

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

RETROPHIN, INC.,

Plaintiff,

– against –

TIMOTHY PIEROTTI,

Defendant.

Index No. 651104/2013

Part 45

Hon. Melvin L. Schweitzer

**AFFIDAVIT OF TIMOTHY
PIEROTTI**

Timothy Pierotti, being duly sworn, deposes and says:

1. I am the defendant in this action, which plaintiff, Retrophin, Inc., commenced on March 27, 2013. I submit this affidavit in support of my Motion to Compel to demonstrate the unwelcome actions that Martin Shkreli, Retrophin’s CEO (“Shkreli”) has taken towards me and my family.

2. In particular, I submit this affidavit to provide first-hand evidence of the repetitive harassment that Shkreli has inflicted on not only me, but on my wife, teenage children, elderly father, as well as other family members. Shkreli has harassed me and my family for nearly a year, and his harassment intensified on and around this past Christmas. Indeed, Shkreli sent multiple unwelcome texts and social media messages to my family and me on Christmas Day.

3. In addition, I submit this affidavit to provide first-hand evidence of the breaches of five of my personal accounts, including my AOL email, Gmail, Facebook, LinkedIn, and Twitter accounts.

Shkreli Repeatedly Harassed My Family and I Throughout the Pendency of this Action

4. Shkreli has engaged in a campaign of harassing, disparaging, and embarrassing me over the past year. For example, in late January 2013, a letter – stating it was from Martin

Shkreli and referencing a Retrophin phone number – was sent to my wife via U.S. Mail and a separate, identical copy, via Federal Express. The letter claimed:

Your husband has stolen \$1.6 million from me and I will get it back. I will go to any length necessary to get it back . . . Having frozen your husband's stock account once, I will do so repeatedly until I get what is mine . . . Your pathetic excuse of a husband needs to get a real job that does not depend on fraud to succeed . . . I hope to see you and your four children homeless and will do whatever I can to assure this.

A true and correct copy of this letter is annexed hereto as Exhibit A. This letter was sent to my wife approximately two months before Shkreli filed the Summons with Notice in this action.

5. On March 27, 2013, the same day in which he filed the Summons with Notice in this action, Shkreli sent a message to my wife via Facebook, stating, “Hi Kristen. I hope you're well. Today, we are filing a summons demanding \$3 million in damages and penalties from you and your family, specifically your husband . . . I'm going to be sending copies of the summons with notice to everyone you and your husband know” My wife did not respond to Shkreli's message. A true and correct copy of a screenshot demonstrating what Shkreli had sent to my wife is annexed hereto as Exhibit B.

6. Also on March 27, 2013, Shkreli sent Facebook friend requests to my father and my brother. True and correct copies of the emails from Facebook demonstrating Shkreli's Facebook friend request to my father is annexed hereto as Exhibit C.

7. On June 6, 2013, Shkreli posted the Complaint in this action to my Facebook page. A true and correct copy of the email demonstrating what he had posted is annexed hereto as Exhibit D. I immediately removed the post and blocked Shkreli's account from accessing my Facebook page.

8. On October 25, 2013, Shkreli again sent a message to my wife via Facebook, stating, “How do you sleep at night? Your husband stole millions from me.” (See Ex. B.) My wife once again refused to respond.

9. On and around this past Christmas, Shkreli’s campaign of harassment intensified, as he continued contacting my wife and me, as well as my two teenage sons and my supervisor. On or around December 20, 2013, Shkreli sent a Facebook friend request to my 16-year old son. Shkreli followed-up with a Facebook message, stating, “hey. i’m a friend of your father.” When my son asked why Shkreli sent him a Facebook friend request, Shkreli responded, “because I want you to know about your dad . . . he betrayed me. he stole \$3 million from me.” True and correct copies of screenshots demonstrating Shkreli’s outreaches to my son via Facebook are annexed hereto as Exhibits E and F.

10. On or around Christmas Day, Shkreli also sent a Facebook friend request to my 14-year old son, who never responded. A true and correct copy of a screenshot demonstrating Shkreli’s Facebook friend request to my son is annexed hereto as Exhibit G.

11. At 10:00 pm on Christmas Day, Shkreli sent me a message via LinkedIn, stating simply, “Scumbag. – Martin Shkreli.” A true and correct copy of an email informing me of Shkreli’s post to my LinkedIn account is annexed hereto as Exhibit H.

