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9  
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES  
12 CENTRAL DISTRICT

13 MICHAEL TERPIN,  
14 Plaintiff,  
15  
16 v.  
17 NICHOLAS TRUGLIA,  
18 Defendant.

Case No. 18STCV09875

Honorable Barbara M. Scheper  
Dept. 30

**DECLARATION OF CHRIS DAVID IN  
SUPPORT OF PLAINTIFFS' EX PARTE  
MOTIONS FOR TEMPORARY  
RESTRAINING ORDER, WRIT OF  
ATTACHMENT, TEMPORARY  
PROTECTIVE ORDER AND EXPEDITED  
DISCOVERY**

**Date:** December 31, 2018

**Dept:**

**Time:** 8:30 a.m.

19  
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24 I, CHRIS DAVID, hereby declare and state as follows:

25 1. I am a 25-year-old resident of New York City. I make this Declaration  
26 in support of Plaintiff Michael Terpin's motion for a temporary restraining order, writ of  
27 attachment, and other relief in the above-entitled action. If called to testify, I could and would  
28

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ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

DEC 31 2018

Sherri R. Carter, Executive Officer/Clerk  
By N. DiGiambattista, Deputy

1 testify as follows:

2 2. I am self-employed as a private jet broker.

3 3. Around the spring of 2018, I met the defendant Nicholas "Nick"  
4 Truglia at a fitness center in Manhattan attached to his luxury apartment building. We casually  
5 conversed about his interest in booking private jets with his cryptocurrency. After the next time  
6 that we met at the gym, I went to his apartment, and we discussed opportunities for him to use  
7 private jets to fly to Miami over the Fourth of July weekend.

8 4. A few days later, I quoted Nick a price of \$38,000 for the private jet he wanted to  
9 hire. He said that he could pay that amount out of his cryptos, and he showed me his accounts on  
10 his computer and mobile phone, totaling tens of millions of dollars. In particular, I saw he had  
11 over \$7 million of cash in his JP Morgan Chase mobile application, and he had over \$12 million  
12 of various cryptos in his Gemini account on his computer. At the same time, Nick showed me  
13 two thumb drives (Trezors). One had over \$40 million cash value of various cryptos, and the  
14 other one had over \$20 million cash value of various cryptos. Nick told me that he had at least  
15 two other Trezors, but he did not show them to me. Ultimately, Nick did not lease the jet that I  
16 offered.

17 5. Attached as Exhibit A is a photograph of Nick's living room that I took  
18 around June of this year. You can see one of the Trezors on the coffee table. You can also see a  
19 bundle of cash in the upper left portion of the credenza. Nick told me that the bundle was over  
20 \$100,000 in cash.

21 6. I asked Nick where he got all this money and crypto coins. He told me that he  
22 earned them from "mining." As I understand it, cryptocurrency mining is a process whereby a  
23 "miner" provides support for a given cryptocurrency by verifying information and adding the  
24 transaction to the blockchain and in return the successful miner receives small amounts of the  
25 given cryptocurrency.

26 7. I found this explanation implausible because Nick was too young (age  
27 20) to accumulate that amount of wealth as a miner—he would have had to start when he was  
28 about ten years old. Nick also did not strike me as a computer nerd who lives and breathes

1 camping on the Internet. As discussed below, my hunch was right—Nick subsequently admitted  
2 to me that he stole all his money from hacking cryptocurrency accounts.

3 8. Over the next few months, Nick and I socialized at nightclubs, local bars, the gym,  
4 and in his apartment playing video games. Gradually, I got to know Nick. He does not have a  
5 job or visible means of support. His typical day is to get up late, go to the gym, eat at the deli  
6 across the street, play video games late into the night and he had no friends. Nick is an egotistical  
7 braggart about his life and wealth. For example, once at a crowded lounge, he said: “Chris, I  
8 have more money than all of the people here tonight.”

9 9. Nick was conspicuous with his wealth. He lived in a \$6,000 per month apartment,  
10 wore a Rolex watch which he told me cost \$100,000, and told me that he was going to purchase a  
11 McLaren sports car (costing over \$250,000) and planned to purchase outright a used private jet  
12 (costing several million dollars) and a Manhattan condominium (costing several million dollars).

13 10. While I am not a mental health professional, Nick betrays symptoms of  
14 sociopathy. When he had over \$70 million, he hacked his own father and stole \$15,000. I have  
15 seen him beat his small dog, hitting him with his hand and a broom handle, and taking gleeful  
16 delight in cheating people (like walking out an expensive restaurant check) and their misfortune  
17 (a poor person losing his job).

