

United States District Court
Eastern District of New York

ORIGINAL

Mir Islam)

v.)

Godaddy.com Inc.)

Troy Woody JR)

Civil Case: **CV18-1876**

MAUSKOPE, J.

BLOOM, M.J.

Diversity/CFAA/ACPA/SCA Suit

Plaintiff, Islam Mir brings this Diversity suit against Defendants Troy Woody JR and Godaddy.com Inc. Pursuant to CFAA, The Lanham Act (15 U.S.C. 1114), ACPA (Cyber-Squatting), SCA and other New York state torts.

Jurisdiction

The Honorable Court has Jurisdiction under 28 U.S.C. 1331 as three Federal matters are involved. (CFAA, ACPA & SCA). Also the Honorable Court also has Jurisdiction over citizenship diversity. as the Plaintiff is a New York Citizen, Troy Woody JR is a Virginia Citizen & Godaddy.com Inc. is a Arizona Citizen. The damages for the suit exceeds the \$75,000 requirement.

Process of Service

As the Plaintiff is proceeding as Indigent Prisoner, the plaintiff requests this Honorable Court to allow issuance and Process of service by Court officers. 28 U.S.C. 1915(L); Fed. R. Civ. P. 4(1) (2) (B)(1)

FILED

IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ MAR 19 2018 ★

BROOKLYN OFFICE

2

Process of Service

The defendant Troy Woody JR has a Virginia ID & lives here but also uses New York Addresses.

One of the domains he has hacked the whois provides this Address: 1000 Forbes St
Fredericksburg, VA 22405 (From whois of SexClients.com)
Support@hated.net
5402277711

The ~~whois addresses~~ ^{Whois addresses} he uses for his two domains Hated.net/
Hated.co are:

57 st
New York, NY 10022
6468369544

57 E 57st
New York, NY 10022

Domain-Manager@hated.net

The defendant's BOB.org business address is:

Godaddy.com Inc.
14455 north Hayden Rd Suite 219
Scottsdale, AZ 85260

~~Troy Woody JR~~

-Plaintiff's Background

Plaintiff is currently incarcerated at MDC Brooklyn. Plaintiff Supervised Release was revoked on Jan 17, 2017 and since then has been incarcerated. The Plaintiff is a Technological Expert and is set to be released on May 18, 2018.

③

Complaint

The defendant ("TJ") is 21 years old & Plaintiff's best friend, they have known each other over 8 years. The Plaintiff & the defendant for a very long time ~~as~~ worked on many projects together, few successful but many failures. The Plaintiff ("Josh") thought of an idea to provide an online marketplace where we would invest into the sellers, thus the Plaintiff (Josh) had his little brother register the domain "VerifiedChoice.com" on his behalf. Josh told TJ about the idea, which ~~he~~ thought would be a great idea, which Josh offered TJ a deal. Josh said he would borrow enough money so we can get the ~~Project~~ ^{Project} started if TJ is willing to put his full time on the project. TJ told Josh, he would agree only if Josh agreed that if our project becomes successful ~~and~~ ^{and} we register a startup company to sell to a venture capital, he would get 45% (which Josh (the Plaintiff) agreed.) We agreed that my duties would be to raise funds, manage the domains for this project & any other projects we were working on, the servers, databases, promote the websites, help ~~map~~ package & ship of the products. TJ agreed to do everything else, take care of the finance management and conduct offline sales. TJ would sell products on Apps like 5miles and Offerup which allows people to meet up and trade things for cash like Craigslist. The defendant & Josh agreed that all the cash that came out of these sales, we would keep as a emergency ~~Reserve~~ Reserve fund.

We had the project set up like this, the soon to be sellers would choose products from websites [wholesale distributors] [Alibaba,

④

DHgate, wish.com and/or other sites], once the products were chosen, TJ would research to make sure they are popular & profitable then he would order it. The products would be kept in storage, once the sellers received ~~orders~~ ^{orders}, they would update it on the Seller Panel on verifiedchoice.com then TJ would bring the items the next day which we would package & ship.

The sellers would sell the products on verifiedchoice.com,groupon.com, Amazon.com, Ebay.com, half.com, Mercari.com and any other marketplace they choose. All the sales deposits that the sellers received from the marketplaces would be sent back to us minus 35% of the profits. All order details and customer details would be added through the seller panel, we used to communicate with the sellers from @verifiedchoice.com emails, which is private email servers ~~was~~ ^{was} setup.

TJ & Josh collected Bitcoins as one of their projects, we believed the value of the Bitcoins would increase. As of Jan 1st, 2017 we had over 52 bitcoins on different bitcoin clients on verifiedchoice.com's server and other online clients. We always agreed that we would split 50% down the middle for all the bitcoins we collect.