12. On December 26, 2013, Shkreli sent a text message to my wife, stating, “hey sweetheart.” A true and correct copy of a screenshot demonstrating this message to my wife from Shkreli’s cell phone number ((646) 217-2783) is annexed hereto as Exhibit I.

13. On December 26, 2013, my current supervisor at Tera Exchange received a package with no return address. Inside the package was a copy of the Complaint as well as a New York Post article erroneously reporting that I was an unindicted co-conspirator. True and

correct copies of the package that was sent to my supervisor, along with its contents, is annexed hereto as Exhibit J. I believe that Shkreli sent this package based on its content and the fact that it occurred close in time to the communications to my family and me described above.

Five of My Personal Accounts Were Breached Within a Twenty-Four Hour Period After Christmas Day

14. I have two personal email accounts that I use for personal and business purposes. Since early 2011, I used one account associated with AOL ([REDACTED]@aol.com). In or around March 2013, my wife assisted me in creating a second account with Gmail ([REDACTED]@gmail.com), which became the main account with which I communicated. These email accounts contain sensitive business information, privileged communications, and other personal information that is wholly irrelevant to these proceedings. I routinely used these email accounts to communicate with my counsel regarding this action. In addition, these email accounts contain sensitive documents that are relevant to this action.

15. On December 26, 2013, at around 10:30 pm, I was awoken by a text that I received from my brother, who asked why I had posted the Complaint in this action on my Facebook page. I was incredulous because I had done no such thing. I immediately attempted to log-on to my Facebook account, but was denied access. A message appeared stating, "Your password was changed at: Today at 10:08pm." A true and correct copy of a screenshot demonstrating this message on the Facebook web page is annexed hereto as Exhibit K.

16. Indeed, when my wife logged into her Facebook account, she could see that the Complaint had been posted because it was visible on her News Feed. A true and correct screenshot demonstrating that the Complaint was posted under my Facebook account is annexed hereto as Exhibit L.

17. Realizing that someone else had accessed my account, and, indeed, was already posting unwanted material, I located the steps on Facebook's website that instructed me how to suspend a personal account. I followed these steps and, at around 11:00 pm, shut down my Facebook account.

18. I then attempted to access my AOL e-mail account, but again was denied access. Similar to Facebook, the AOL web page stated that my password was incorrect. I have my AOL password memorized, and I typed it in correctly. Despite repeated attempts, I could not gain access to my AOL account.

19. I similarly was denied access to my LinkedIn account when I attempted to log-on that evening. I soon received emails from colleagues notifying me that the Complaint in this action was also posted to my LinkedIn account. A true and correct copy of an email that I received from a colleague on January 1, 2014 demonstrating that the Complaint had been posted to my LinkedIn account is annexed hereto as Exhibit M.

20. At around 11:45 pm that evening, I went to the Summit, New Jersey, Police Department and filed a report. A true and correct copy of the December 26, 2013 report annexed hereto as Exhibit N.

21. The next morning, December 27, 2013, at around 7:45 am, my wife received an email alerting her that the password information on my Gmail account had been changed. A true and correct copy of the email my wife received demonstrating that my Gmail password had been changed is annexed hereto as Exhibit O. I immediately attempted to access the account, but was denied.

22. At around 10:45 am, I notified the Summit Police Department of the Gmail breach. By this point, given the outreach to our two young sons and our lack of control over our

social media and email accounts, my wife and I had were in a highly agitated state. I therefore provided a full detail to the Summit Police regarding the series of harassing and degrading messages that my family and I received. The police officer who I spoke to assured me that he would contact Shkreli and advise Shkreli not to contact me or my family again. A true and correct copy of the December 27, 2013 report is annexed hereto as Exhibit P.

23. Over the subsequent days, I was able to regain access to my Gmail and AOL email accounts. When I was able to regain access to my AOL account, I noticed that I had received a series of emails from AOL, Gmail, and Facebook, notifying me that each of these accounts' passwords had been reset on December 26. In addition, there was an email notification from my Twitter account that its password had been changed on December 27. A true and correct copy of a screenshot demonstrating my inbox, and these emails contained therein, is annexed hereto as Exhibit Q.

