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9 Troy Anthony Woody

FILED
Superior Court of California
County of Los Angeles
12/27/2022

David W. Slayton, Executive Officer / Clerk of Court
By: S. Alexander Deputy

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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**

15 TROY ANTHONY WOODY, an individual,
16
17 Plaintiff,

18 vs.

19 ZORT Inc., a Delaware corporation, ADAM IZA
20 aka ADAM ASAAD IZA aka AHMED FAIQ, an
21 individual; IRIS AU, an individual; ENZO
22 ZELOCCHI, an individual; and, DOES 1-25,
23 inclusive,
24 Defendants.

CASE NO. 22STCV06878

Civil Unlimited

Assigned to Hon. Rupert A. Byrdsong
Dept. 28

25 **AMENDED COMPLAINT FOR DAMAGES**
26 **FOR:**

- 27 1) **CIVIL CONSPIRACY;**
- 28 2) **CONVERSION;**
- 3) **VIOLATION OF THE
RACKETEER INFLUENCED AND
CORRUPT ORGANIZATIONS
ACT, 18.U.S.C. § 1961, et seq.;**

[DEMAND FOR TRIAL BY JURY]

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.
2. Defendant ZORT Inc. is a corporation organized and existing under and by virtue of the laws of the State of Delaware and is duly authorized to conduct business in the State of California.

1 3. Defendant Adam IZA aka Adam Asaad IZA aka Ahmed Faiq (“IZA”) is an individual,
2 and at all times relevant to this Complaint was a resident of the State of California.

3 4. Defendant Enzo ZELOCCHI (“ZELOCCHI”) is an individual, and at all times relevant to
4 this Complaint was a resident of the State of California.

5 5. Defendant Iris AU (“AU”) is an individual, and at all times relevant to this Complaint
6 was a resident of the State of California.

7 6. The true names and capacities, whether individual, corporate, associate, or otherwise, of
8 Defendants Does 1 through 25, inclusive, are unknown to Plaintiff, who therefore sue Defendants by
9 such fictitious names. Plaintiffs will seek leave of Court to amend this pleading to show the true names
10 and capacities of such Defendants when the same have been ascertained. Plaintiff is informed and
11 believes, and on that ground alleges that each of the fictitiously named Defendants are responsible to
12 Plaintiff for the injuries and damages suffered or alleged herein and are subject to the jurisdiction of the
13 Court herein for the relief requested.

14
15 **JURISDICTION AND VENUE**

16 7. Plaintiff is informed and believes, and based thereon allege, that this Court has proper
17 jurisdiction for this action and venue is proper here because acts and omissions which are the subject of
18 this action occurred in this Judicial District in the County of Los Angeles, State of California.

19 8. Plaintiff is further informed and believes, and based thereon allege, that this Court has
20 proper jurisdiction for this action because the acts of Defendant ZELOCCHI, Defendant IZA, Defendant
21 AU, Defendant ZORT Inc., and Does 1-25 took place in this Judicial District in the County of Los
22 Angeles, State of California, at the time during which Defendant ZELOCCHI, Defendant IZA,
23 Defendant AU, and Does 1-25 resided in this Judicial District in the County of Los Angeles, State of
24 California and Defendant ZORT Inc. conducts sufficient business in the State of California.

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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 and the dinner took place at 25 Degrees, 7000 Hollywood Blvd., Hollywood Roosevelt
15 Hotel, Los Angeles, CA 90028.

16 11. THE ROBBERY: Only a few hours later, on September 2, 2018, at approximately 1:45
17 am, Woody, Taylor and friend Michelle Masters ("Masters"), were peacefully gathered at an apartment
18 located at 7400 Hollywood Blvd. ZELOCCHI contacted Taylor to come down to lobby. There Taylor
19 recognized ZELOCCHI and IZA from the dinner earlier and ZELOCCHI and IZA subsequently forced
20 pills into Taylor's mouth to ingest. ZELOCCHI and IZA proceeded to handcuff Taylor and further
21 assault Taylor while asking him where the electronic devices were located. Taylor's apartment keys
22 were taken from him and used by IZA to open the door of the apartment where Woody was with his then
23 girlfriend, Masters. IZA was wearing a mask and entered the apartment. ZELOCCHI did not participate
24 in the entry. Almost instantly, Woody could identify IZA as the assailant who entered the apartment
25 from his voice and body type after having had dinner with him just a few hours earlier.