18 11. I personally witnessed Nick Truglia attempting to what I later learned was “SIM  
19 swap” at an AT&T store in Times Square in New York on Sunday, August 19, 2018.

20 (a) Before arriving at the store, Nick had managed to get his name added to an  
21 account belonging to someone else. At the store, Nick first persuaded an AT&T employee named  
22 Spencer to give him access to this account because Nick had the telephone number and pin  
23 number for the other person’s account. But Nick did not have personal identification for the true  
24 owner of the account. Instead, he had his own passport, which satisfied the employee. Nick’s  
25 attempt to execute the SIM swap, however, was stymied because the bill had not been paid. Nick  
26 chose not to pay the balance due. Otherwise, he would have succeeded.

27 (b) Attached as Exhibit B is a photograph of Nick at the AT&T store on August 19,  
28 2018.



1 (c) Attached as Exhibit C is a screen shot of a video showing Nick's passport being  
2 used at the AT&T store on August 19, 2018.

3 12. Later near the end of August of 2018, I took a screen shot of Nick's public Twitter  
4 account (@erupts) on Twitter.com. Attached as Exhibit D is that screen shot, which shows Nick  
5 admitting six times that he "Stole 24 million." These statements were similar to the statements  
6 Nick made to me on September 9<sup>th</sup>, when he admitted that he hacked Michael Terpin who lost  
7 \$24 million of cryptos.

8 13. These actions made me extremely alarmed and I already had qualms about doing  
9 business with Nick. I approached him about his actions and recorded an in person conversation at  
10 the end of August 2018. I did not want to be grouped in or affiliated with his crimes so I believed  
11 it was best to have this on audio. At the time, he was discussing "SIM swaps" and hacking in  
12 order to steal crypto currencies ("cryptos") like Bitcoin. I was intrigued and horrified because I  
13 did not know anything about this type of crime. In this conversation, he told me:

14 (a) How **Redacted** and he hacked Terpin to steal his \$24 million worth of cryptos.

15 (b) How **Redacted** and he laundered cryptos out of the blockchain into cash.

16 (c) That he has an account at the Gemini exchange and he took out \$1,200,000 from  
17 that account after hacking Terpin.

18 (d) That he committed tax fraud.

19 (e) That he saw records indicating that in December 2017, **Redacted** had \$70 million.

20 (f) That Michael Terpin is too dumb to be able to figure out what happened and trace  
21 the laundered cryptos.

22 14. On the evening of September 6<sup>th</sup> of this year, Nick texted me that he wanted to go  
23 out. We went to a sports bar and then a nightclub. Around 3 a.m., we all went back to Nick's  
24 apartment to put him to bed because he was so intoxicated. Then Nick started acting crazy,  
25 lighting a candle and throwing it at people. I was dozing and when I awoke a few minutes later, I  
26 saw Nick confronting one of the guests and shouting that everyone should leave. As I left, Nick  
27 handed me his computer and suggested I take it. At the time, Nick had allegedly hacked this  
28 person's phone by means of a "SIM swap" and that was the stated reason for their quarrel.

1           15.     The next morning, I took Nick’s computer back to his apartment. When I arrived,  
2 there were about eight police officers who examined me about what had happened the night  
3 before. After the police left, I purchased Nick some food because he claimed to have lost his  
4 wallet the night before and was very hungry. We then played video games for a few hours until I  
5 went home.

6           16.     Over that weekend, I heard reports that Nick was alleging that three other people  
7 and I had assaulted him that night in his apartment in order to steal cryptos off of his computer.  
8 Alarmed by this false accusation, I went to his apartment on September 9<sup>th</sup>. I recorded our  
9 conversation for about 53 minutes with the hope of Nick admitting that I did nothing wrong. In  
10 that conversation, among other things:

11           (a)     Nick highlighted that his allegations of being assaulted on the night of September  
12 6<sup>th</sup> were entirely false.

13           (b)     Nick highlighted that his only issue was with another person (and not me), and I  
14 had nothing to do with the alleged assault on the night of September 6<sup>th</sup>.

15           (c)     Nick told me that he told the police that he had \$60 million.

16           (d)     Nick admitted that had stolen all his money and had not legitimately accumulated  
17 his wealth.

18           (e)     Nick told me that he was a computer hacker and stole his victims’ cryptos. He  
19 said that this was thrilling for him—“the thrill of the game” which he would never stop doing—  
20 even if there was no money involved. It was all “a mind game.”