24. In addition, my AOL account contained an email from Facebook on December 26, 2013. The email stated that my Facebook account had been reset using my AOL email address on December 26, 2013 at 10:08. Importantly, the email provided information regarding the computer that was used to access my account and reset the password:

Operating System: Windows

Browser: IE

IP address: 38.122.241.243

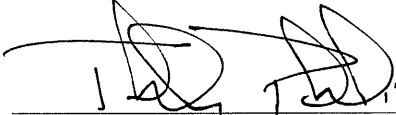
Estimated location: New York, NY, US

A true and correct copy of this email demonstrating the above information is annexed hereto as Exhibit R.

25. On December 28, 2013, Shkreli left me a voicemail, stating that he regretted that I felt that I had been harassed and that he apologized if he had anything to do with that. I notified the Summit Police of this voicemail on December 31, 2013. The police officer advised me that they would follow-up on my report.

26. On January 8, 2014, I requested a copy of the third report from the Summit Police Department. I received an email response from them notifying me that they were unable to release the third report as it was a part of an on-going criminal investigation. A true and correct copy of this email is annexed hereto as Exhibit S.

Dated: New York, New York
January 16, 2014



Timothy Pierotti

Sworn to me this
16 day of January, 2014.

Sarah Otey Ciesielczyk
Notary Public

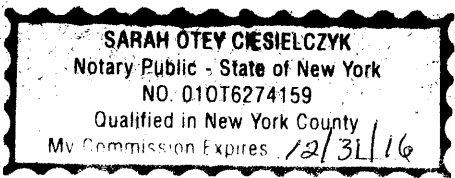


EXHIBIT A

Kristen Pierotti,

Hello Kristen. It was nice to meet you last year at the MISCASTS event. Unfortunately, I am writing this letter to you under less favorable circumstances. Your husband has stolen \$1.6 million from my organization and I am pursuing legal action to get it back.

From Day 1 Tim was a terrible employee. My partners and I handed Tim a brand new hedge fund and asked him to do what we thought he knew how to do best – trade and invest. Unfortunately, Tim's idea of investment analysis is nothing more than parroting what he's read on the news. I tried to give Tim new training and tools that would make him semi-marketable in the modern investment world. Tim refused to lift a finger when it came to applying my robust investment methodologies. Instead, Tim chose to leave at 5pm every day, expecting his awful method of picking stocks which hasn't worked his entire career would somehow start working. Finally, Tim was asked to market his fund to new investors and failed to do so. Tim is the kind of person that gives up when the going gets hard and blames others for his shortcomings. We shut Tim's fund down recently and gave him a reasonable severance.

When Tim informed my partner Marek that he was "going to sell his wife's jewelry to pay for their mortgage", I immediately summoned Tim to our offices and gave him a personal check for \$5,000. Tim promptly deposited it that day. Tim likes taking my money and doing nothing for it. I told Tim that if he ever needed funds he could rely on me to provide them for him, provided that he worked hard. Of course, Tim doesn't like that part.

We recently re-negotiated Tim's association with our companies which would provide him, in exchange for showing up to work every day and applying his efforts to grow our collective wealth, 400,000 shares of Retrophin, the company I started. Tim took the stock and ran off. He refuses to return our phone calls. This is called fraud.

I had Tim's stock account frozen at his brokerage firm. I am a very determined person, Ms. Pierotti. Your husband has stolen \$1.6 million from me and I will get it back. I will go to any length necessary to get it back. Mr. Pierotti has informed my partner that you or he have some kind of legal counsel to assist you against a "frivolous" lawsuit. This is not frivolous. Your husband has broken a contract that no less than 7 people are willing to sign an affidavit attesting to. I offered your husband \$40,000 for the safe return of what is rightfully mine and he refused. Instead, he prefers to continue to commit crimes of fraud just as he did at his prior employer, the Galleon Group and probably did at his other prior employer, Incremental.

Having already frozen your husband's stock account once, I will do so repeatedly until I get what is mine. My lawyers believe I this is an open-and-shut case. Your pathetic excuse of a husband needs to get a real job that does not depend on fraud to succeed. We've worked hard to build Retrophin into a success, something Tim has had nothing to do with. Tim did nothing to build his sad fund into something even remotely substantial and I saw no reason to support his lack of effort.

