of Laptops and Smartphones)**

3 **(Against Defendants IZA, ZELOCCHI, and Does 1-10)**

4 40. Plaintiff incorporates herein by this reference as though set forth in full paragraphs 1-39
5 of the Complaint as though fully set forth herein.

6 41. Defendant IZA and Defendant ZELOCCHI wrongfully exercised control over Plaintiff
7 Woody's personal property, the electronic devices listed within the Stolen Items as defined herein, by
8 taking those devices from Woody with force and without permission.

9 42. Plaintiff Woody owned the electronic devices (laptop and smartphones) which are here at
10 issue, as well as the contents of those devices, which includes access to the Bitcoin here at-issue.

11 43. Defendant IZA substantially interfered with Woody's property by knowingly or
12 intentionally taking possession of the devices and refusing to return them to Plaintiff after Plaintiff
13 Woody demanded their return from Defendants.

14 44. Woody did not consent to IZA's taking.

15 45. Woody was severely harmed by the loss of his property and its contents.

16 46. ZELOCCHI and IZA's conduct was a substantial factor in causing Woody's harm.

17 47. Woody now seeks the return of his property, including the contents present at the time his
18 property was taken from him.

19 **SIXTH CAUSE OF ACTION**

20 **FOR VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT**

21 **ORGANIZATIONS ACT, 18 U.S.C. §1961 *et seq.***

22 **(Against All Defendants)**

23 48. Plaintiffs incorporate herein by this reference as though set forth in full paragraphs 1-47
24 of the Complaint as though fully set forth herein.

25 49. As described above, Defendant IZA feloniously took Woody's personal property,
26 including the bitcoins contained therein. IZA took Woody's personal property from Woody's person or
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28

1 immediate presence, against his will, and accomplished this by means of force or fear – by threatening
2 Woody with a 9MM semi-automatic handgun.

3 50. Defendant IZA did this in coordination (in conspiracy) with defendant ZELOCCHI.

4 51. Thereafter, Defendant IZA and Defendant ZELOCCHI obtained the Bitcoins from the
5 personal property of Woody. Those Bitcoins rightfully belonged to Woody.

6 52. After wrongfully obtaining Woody’s Bitcoins, Defendant IZA and Defendant
7 ZELOCCHI brought further individuals into their racketeering enterprise. One such individual was
8 Defendant AU, who helped IZA and ZELOCCHI take Woody’s Bitcoins, and exchange them for U.S.
9 Dollars.

- 10 • The Lenovo laptop had Bitcoin Core and Electrum; the Hewlett Packard laptop as well as
11 the two Samsung S9 smartphones and iPhone 7 Plus smartphones had blockchain.com. In
12 total, the cryptocurrency worth approximately \$284,500,000.00 in today’s value.

13 53. Defendant IZA would transfer smaller amounts in multiple transfers over time to other
14 cryptocurrency wallets, including transfers to accounts in the name of Defendant ZELOCCHI. From
15 these wallets, IZA would transfer funds into his Altonomy OTC (“Over-The-Counter”) securities trading
16 platform which would subsequently then issue bank wire transfers into offshore bank accounts. Some of
17 these OTC trades were at times completed by utilizing Telegram software as user “@zorttrader”.

18 54. Defendant IZA further used a cryptocurrency called Zort and IZA and his conspirators
19 have actively participated in currency manipulation of Zort cryptocurrency in order to artificially inflate
20 or lower the value of the Zort cryptocurrency to enable the transfer of Woody’s Bitcoins into U.S.
21 Dollars.

22 55. Defendant IZA has also operated Defendant ZORT Inc., a Delaware corporation, which
23 is an artificial intelligence cryptocurrency trading platform, to further facilitate the transfer of Woody’s
24 Bitcoins into U.S. Dollars. Defendant ZORT Inc. and related subsidiaries and the respective offshore
25 bank accounts were used by IZA to funnel and transfer funds into domestic accounts, and to hold
26 property, sometimes in his name and the name of his conspirators, including Defendant AU. IZA would
27 instruct AU to purchase assets, including vehicles. IZA has paid AU hundreds of thousands of dollars as
28 well as purchased jewelry and vehicles for AU in exchange for knowingly cooperating.

1 **WHEREFORE**, Plaintiff prays for judgment against Defendants as follows:

2 1. For damages to be determined at trial, including, but not limited to, compensatory
3 damages, which are believed to exceed \$284,556,000.00.

4 2. For punitive and exemplary damages in an amount appropriate to punish or set an
5 example of Defendant IZA, individually and Defendant ZELOCCHI.

6 3. For interest, including prejudgment interest and other economic and consequential
7 damages in such amounts as may be determined at trial;

8 4. For costs of suit incurred herein.

9 5. For such other and further relief as the Court may deem proper.

10 **For RICO Cause of Action:**

11 1. For Actual Damages

12 2. For Treble Damages Pursuant to 18 U.S.C. §1964(c)

13 3. For Attorney's Fees Pursuant to 18 U.S.C. §1964(c)

14 4. For Costs of Suit

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16 DATED: February 24, 2022

17 By: *Ronnie Miranda*
18 RONNIE MIRANDA
19 Attorney for Plaintiff
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