21           (f)     Nick related that his partner was a 16-year-old named **Redacted** . (Nick was 20  
22 at the time.) **Redacted** had stolen between \$70 and \$80 million through hacking.

23           (g)     Nick likened himself to Robin Hood who robs from the rich but did not give to the  
24 poor.

25           (h)     Nick explained in detail how he does hacking and SIM swapping.

26           (i)     Nick admitted that his “biggest” SIM swap was Plaintiff Michael Terpin for \$24  
27 million and **Redacted** was his partner.

28           (j)     Nick recounted that **Redacted** got some of the \$24 million.



1           17.     In another conversation on earlier in the day on September 9, 2018, Nick related  
2 the following to a mutual friend who recorded the conversation, which I heard and is the basis of  
3 the information below:

4           (a)     Nick arrogantly proclaims that he will never caught hacking/stealing because he is  
5 so good at it—literally, “how are they going to prove that my story [his defense] wrong?”

6           (b)     Nick also boasted: “Nobody can get me in trouble. Nobody can put me in jail. I  
7 would bet my life on it, actually.”

8           (c)     That as of September 2018, Nick has had \$60 million of Bitcoin.

9           18.     The next day, September 10<sup>th</sup>, 2018. Nick lured me to his apartment to borrow \$50  
10 because he supposedly had lost his wallet. Shortly after I arrived and gave him the money, the  
11 police came and arrested me for allegedly stealing Nick’s laptop on September 6<sup>th</sup>. I was shocked  
12 and confused since Nick had asked me to take his computer, and I returned it the next morning  
13 and we had hung out together two days in a row. This charge was bogus. I spent the night in jail.  
14 Eventually, Nick recanted, and the false charges were dropped.

15           19.     As mentioned earlier, Nick hacked his father for \$15,000. Nick’s father asked to  
16 be repaid in Bitcoin and gave Nick two Bitcoin addresses. Attached as Exhibit E is a screenshot  
17 from Nick’s phone (which he allowed me to use) confirming this exchange between Nick and his  
18 father (Vincent).

19           20.     In the summer of this year, I saw a fake New York State driver’s license which had  
20 the name and identifying information of a deceased man named Quentin Capobianco, but it had  
21 Nick’s photograph. A photograph of the fake driver’s license is attached as Exhibit E. I saw this  
22 photo because Nick had given me his phone.

23           21.     One time in the summer of this year when Nick showed me his account at TD  
24 Ameritrade. Attached as Exhibit F is a photograph of the first page of that TD Ameritrade  
25 account that I took.

26           22.     Based on the foregoing and what Nick told and showed me, I believe that Nick  
27 Truglia and **Redacted** have or had assets on deposit and held at, and/or processed/transferred  
28 through, JP Morgan, Gemini, TD Ameritrade, Coinbase, CashApp, Toronto-Dominion Bank, and

1 XAPO. In addition, I believe that assets belonging to Michael Terpin may be (or were) held by  
2 Vincent Truglia, Sr. (Nick's father) and **Redacted**

3 I declare under penalty of perjury of the laws of the State of California and of the United  
4 States of America that the foregoing is true and correct.