Needless to say, when I initiate my litigation, I will sue both you and your husband for fraud. I am going to inform the bank who holds your mortgage and local police department that you have committed fraud. I hope to see you and your four children homeless and will do whatever I can to assure this. Your husband's arrogance is infuriating and making an enemy out of me is a huge mistake. I am tempted to withdraw my offer for \$40,000 to make this all go away, but I implore you to reason with your husband. \$40,000 is enough for him to get off of his ass and find a real job, something I know he truly has no interest in doing. However, I will leave the offer open as I know you have no interest in you and your husband being sued for fraud and your bank terminating your mortgage, something I assure you I will stop at nothing to accomplish.

Thank You,

Martin Shkreli
1-212-983-1310

EXHIBIT B

Inbox (26) Other (7)

More

Martin Shkreli

New Message Actions



Martin Shkreli

9:37:11 PM

Hi Kristen. I hope you're well. Today, we are filing a summons demanding \$3 million in damages and penalties from you and your family, specifically your husband. We are alleging fraud, fraudulent inducement and other charges which we can easily prove with written records and testimony from Tim's colleagues (6 people). I regret your husband's dishonesty and willingness to steal large amounts of money from me and my firm. We will get it back and then some. I'm going to be sending copies of the summons with notice to everyone you and your husband know, and probably subpoena you and your contacts to ensure appropriate discovery of facts. You're one of 35 people who will receive notice today.

10/20/14



Martin Shkreli

10:11:10 AM

How do you sleep at night? Your husband stole millions from me.

Write a reply...

Add Files

Add Photos

Press Enter to send

Friend Requests



Jonathan Bushnell
8 mutual friends
Confirm Friend

Sponsored

Lowe's Fire Pits!
lowes.com



Finish off your space with a new fire pit fr

Tiny Prints Cards
tinyprints.com



Celebrate 2014 Custom New Cards! Plus Sa

KIDS' COLD-WEATHER BOOTS
shop.nordstrom.com



Winter styles from SOREL, Bogs & NORDSTROM. Shipping & Re

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Martin Shkreli

REDACTED

REDACTED

REDACTED

EXHIBIT C

REDACTED

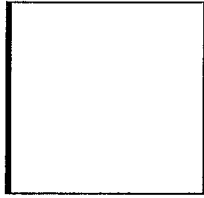
REDACTED

----- Forwarded message -----

From: Chuck Pierotti <[REDACTED]@bellsouth.net>
Date: Wed, Mar 27, 2013 at 12:55 PM
Subject: FW: Martin Shkreli wants to be friends on Facebook
To: [REDACTED]@gmail.com

From: Facebook [mailto:notification+kr4ma25rsqmx@facebookmail.com]
Sent: Wednesday, March 27, 2013 10:22 AM
To: Chuck Pierotti
Subject: Martin Shkreli wants to be friends on Facebook

facebook



Martin Shkreli wants to be friends with you on Facebook.

52 notes

[Confirm Request](#)

[See All Requests](#)

This message was sent to chuckpierotti@bellsouth.net. If you don't want to receive these emails from Facebook in the future, please [unsubscribe](#).

Facebook, Inc., Attention: Department 415, PO Box 10005, Palo Alto, CA 94303

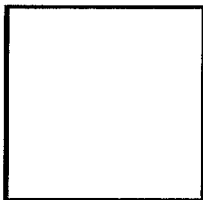


EXHIBIT D

REDACTED

Begin forwarded message:

From: "Facebook" <notification+pk_uhuhm@facebookmail.com>
Date: June 6, 2013, 5:28:27 PM EDT
To: Timothy Pierotti <████████@aol.com>
Subject: Martin Shkreli posted on your timeline
Reply-To: Reply to Comment
<e+1ly9khd000000q74gp702sfulu8ccgk000000000000000000000002d41i@reply.facebook.com>

facebook

EXHIBIT E

Inbox (50) Other (16)

More

Martin Shkreli

New Message Actions

Conversation started December 20, 2013



Martin Shkreli

hey. I'm a friend of your father.

12/20, 4:44pm

December 20, 2013



Pierotti

ok so why did you friend me?

12/20, 8:57pm

December 21, 2013



Martin Shkreli

im surprised you don't know who I am. I was your dad's boss

12/21, 10:19am

December 21, 2013



Pierotti

ok so why did you friend me?

12/21, 7:22pm

December 24, 2013



Martin Shkreli

because I want you to know about your dad

12/24, 9:47am

You cannot reply to this conversation. Either the recipient's account was disabled or its privacy settings don't allow replies.