26 12. IZA made his entry into the apartment brandishing a 9MM semi-automatic handgun,
27 claiming to be an agent of the FBI and flashed a badge. IZA then gave verbal instructions to not make
28 any moves and to follow instructions. IZA then assaulted Woody and Masters and demanded Woody

1 hand over his Rolex watch and his wallet. IZA then handcuffed Woody's hands and his legs and pulled
2 out the handgun clip to show Woody that there were bullets in the gun so that Woody would be
3 compliant. The handcuffing caused Woody significant pain and discomfort throughout the ordeal. IZA
4 then proceeded to confiscate a Phillip Plein shirt and Phillip Plein matching pants that was similar to the
5 outfit that Woody had worn earlier that evening but it was clear that IZA's focus was on the theft of the
6 smartphones and laptops which he seized, along with the watch and wallet which IZA placed in bag
7 owned by Woody that was in the apartment. IZA then paused for a moment to take a picture of Woody
8 handcuffed by using his own mobile device. Woody then stated to the assailant that he knew it was IZA
9 which caused IZA to then remove his mask to show Woody his face. IZA then proceeded to aim the
10 handgun at the direction of Woody and pulled the trigger as Woody watched in horror. Fortunately, the
11 handgun did not fire as IZA rushed out to leave the apartment.

12 13. The following items owned by Woody were stolen by IZA, collectively "Stolen Items":

- 13 • HP Spectre x360 (Model 15-bl112dx) laptop, black color, purchased on 02/23/2018 for
14 \$1,536.99 containing 2000 Bitcoin worth approximately \$80,000,000.00 in today's value;
- 15 • Lenovo laptop black/grey color containing 5000 Bitcoin worth approximately
16 \$200,000,000.00 in today's value;
- 17 • Hewlett Packard laptop black/grey color containing 20 Bitcoin worth approximately
18 \$800,000.00 in today's value;
- 19 • Blackberry smartphone containing 50 Bitcoin worth approximately \$2,000,000.00 in
20 today's value;
- 21 • Samsung Galaxy 9 Plus Edge dark blue or black smartphone containing 20 Bitcoin worth
22 approximately \$800,000.00 in today's value;
- 23 • Samsung Galaxy 9 Plus Edge dark blue or black smartphone containing various
24 cryptocurrency including Altcoins worth approximately \$500,000 in today's value;
- 25 • iPhone 7 Plus gold color smartphone, containing 10 Bitcoin worth approximately
26 \$400,000.00 in today's value.
- 27 • iPhone 6s gold color smartphone;
- 28 • Yellow Gold Rolex Submariner (Reference # 116618 LB) worth approximately \$50,000.

- Phillip Plein outfit consisting of shirt and matching pants worth approximately \$3,000.
- Wallet containing personal identification, credit cards, debit cards and cash in the approximate amount of \$3,000.

14. Woody, along with Taylor and Masters, were in a state of shock after the Robbery. Woody grabbed what few personal items he had and fled the scene in fear of his safety. A friend of Woody then rented an Airbnb apartment and Woody, along with Taylor and Masters hid out for a couple of days during which Defendant IZA and Defendant ZELOCCHI attempted to contact him repeatedly to ask for the password access to the devices they could not access. In the days to follow, Iza would send that picture to Woody handcuffed from the Robbery in an effort to intimidate Woody into providing password information to access to certain devices.