5 Executed in San Juan, Puerto Rico on December 30, 2018.



7 CHRIS DAVID

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# EXHIBIT A

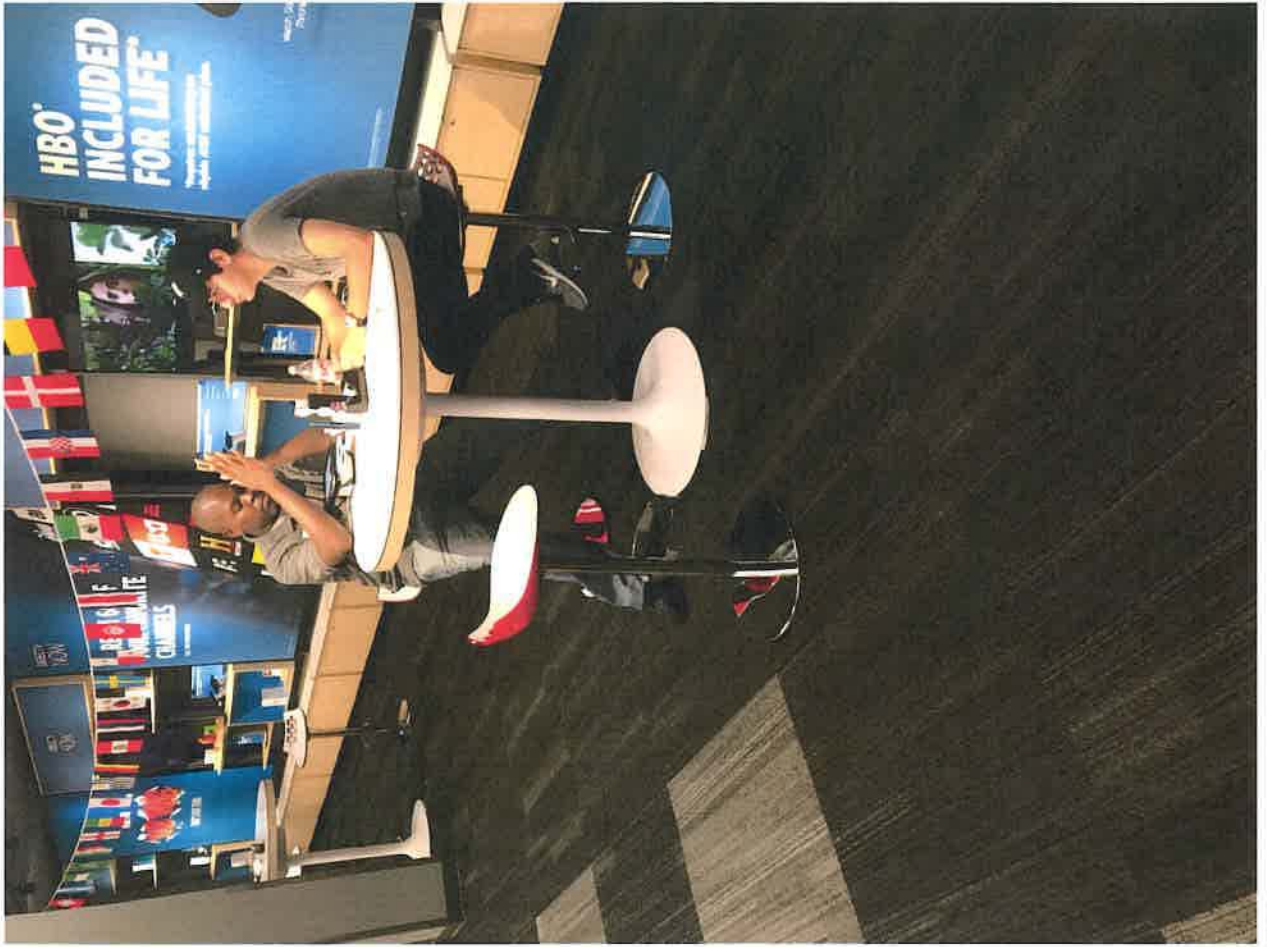




Nick Apartment.jpg



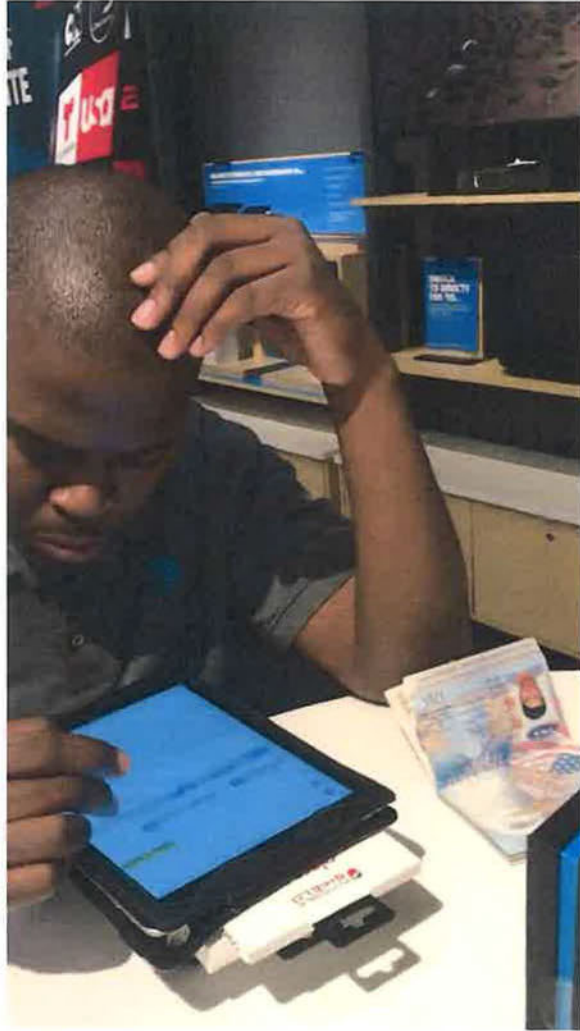
# EXHIBIT B





# EXHIBIT C

AT&T Store Augu...MOV



# EXHIBIT D



6:07 ↵



**Nick**

42K Tweets



**Tweets**

Tweets & replies

Media

Likes



**Nick** @erupts · 4h

Stole 24 million still a failure in the eyes of the world