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It's Go Time!
powersports.honda.com



Honda Powers offering Low and Bonus Bu won't wanna

Domino's® Pizza
order.dominos.com



Pizza, Stuffed Bread, Wings, Available at Dominos.com Now!

Want Today's Hot Deals?
nextag.com



Save on Nike Posite Max "P Suns" Basketb Next Time, Ne

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REDACTED

REDACTED


EXHIBIT F

Inbox (50) Other (18)


More

Martin Shkreli


New Message Actions

 **Martin Shkreli** 12/21, 10:19am
im surprised you don't know who I am. I was your dad's boss

December 21, 2013


 **REDACTED Pierotti** 12/21, 7:22pm
ok so why did you friend me?

December 24, 2013

 **Martin Shkreli** 12/24, 9:47am
because I want you to know about your dad he betrayed me. he stole \$3 million from me.

December 24, 2013

 **REDACTED Pierotti** 12/24, 8:21pm
doubt it

 **Martin Shkreli** 12/24, 6:15pm
I sued him, ask him about it he took \$3m that didn't belong to him

You cannot reply to this conversation. Either the recipient's account was disabled or its privacy settings don't allow replies.

Sponsored

It's Go Time!
powersports.honda.com



Honda Powers offering Low F and Bonus Bu won't wanna

Domino's® Pizza
order.dominos.com



Pizza, Stuffed Bread, Wings, Available at Dominos.com Now!

Want Today's Hot Deals?
nextag.com



Save on Nike Posite Max "Pl Suns" Basketb Next Time, Ne

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REDACTED

REDACTED

EXHIBIT G

REDACTED
22 mutual friends

Confirm

Not Now

REDACTED

REDACTED
97 mutual friends

Confirm

Not Now

Martin Shkreli

Confirm

Not Now

REDACTED
34 mutual friends

Confirm

Not Now

REDACTED

REDACTED
100 mutual friends

Confirm

Not Now



REDACTED



News Feed



Requests



Messages



Notifications



More

EXHIBIT H

REDACTED

Begin forwarded message:

From: Martin Shkreli via LinkedIn <member@linkedin.com>
Date: December 25, 2013, 10:01:16 PM EST
To: timothy pierotti <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>
Subject: timothy, please add me to your LinkedIn network
Reply-To: Martin Shkreli <[\[REDACTED\]@retrophin.com](mailto:[REDACTED]@retrophin.com)>

LinkedIn

Scumbag.

- Martin Shkreli

[Accept](#) [View Profile](#)

You are receiving invitation emails: [Unsubscribe](#)

This email was intended for timothy pierotti (Timothy Pierotti Investments). [Learn why we included this](#). © 2013 LinkedIn Corporation. 2029 Stierlin Ct. Mountain View, CA 94043, USA

EXHIBIT I

REDACTED

Begin forwarded message:

From: Kristen Pierotti <[REDACTED]@gmail.com>
Date: January 15, 2014, 1:17:09 PM EST
To: timothy pierotti <[REDACTED]@gmail.com>
Subject: Text from Martin

Messages

646-217-2783

Edit

Call

FaceTime

Contact >

iMessage

Dec 26, 2013, 2:54 PM

Hey sweetheart

EXHIBIT J

GUESS WHO GOT A MAKEOVER?

BUSINESS

Jam-packed day at Gupta trial

May 30, 2012 | 4:00am

By Kaia Whitehouse

Ex-Galleon Group trader Michael Cardillo testified yesterday in the trial of Rajat Gupta that he bought shares of JM Smucker, the maker of Smucker's jams, after getting a tip that the company was going to buy Procter & Gamble's coffee business.

In his second day on the stand, the 35-year-old trader turned prosecution witness said RK Rajaratnam, the brother of convicted Galleon boss Raj Rajaratnam, told him the tip "was coming from Raj's guy at P&G."

Cardillo said he didn't know who "Raj's guy" was at the time, but prosecutors believe his testimony will link the leak to Gupta, accused of tipping Raj to confidential info at Goldman Sachs and P&G, when he served on their boards.

Cardillo said he executed trades for RK, who snapped up as much as 25 percent of Smucker shares after learning of the tip. Cardillo said he also bought Smucker stock for himself and fellow portfolio manager Tim Pierotti.