15. Defendant IZA and Defendant ZELOCCHI made no attempt to hide that they were behind the theft and assault. A few days after the Robbery Defendant IZA and Defendant ZELOCCHI were so emboldened and brazen enough to attempt to use Woody's stolen credit card from his wallet to purchase a luxury belt but left the store when the customer representative asked for identification.

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

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

18. Defendant Iris Au ("AU") is an individual who has been previously employed as a real estate agent. She is believed to be in her mid to late 30s. AU has no known financial expertise, training, or meaningful experience in marketing, finance, personal or corporate investments or cryptocurrency.

1 Despite this Au is the owner and operator of multiple legal entities, including, but not limited to VURG
2 and DREAM.

3 19. Dream Agency, Incorporated (“DREAM”) is a California corporation. In its California
4 Secretary of State Statement of Information, filed on March 29, 2022, DREAM’S corporate purpose is
5 described as a “marketing agency.” The Statement of Information identifies AU as the Chief Executive
6 Officer, Secretary, Chief Financial Officer, and sole Director and as DREAM’S agent for service of
7 process. Its corporate headquarters is listed as 1048 Irvine Ave. #373, Newport Beach, CA 92660. That
8 address is in a strip mall. Public records list the tenant for unit 373 as Tower Management, Inc., not
9 DREAM or AU. The California Secretary of State database shows no active corporation named Tower
10 Management.

11 20. The website for Vurg.com (“VURG”) describes itself as “a peer-to-peer marketplace
12 where users can buy, sell and store popular cryptocurrencies.” VURG’s website states that it is based in
13 Newport Beach, CA, however, there is no physical address provided anywhere. VURG’S website
14 clearly identifies AU as the “founder and CEO.” At most, VURG had less than 800 followers on the
15 Instagram application and conveniently defined its location as “The Moon.” The Secretary of State
16 database shows no business listing for VURG.

17 21. Defendant ZORT, Inc. (“ZORT”) is a Delaware Corporation which lists its primary place
18 of business as California. ZORT claims to be a software platform which allows subscribers to trade in
19 cryptocurrencies. IZA holds himself out as the “founder and CEO” of ZORT. AU is similarly a founder
20 of ZORT, she was initial owner of the name and website and was regularly involved in the day-to-day
21 management of the ZORT.

22 22. Defendant AU, conspired with and joined IZA and ZORT in a scheme designed to
23 defraud unsuspecting cryptocurrency investors by promising them services, profits, and security for their
24 funds without revealing to those victims that IZA and AU were converting investor funds to AU’S and
25 IZA’S personal use.

26 23. Those companies, exist only on paper and have no real physical offices, and include, but
27 are not limited to, ZORT, Vurg Inc., Dream Agency, Inc., Inspired Marketing, Inc., HQ Media Services,
28 LLC., T8C Brand LLC., ZORT (and likely other entities), all without active business operations,

1 employees, significant assets or demonstrable revenue. Almost all list either AU, IZA or Consuelo
2 Rabaya (AU's mother) as the owners of the entities.

3 24. In order to create useable monetary liquidity from the cryptocurrency funds initially
4 derived from the theft of those certain devices listed as Stolen Items, Defendants, either as individuals,
5 or under the veil of various shell companies have collectively engaged in unlawful acts or activities in
6 order to fund their extravagant lifestyle.

7 25. Initially, Defendants transferred cryptocurrency out of the existing bitcoincore,
8 elctrum and blockchain.com wallets from certain devices listed as Stolen Items. Defendants would
9 transfer to multiple other wallets small amounts at a time. This is a practice commonly known as
10 "smurfing" to evade detection and as a tax avoidance. At first, Milad Sarwari would route those funds
11 through a generic CHASE account out of Las Vegas, NV, however, the funds became too large and too
12 numerous and ultimately the ruse was discovered, and the account was closed by the bank.