**Nick** @erupts · 4h

Stole 24 million still can't stop stealing





**Nick @erupts** · 4h  
Stole 24 million but still can't keep a friend



**Nick @erupts** · 4h  
Stole 24 million can't stay away form drugs



**Nick @erupts** · 4h  
Stole 24 million dollars still can't hold a







**Nick** @erupts · 4h

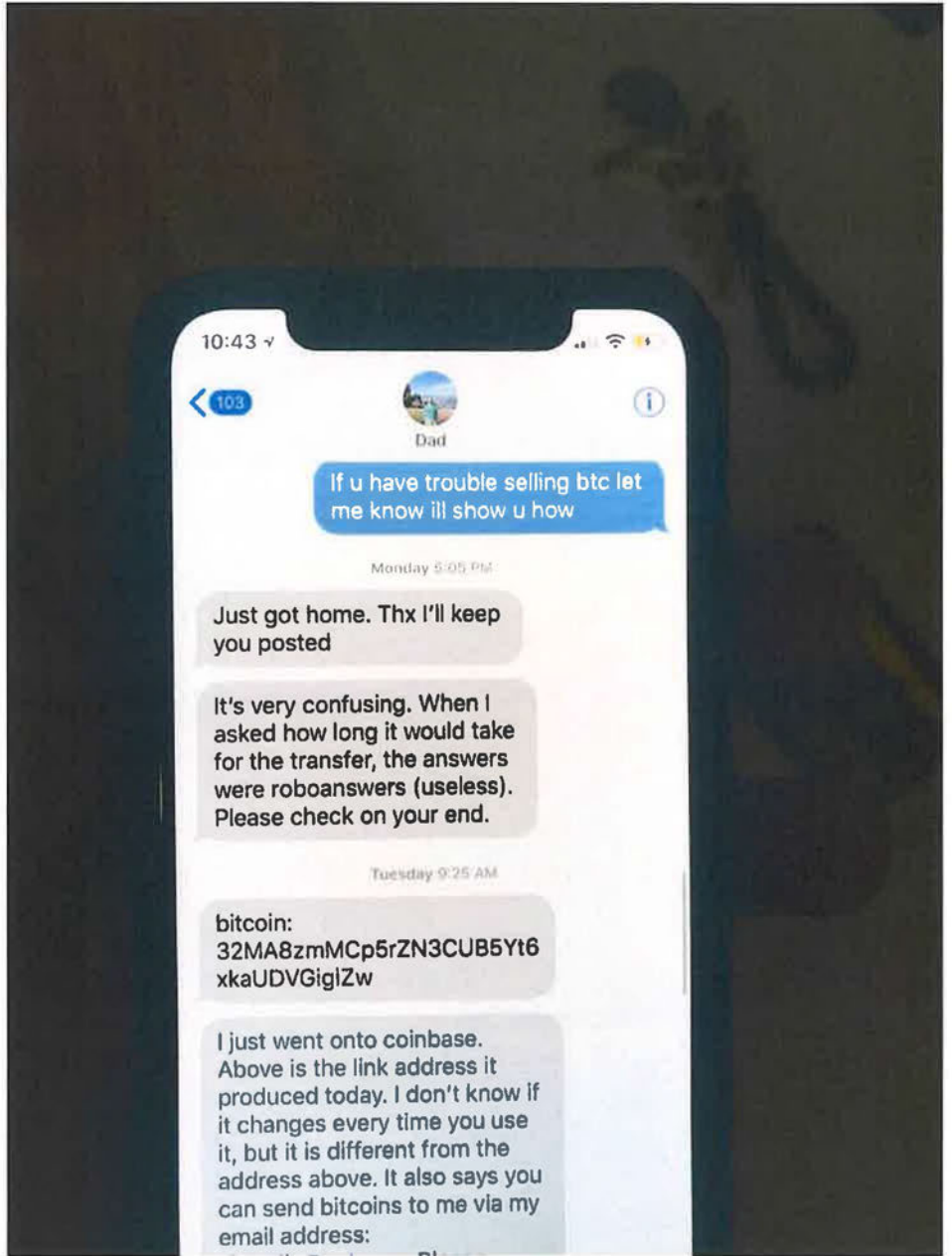
Stole 24 million dollars and still don't have my shit straight