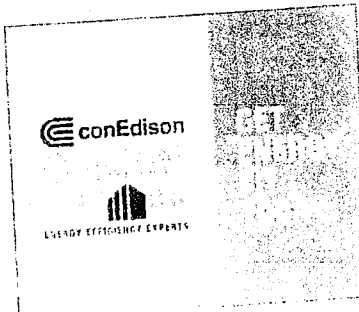
A person close to the case told The Post that Pierotti filed a whistleblower complaint with the Securities and Exchange Commission in 2010 related to RK's statements concerning what Raj knew about Goldman and P&G.

It's unclear if Pierotti will be called to testify against Gupta, although his name is on the government's list of possible witnesses. Pierotti's lawyer, Stuart Meissner, declined to comment.

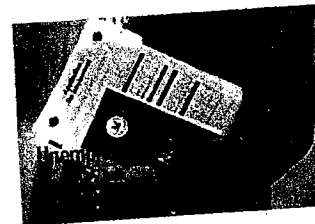
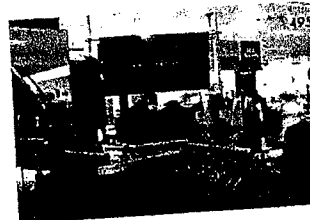
Earlier in the trial, Gupta's defense lawyer, Gary Naftalis, told jurors the government might call a "bounty-hunter" to testify.

He was referring to new rules that allow the SEC to share money it collects with those whose tips lead to substantial fines and penalties.

Yesterday, Naftalis sought to discredit Cardillo by asking about cash he received for helping convicted felon Craig Drimal, who traded a personal account at Galleon, execute trades on tips from another ex-Galleon trader, Zvi Goffer. Cardillo said he once accepted \$50,000 in cash for helping Drimal.



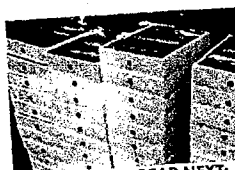
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YOU MIGHT ALSO LIKE



Homeowners Are In For A Big Surprise...



READ NEXT: Facebook stocks reach new low...

NOW ON

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

RETROPHIN, INC.,

Plaintiff,

— against —

TIMOTHY PIEROTTI,

Defendant.

Index No. 651104/2013

COMPLAINT

Plaintiff, Retrophin, Inc. ("Plaintiff"), by its attorneys Katten Muchin Rosenman LLP, as and for its Complaint against defendant, Timothy Pierotti ("Defendant"), alleges as follows.

Nature of the Action

1. This is an action where Plaintiff—a groundbreaking biotech startup specializing in the discovery and development of treatments for rare and life-threatening diseases—seeks to recover 350,000 shares of its common stock that was taken by Defendant. In or about December 2012, Plaintiff facilitated Defendant's acquisition of these shares of common stock at a deeply discounted price (\$0.001 per share, as compared to the current market price which has ranged between \$8.00 and \$8.80 per share) based on Defendant's express promise to work to build and develop Plaintiff, including, *inter alia*, identifying revenue-generating acquisition targets for Plaintiff.

2. However, once Defendant obtained his shares of Plaintiff's stock, Defendant abruptly reneged on his promise to Plaintiff by, *inter alia*, terminating his affiliation with Plaintiff and absconding with the stock, thus realizing an extraordinary windfall insofar as the

EXHIBIT K



Sorry! You Entered An Old Password

Your password was changed at: Today at 10:08pm

Do you remember making this change?

 No

- Mobile
- Find Friends
- Badges
- People
- Pages
- Places
- Apps
- Games
- Music
- About
- Create Ad
- Create Page
- Developers
- Careers
- Privacy
- Cookies
- Terms
- Help

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EXHIBIT L



Kristen McCormick Pierotti
Edit Profile

Update Status

Add Photos/Video

FAVORITES

News Feed

Messages 26

Events

Photos

Browse

APPS

Games 1

Games Feed 20+

Gifts

Music

Notes

Links

Pokes 1

On This Day

Smarter Than A 5th Gra...

GROUPS

Boston College Cl... 20+

Pierotti Power - A ... 3

Create Group...

PAGES

Pages Feed 4

Like Pages 18

Create a Page...

Boston College 20+

Cohasset Junior - ... 1



Timothy Pierotti
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
RETROPHIN, INC.,

Plaintiff,

- against -

TIMOTHY PIEROTTI,

Defendant.