I ~~had~~ had a debt of \$21,500 ~~and~~ ~~owed~~ owed to the banks for our projects & \$25,000 to my mother. (TJ knew about both of the debts, which we were going to pay off our profits)

⑤

Troy Woody JR

Pursuant to Lanham Act, (FAA, ACPA, SCA, Trespass to Chattels, New York Common Law Trademark Infringement, unfair competition, Conversion, Tortious Interference with Business Relations, unjust enrichment, Breach of the Covenant of Good Faith and fair dealing the engagement agreement, breach of Contract, breach of Fiduciary Duty, use of name with intent to deceive in violation of General Business Law Article 9-B § 133, Breach of loyalty:

The defendant ("TJ") took complete & unauthorized control over Verified Choice, Com's Server. He took complete unauthorized control of all the Data (customer information, seller info, accounting info, orders etc.) & all backups of the data bases were in the server & inside @verifiedchoice.com emails. He took complete & unauthorized control over both mail servers @verifiedchoice.com & @infest.org. TJ took complete unauthorized control over all the bitcoin clients/accounts. TJ hacked/hijacked Josh's Internet.hs account & took unauthorized control over the domain verifiedchoice.com (The Plaintiff's brother over a year later was finally able to regain control of the domain) TJ hacked the Plaintiff's Godaddy account & transferred (Infest.org, sexclients.com, blondesgonewild.com, dirtiest.net, makeinterest.com, malecologne.com, airbaggage.com, weeted.com, callerdetail.com, 12v2.com and ordersmartphones.com) these domains out of his account. All these hacks occurred on or about Jan/Feb 2017. Many of the sellers had deposits to give us for Jan 2nd - Jan 17th, which TJ took & had complete control over.

⑥

Trespass to Chattels, Conversion [Troy Woody]

As of Jan 1st, 2017 we had \$150,000 of products [retail value] [Products Chosen by sellers] [This was what the defendant had informed the Plaintiff, which Josh confirmed on the Seller Panel on VerifiedChoice.com the same day.] TJ took all the products from storage & Josh's room which only 45% minus the debt belonged to him. TJ took control of 12 domains and all of the Bitcoins (52 BTC).

Fraud [Troy Woody]

The Plaintiff turned himself into the Marshalls on Jan 17, 2017 for violations of Supervised Release. The Plaintiff was being held in GEO Queens (QDF) in Queens, New York. While Josh was incarcerated in GEO, he had communicated to TJ through the prison phone. TJ advised the Plaintiff that since the Plaintiff was incarcerated he should let his little brother continue with the project behalf of Josh so the project can grow big enough to open up a startup company & sell it to venture capitalists. The Plaintiff informed his brother about the agreement thus his brother started looking for warehouse to rent so they can use it as storage & packaging ship from there. TJ told Josh that he was gathering all the products and everything else so he can take ^{them} to Florida. TJ said this so Josh's guard would be down as Josh was yet to find out that it was TJ ~~was~~ who tipped off the Probation Department about Josh's violations. That is when TJ took unauthorized control over every single thing except for the \$21,500 debt owed to the bank & the \$25,000 owed to Josh's mother. Plaintiff's little brother worked a whole year & paid

④

off \$10,000 from the \$21,500 debt to help the Plaintiff, while Josh is incarcerated.

Intentional Infliction of emotional Distress (IIED)

The Plaintiff on Jan 13, 2017 had asked his girl friend to marry him, which she said yes. The Plaintiff informed TJ of this, he seemed happy for Josh. What Josh did not know was that the defendant then went to Josh's gf and told her that Josh had hired a "hitman" to kill her family, if she had refused to marry him. She has executive functional disorder, which TJ used to manipulate into ^{actually} believing him. Then he convinced her only way to stop it would be to tell his Probation officer about Josh's violations. TJ emailed the PO, which in the email he provided the begin details to a @interst.org email that TJ lacked. TJ convinced Josh's gf to speak to the PO & confirm everything TJ had written on the email, which she did. Because of the acts taken by TJ, Josh has received a total of 33 month sentence. Josh has gone through so much mental anguish, Josh lost the love of his life (who was going to be his wife, whom he had discussions about having children in the future.) Plaintiff's Parents has lost all faith in him & his life has been completely ripped open & put on fire.

Craddaddy.Com Inc.

Contributory Trademark Infringement in violation of the Lanham Act, Contributory Cybersquatting, Gross/Reckless negligence, negligence, breach of contract, Contributory

⑧

Godaddy.Com Inc.

unfair Competition, Contributory Trespass to Chattels, Contributory New York Common Law Trademark Infringement, breach of Fiduciary duty, breach of the ~~Covenant~~ Covenant of good faith and fair dealing in the engagement Agreement & Contributory Conversion.

Troy Woody had Hacked/Hijacked the Plaintiff's domains. The Plaintiff contacted Godaddy informing them that his domains has been hacked out of his account. Godaddy responded by saying that the domains were only transferred out of his account & that he ~~was~~ should contact another department so they can reverse the transfer. (The Plaintiff sent a email to the email they provided) The other department responded saying that now the domains were transferred out of Godaddy & they can't help me.