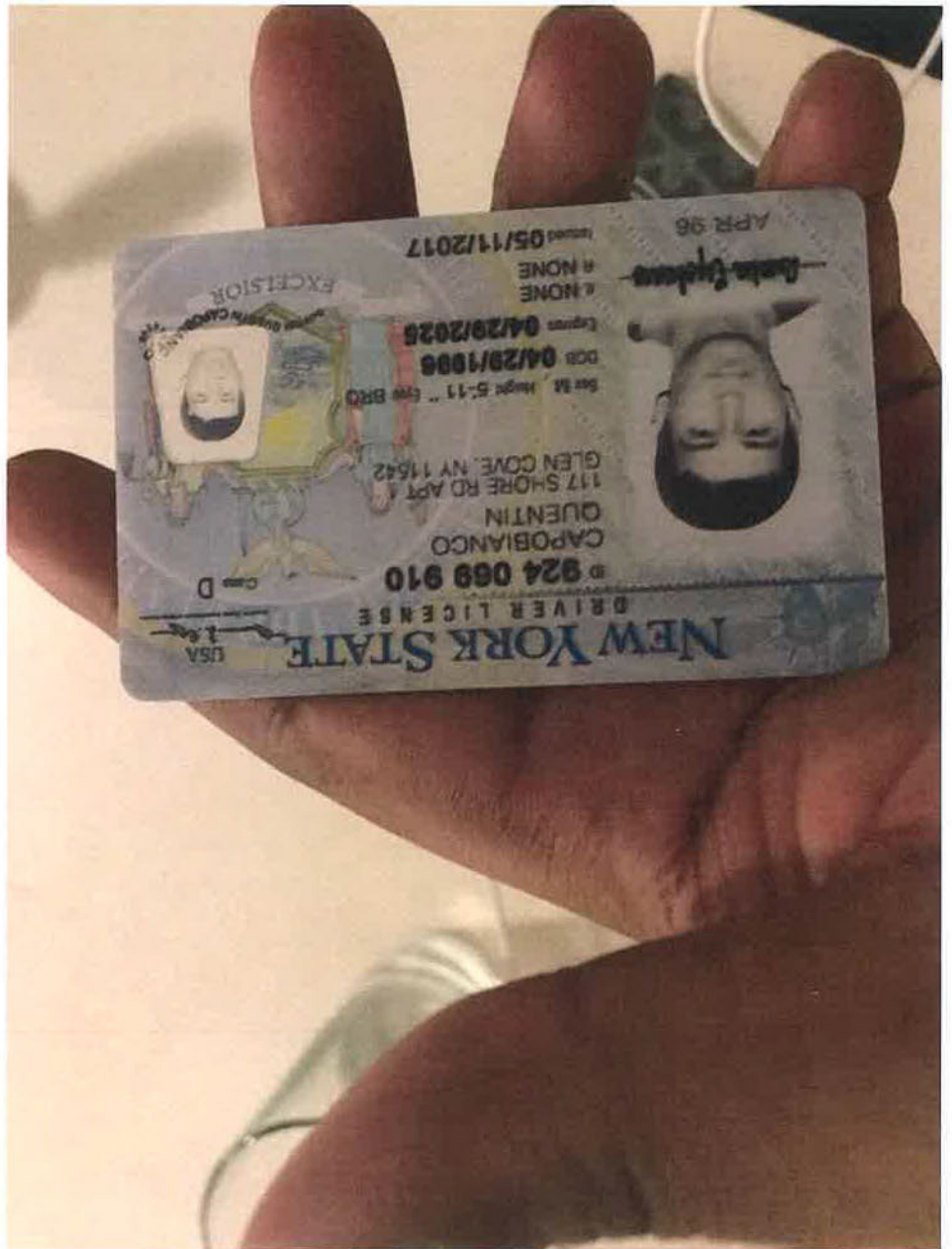


# EXHIBIT E

Nick dad 4.jpg



Fake ID Use 2.JPG





May 31, 2018

I, Quentin Capobianco, certify this is an authentic copy of my ID.

x Quentin Capobianco  
Quentin Capobianco

County of New York  
State of New York.



*[Signature]*  
May 31, 2018.



# EXHIBIT F

Awaiting Exhibit F From Witness