13 26. Defendants then developed more sophisticated schemes to disguise the various
14 cryptocurrency financial assets so they can be used without detection of the illegal activity that produced
15 them and without exposure to tax liability. One example, was Defendants use of the following Etherscan
16 Account:

17 0x15f7DE0fB0880A0e3B4E9FE7428E5D6AF6bB8702

18 Utilizing this account, Defendants, have transacted over \$15M through this wallet using Binance,
19 Remitano and Coinbase platforms seen here:

20 <https://etherscan.io/address/0x952828fb7a6a2d3ada0ee318eeb0ac9b2735ca2d#tokentxns>

21 27. Defendants then shifted strategies in early 2021, leaving behind the use of "mules" to
22 launder the money like Milad Sarwari and proceeded to link that Etherscan wallet to transact with the
23 ZORT Coinbase account and Altonomy, mainly via trader Clarence Lim based in Singapore. Altonomy
24 is an over-the-counter ("OTC") broker who has emerged as the lynchpin of a new type of money
25 laundering, helping to turn at least \$2.8 billion worth of Bitcoin into cash for criminal entities in 2019
26 alone, according to a new report from crypto forensics firm Chainalysis. OTC brokers like Altonomy are
27 a familiar fixture in both the crypto and conventional stock trading worlds, and many of them are
28 legitimate. In the case of Bitcoin, they connect buyers and sellers who want to trade large amounts of the

1 currency without listing it on an exchange—often out of concern that making the trade public could
2 cause a price swing.

3 28. Defendants then created Zort cryptocurrency, a unique alternative cryptocurrency, to
4 more effectively trade large amounts without transparency or regulation. By listing Zort Coin on crypto
5 Exchange Kucoin.com, defendants were to essentially "wash" bitcoins. Defendants continue to use
6 ZORT to launder money using ZORT's subscription system comprised of false accounts not belonging
7 to genuine users to facilitate transactions and using ZORT as the front to effectively “launder” money
8 through Altonomy.

9 29. AU, IZA and ZORT have been sued in U.S. District Court for Central District of
10 California (Khan v. Zort, Inc. et.al. 2:21-cv-08681) on allegations that the defendants in that case
11 violated state and federal securities fraud laws as part of a cryptocurrency scheme to defraud numerous
12 individuals of hundreds of millions of dollars from starting in February 2020. The Kahn complaint
13 alleges that:

14
15 “In September 2021, Plaintiff’s [Mr. Kahn’s] suspicions came to a head when
16 Plaintiff discovered that the individual who created Zort’s trading algorithm was no
17 longer employed by Zort. When Plaintiff discovered this information, he demanded
18 that Defendants return his entire investment, along with any profits. Plaintiff’s
19 demand was denied by Defendant and Mr. Khan was informed that Defendant would
20 not return his investment, stating “are you fucking crazy?”

21 30. IZA, ZORT and AU have been sued in the Superior Court, County of Los Angeles
22 (Paramount v. Au et.al. Civil 17 Unlimited 22STCV15330). That complaint contains allegations which
23 Woody believes to be supported by evidence and therefore believes to be true that provides further
24 evidence that AU and IZA were conspiring to retrieve Woody’s HP Spectre x360 laptop listed as a
25 Stolen Item and kept by ZELOCCHHI after the Robbery. Of note, is that the Paramount complaint
26 alleges that:

27 “On or November 15, 2021, IZA contacted CHILDS to enlist the service of
28 PARAMOUNT. PARAMOUNT is duly licensed by the California Secretary of
State, Bureau of Investigative Services. PARAMOUNT’S primary business is
providing investigative and security services. Kenneth Childs (“CHILDS”) is
PARAMOUNT’S Qualified Manager and CEO, duly licensed by the California

1 Secretary of State, Bureau of Investigative Services. IZA told CHILDS that an
2 individual IZA identified as Enzo Zelocchi had stolen a laptop computer belonging
3 to IZA and ZORT which IZA claimed contained data necessary for IZA to access
4 Bitcoin funds belonging to IZA and ZORT which IZA valued at \$1,000,000,000 (one
5 billion dollars USD).