Godaddy was notified of the hack [Trademark Infringement] that the domains were transferred out of the Plaintiff's account & unauthorized. Godaddy did absolutely nothing, they did not even lock the domain so they could not be transferred out of the Registrar. They actually allowed Troy Woody to transfer the domains from Godaddy to another Registrar. They knew that Troy Woody or whichever false name he had on his account was infringing by hacking the domain, Godaddy had direct control and monitoring of the domains then Godaddy agreed to transfer the domains to another registrar even with the knowledge that ~~they~~ ^{the domains} had been hacked,

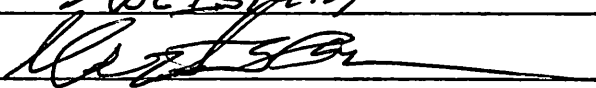
9

Relief

The Plaintiff prays to this Honorable Court to award Compensatory, Punitive actual damages, Statutory, emotional and any other relief/award the Plaintiff might be entitled to. As the Plaintiff is unsure as to what he is entitled to as awards, for the sake of the requirements of the suit, the Plaintiff requests \$10,000,000 for compensatory, punitive actual ~~damages~~ and emotional damages from each of the two defendants.

Plaintiff also requests Statutory damages under 15 U.S.C 1117(d) against both defendants. For the 12 domains hacked by Troy woody JR, Plaintiff requests \$100,000 per domain thus totaling \$1,200,000. For the 11 domains that Go Daddy is liable for Contributory Cybersquatting, the Plaintiff requests \$100,000 per domain thus totaling ~~\$100~~ \$1,100,000 from GoDaddy.com Inc.

I Declare all statements in this suit is true to the best of my knowledge and ^{standing} ~~under~~ ^{under} the ~~penalty~~ ^{penalty} of perjury ~~under~~ ^{under} the Law.

Respectfully Submitted,
"Mir Islam"


Please send any replies or any Court Documents that is filed to these two addresses:	Mir Islam
Mir Islam 6710054 Metropolitan Detention Detention Center Brooklyn 80 29th St Brooklyn, NY 11232	2046 bronxdale ave APT 4B Bronx, NY 10462

IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ MAR 19 2018 ★
BROOKLYN OFFICE

FILED
CLERK

Mir Islam

3/18/18

[Signature]

2018 MAR 19 PM 3:23

Damages Affidavit

①

- (1) Products - \$150,000 retail value
- (2) Debt owed to banks - \$21,500 / \$25,000 owed to Josh's Mom
- (3) Physical Cash - \$35,000
- (4) 52 Bitcoins
- (5) verifiedchoice.com server/mail server
- (6) verifiedchoice.com Database (including all customer data, seller data, orders data, accounting details, etc.)
- (7) Infest.org Mail Server
- (8) Verifiedchoice.com (recovered Mar 1st, 2018 ^{one} year after),
Infest.org, sexclients.com, blondesgonewild.com, dirtiest.net, makein-
terest.com, malecatalogue.com, airbaggage.com, weeted.com, calleddetail-
.com, 1242.com & ordersmartphones.com
- (9) Deposits sellers had still owed us after the date Jan 1st, 2017
/ Products taken from Plaintiff's Room (unknown value)

\$150,000	\$101,750	Bitcoin - 50% belongs to Plaintiff (52 btc)
35,000	+ 21,500	
$185,000 \times 55\% =$	\$123,250	2) 26 Btc

The Plaintiff owns 55% of all the Products and cash taken which value + the debt owed to the banks is \$123,250. The defendant & the Plaintiff together had 52 BTC, 50% belonged to the Plaintiff, thus 26 BTC. All the domains are owned fully by the Plaintiff. All data & servers were hacked over a year ago and all the backups were on the server he was hacked thus Plaintiff lost all the data thus ~~Tony Woody~~ violated SCA. The Plaintiff/Defendant owes the Plaintiff's mother which was to be paid from the profits.

②

Damages Affidavit

All items, assets, Cash, domains, Bit coins, mail Servers
Servers ~~sever~~ and databases were stolen, hacked, hijacked or
taken full control of without Authorizations.

The value of the Product (\$150,000) was told to the Plaintiff
on Jan 1, 2017 and was confirmed on the Sales Panel on
VerifiedChoice.com. The Plaintiff does not know, if
product value was up or down between Jan 2 - Jan 17
as he became incarcerated and never again saw
had access to the products nor the sales panel or
databases ever again. Plaintiff was informed that
Troy woody had told his brother it was about \$150,000
retail valued products in storage after Plaintiff was
incarcerated. Under good faith I request the Honorable
Court to accept the value as of Jan 1, 2017 ~~as of~~^{as}
Plaintiff cannot under perjury of the Law state the value
as of Jan 17, 2017. The same as to the Cash that the
defendant had in the emergency fund and same as to the
amount of bitcoins that we had.

As Troy woody took control over all Financial Accounting
information which was in the databases on verified choice
com's server and in the sales panel. The Plaintiff requ-
ests your Honor to base the damages occurred from
this affidavit. Penalty of under

I, Islam Mir under the perjury of the Law declare
all statements made off this Affidavit on damages to be accurate
to the best of my knowledge & understanding. Islam 3/8/18