:

:

Index No. _____

IAS Part

COMPLAINT
----- X

Plaintiff, Retrophin, Inc. ("Plaintiff"), by its attorneys Katten Muchin Rosenman LLP, as and for its Complaint against defendant, Timothy Pierotti ("Defendant") alleges as follows.
Nature of the Action

1. This is an action where Plaintiff—a groundbreaking biotech startup specializing in the discovery and development of

REDACTED

REDACTED

3 upcoming birthdays

Music Pages You May Like See All



U2
Scott Williamson and 15 other friends like this.
Like

Justin Bieber
Shannon Benuscak and 3 other friends like this.
Like

Sponsored See All

AT&T

Just like your favorite holiday, a new smartphone for 50 with AT&T Next will come once a y...



Like Page

Disney Club Penguin Club Penguin



#1 Kids' Virtual World
—Peace of mind for parents and endless

Home Kristen

Best-Selling SOREL Boots
zappos.com



Fast, free shipping & free returns at Zappos®.

NORDSTROM: Up to 50% off!
shop.nordstrom.com



Shop Women's Winter Clearance dresses now! Free shipping and returns.

Ellen Caught In A Lie?
ellentv.com



Ellen Has Been Exposed! Find Out The HUGE SECRET That She Has Been Hiding From Fans!

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treatments for rare and life-threatening diseases—seeks to recover from Defendant 350,000 shares of its common stock. In or about December 2012, Plaintiff facilitated Defendant's acquisition of these shares of common stock at a deeply discounted price (\$0.001 per share, as compared to the current market price of \$8.80 per share) based on Defendant's express promise to work to build and develop Plaintiff, including, inter alia, identifying revenue-generating acquisition targets for Plaintiff.

2. However, once Defendant obtained his shares of Plaintiff's stock, Defendant abruptly reneged on his promise to Plaintiff by, inter alia, terminating his affiliation with Plaintiff and absconding with the stock, thus realizing an extraordinary windfall insofar as the shares are now worth 8,800 times more, i.e., \$3,080,000, than what Defendant paid for them, i.e., \$400.

Like · Comment · Share · 23 minutes ago ·



REDACTED Wow. You're either rich or screwed.

16 minutes ago · Like



REDACTED

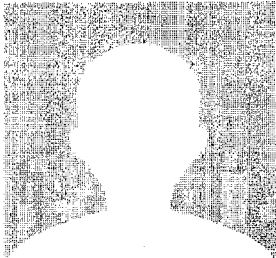
EXHIBIT M

REDACTED

From: REDACTED
Sent: Wednesday, January 01, 2014 5:33 PM
To: Timothy Pierotti
Subject: FW: Congratulate REDACTED on the new job

FYI: I imagine you are aware of this Shkreli stuff, but more LinkedIn nonsense below.

From: messages-noreply@bounce.linkedin.com [mailto:messages-noreply@bounce.linkedin.com] **On Behalf Of** LinkedIn Updates
Sent: Wednesday, January 01, 2014 11:28 AM
To: REDACTED
Subject: Congratulate REDACTED on the new job



REDACTED

Congratulate REDACTED

New Positions

REDACTED

Professional Milestones

REDACTED

What Your Network is Saying



timothy pierotti "SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK ----- x
RETROPHIN, INC., Plaintiff, – against – TIMOTHY PIEROTTI, Defendant. : :
COMPLAINT ----- x

Like • Comment



timothy pierotti diseases—seeks to recover from Defendant 350,000 shares of its common stock. In or about December 2012, Plaintiff facilitated Defendant's acquisition of these shares of common stock at a deeply discounted price (\$0.001 per share, as compared to the current market price of \$8.80 per share) based on Defendant's express promise to work to build and develop Plaintiff, including, inter alia, identifying revenue-generating acquisition targets for Plaintiff.

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timothy pierotti Plaintiff, Retrophin, Inc. ("Plaintiff"), by its attorneys Katten Muchin Rosenman LLP, as and for its Complaint against defendant, Timothy Pierotti ("Defendant") alleges as follows. Nature of the Action

Like • Comment



timothy pierotti 2. However, once Defendant obtained his shares of Plaintiff's stock, Defendant abruptly reneged on his promise to Plaintiff by, inter alia, terminating his affiliation with Plaintiff and absconding with the stock, thus realizing an extraordinary windfall insofar as the shares are now worth 8,800 times more, i.e., \$3,080,000, than what Defendant paid for them, i.e., \$400.