6 “IZA told CHILDS that he wanted PARAMOUNT to locate ZELOCCHI for the
7 purpose of aiding IZA to assist law enforcement in arresting ZELOCCHI and
8 retrieving the stolen laptop. IZA told CHILDS that time was of the essence and that
9 he wanted PARAMOUNT to conduct a multiple-investigator 24/7 surveillance of
10 ZELOCCHI and to identify and follow anyone associated with ZELOCCHI. On or
11 about, February 22, 2022, PARAMOUNT received a wire transfer of \$59,900.00.
12 Unknown to CHILDS at the time, the wire transfers were made by and through
13 DREAM. The CA Statement of Information identifies AU as the Chief Executive
14 Officer, Secretary, Chief Financial Officer, and sole Director of DREAM.”

15 31. Collectively, IZA and AU, neither of who have achieved higher education beyond High
16 School, nor who would be unable to demonstrate lawfully generated income, would be hard pressed to
17 show transparency as to how they fund a lifestyle that grossly supersedes the usual bounds and exceeds
18 the limits of reason or necessity.

19 32. Before the Robbery, IZA was unable to afford a permanent residence and temporarily
20 living with ZELOCCHI. Soon after the Robbery, recently IZA, AU along with Ms. Rabaya, moved into
21 an estate in the Holmby Hills / Bel Air area for most of the time since the Robbery, living comfortably
22 in a home that one Internet real estate listing service estimates the value at \$28 million. More recently
23 IZA, AU along with Ms. Rabaya, moved to the similarly exclusive Newport Coast area to a more
24 modest home valued at around \$9 million. The monthly rent for these homes likely exceeds \$40,000.
25 Currently, the six (6) cars that are parked at the home in the Newport Coast area are two Lamborghinis,
26 a Ferrari, a Rolls Royce, a Cadillac Escalade and a Vanderhall Motor's Edison².

27 33. Since the Robbery, IZA lives with Defendant AU and Defendant AU's mother, Consuelo
28 Rabaya. Neither IZA, AU nor Ms. Rabaya seemingly have the verifiable income or previously obtained
wealth to proportionally reflect their living situation and are undoubtedly living a lifestyle that is beyond
their means since the Robbery on September 2, 2018.

1 **FIRST CAUSE OF ACTION**

2 **FOR CIVIL CONSPIRACY**

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

4 34. Plaintiff incorporates herein by this reference as though set forth in full paragraphs 1-25
5 of the Complaint as though fully set forth herein.

6 35. Defendant IZA and Defendant ZELOCCHI formed and enacted a conspiracy to deprive
7 Plaintiff Woody of his cryptocurrency.

8 36. Defendant IZA and Defendant ZELOCCHI had a meeting of the minds on the object to
9 be achieved and the course of action for accomplishing the resulting theft of the devices and the
10 cryptocurrency contained on those devices.

11 37. Stealing the devices containing the cryptocurrency was an overt act unlawful act in
12 furtherance of that conspiracy.

13 38. Defendant ZELOCCHI was aware that Defendant IZA planned to commit the assault,
14 false imprisonment, and theft against Woody.

15 39. Defendant ZELOCCHI agreed with Defendant IZA's intention that assault, false
16 imprisonment, and theft be committed against Woody.

17 40. Plaintiff Woody incurred damages as a proximate result of Defendants' conspiracy to
18 steal Plaintiff's cryptocurrency.

19
20 **SECOND CAUSE OF ACTION**

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

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

23 41. Plaintiff incorporates herein by this reference as though set forth in full paragraphs 1-32
24 of the Complaint as though fully set forth herein.

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

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

3 44. Defendant IZA substantially interfered with Woody's property by knowingly or
4 intentionally taking possession of the devices and refusing to return them to Plaintiff after Plaintiff
5 Woody demanded their return from Defendants.

6 45. Woody did not consent to IZA's taking.

7 46. Woody was severely harmed by the loss of his property and its contents.

8 47. ZELOCCHI and IZA's conduct was a substantial factor in causing Woody's harm.

9 48. Woody now seeks the return of his property, including the contents present at the time his
10 property was taken from him.

11
12 **THIRD CAUSE OF ACTION**

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

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

15 **(Against All Defendants)**

16 49. Plaintiffs incorporate herein by this reference as though set forth in full paragraphs 1-40
17 of the Complaint as though fully set forth herein.

18 50. As described above, Defendant IZA feloniously took Woody's personal property,
19 including the bitcoins contained therein. IZA took Woody's personal property from Woody's person or
20 immediate presence, against his will, and accomplished this by means of force or fear – by threatening
21 Woody with a 9MM semi-automatic handgun.

22 51. Defendant IZA did this in coordination (in conspiracy) with defendant ZELOCCHI.
23 Furthermore, it is our belief that Defendant IZA retained possession of all devices and possession except
24 for the Rolex watch, Blackberry smartphone and the HP Spectre x360 laptop which are in the possession
25 of Defendant ZELOCCHI.

26 52. Thereafter, Defendant IZA and Defendant ZELOCCHI obtained the Bitcoins from the
27 personal property of Woody. Those Bitcoins rightfully belonged to Woody.
28

1 53. After wrongfully obtaining Woody’s Bitcoins, Defendant IZA and Defendant
2 ZELOCCHI brought further individuals into their racketeering enterprise. One such individual was
3 Defendant AU, Defendant AU’s mother, Consuelo Rabaya and Milad Sarwari who helped IZA and
4 ZELOCCHI take Woody’s Bitcoins, and through elaborate transactions, Defendants were able exchange
5 them for U.S. Dollars.

6 54. The Lenovo laptop had Bitcoin Core and Electrum; the Hewlett Packard laptop as well as
7 the two Samsung S9 smartphones and iPhone 7 Plus smartphones had blockchain.com. The Blackberry
8 had blockchain. These devices were listed as Stolen Items and in total, the cryptocurrency worth
9 approximately \$284,500,000.00 in today’s value.

10 55. Defendants would transfer smaller amounts in multiple transfers over time to other
11 cryptocurrency wallets, including transfers to accounts in the name of Defendant ZELOCCHI,
12 Defendant AU, and Milad Sarwari, as well as affiliated shell companies owned and managed by
13 Defendants. From these wallets, Defendants would transfer funds into an Altonomy securities trading
14 platform, including brokerage accounts handled by trader Clarence Lim based in Singapore, who would
15 subsequently then issue bank wire transfers into offshore bank accounts. Some of these OTC trades were
16 at times completed by utilizing Telegram software as user “@zorttrader” which belonged to the
17 Defendants.

18 56. Defendants further created a cryptocurrency called Zort and Defendants and their
19 conspirators have actively participated in currency manipulation of Zort cryptocurrency in order to
20 artificially inflate or lower the value of the Zort cryptocurrency to enable the transfer of Woody’s
21 Bitcoins into U.S. Dollars to fund their extravagant lifestyle.

22 57. 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. similarly utilized Altonomy to trade large amounts of
25 the currency without listing it on an exchange. Defendants, as well as related subsidiaries and the
26 respective offshore bank accounts were used by Defendants to funnel and transfer funds into domestic
27 accounts, and to hold property, in the name of Defendants, as well as shell companies owned and
28

1 managed by Defendants. Defendants would purchase assets, including vehicles, luxury clothing, apparel
2 accessories and jewelry.

3
4 **WHEREFORE**, Plaintiff prays for judgment against Defendants as follows:

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

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

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

11 4. For costs of suit incurred herein.

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

13 **For RICO Cause of Action:**

14 1. For Actual Damages

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

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

17 4. For Costs of Suit

18
19
20 DATED: February 24, 2022, and as Amended on July 31, 2022

21
22 By: _____
23 RONNIE MIRANDA
24 Attorney for Plaintiff