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timothy pierotti 1. This is an action where Plaintiff—a groundbreaking biotech startup specializing in the discovery and development of treatments for rare and life-threatening diseases—seeks to recover from Defendant 350,000 shares of its common stock. In or about December 2012, Plaintiff facilitated Defendant's acquisition of these shares of common stock at a deeply discounted price (\$0.001 per share, as compared to

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timothy pierotti Plaintiff, Retrophin, Inc. ("Plaintiff"), by its attorneys Katten Muchin Rosenman LLP, as and for its Complaint against defendant, Timothy Pierotti ("Defendant") alleges as follows. Nature of the Action 1. This is an action where Plaintiff—a groundbreaking biotech startup specializing in the discovery and development of treatments for rare and life-threatening

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Profile Changes in Your Network

Update your profile

REDACTED

REDACTED

New Connections

REDACTED

People You May Know

REDACTED

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This email was intended for John Gallagher (Head of Business Development at TaraExchange). [Learn why we included this.](#)

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EXHIBIT N

Summit Police Department
 512 Springfield Avenue
 Summit NJ 07901
 Phone # : (908)273-0051 Fax : (908)273-8002

Master Incident Report

13-032135

Report Prepared By : Kwiatek Keith On : 12/27/2013 @ 00:14:28

Section I : Incident Information:				
RMS Case # 13-032135	CAD Event # 130031795	Reported Date/Time 12/26/2013 23:45:47	Reporting Officer Name Kwiatek Keith	Officer PID 0118
CAD CFS Code 1100	CAD CFS Description Fraud		RMS CFS Code 2653	RMS CFS Description Harassment
Occurred From 12/26/2013 23:45:47	Occurred To 12/26/2013 23:45:47	Location of Incident REDACTED		

Section II : Offense Information (M.O. / Solvability Factors)				
Offense # 1	CFS Description Harassment	CFS Code 2653	NIBRS	Offense Status

Section III : Name Details					
Name # 1	Name Type	Reason Code Caller			
Business Name Pierotti					
First Name Timothy	Middle Name J	Suffix	SSN REDACTED		
Address REDACTED					
Age (YRS) 42	DOB 07/17/1971	Sex Male	Race White	Ethnicity Not of Hispanic Origin	Resident Status
Weight (LB) 161	Height (FT) 5'09"	Eye Color Blue		Hair Color	
Driver License # REDACTED	DL State New Jersey	DL Expiry Month		DL Expiry Year	
Phone Information					
ContactType Home			Phone# REDACTED		

Section VI : Narrative	
Narrative Title	Main Narrative
<p>I responded to HQ, on a walk in report of fraud. Upon arrival I spoke with Timothy Pierotti, who stated Martin Shkreli, has been harassing him and his family over the past couple months. Mr.Pierotti stated that his Facebook, AOL and Linked In account were hacked. Mr.Pierotti stated that all passwords were changed and a document was posted to his facebook account. Mr.Pierotti</p>	

Master Incident Report

13-032135

Report Prepared By : Kwiatek Keith On : 12/27/2013 @ 00:14:28

stated that he is being sued by Mr.Shkreli in New York State. The document that was posted on his facebook account was a legal document from the law suit. Mr.Pierotti stated that Mr.Shkreli has texted his family's cell phones several times and has sent a nondescript package to his business at REDACTED in Summit. At this time the above actions listed have become a extreme nuisance to both his personal and professional life. The victim wished to document this situation to police as a matter of record. I attempted to make contact with Mr.Shkreli via telephone() to advise him to stop harassing Mr.Pierotti, I was unable to make contact and left a voice message on Mr.Shkreli cell phone advising him of the complaint. Mr.Pierotti was satisfied. I advised Mr.Pierotti that all information will be documented. No further action at this time.

Section VII : Officer

Reporting Officer's Name
Kwiatek Keith - 0118

Approving Supervisor's Name
Sam Rutkowski 0102

Approval Status
APPROVED

Date/Time
12/27/2013 05:21:32

EXHIBIT O

REDACTED

Begin forwarded message:

From: no-reply@accounts.google.com
Date: December 27, 2013, 7:48:47 AM EST
To: [REDACTED]
Subject: Google Account password changed

Google

timothy pierotti



Hi timothy,

The password for your Google Account [\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com) - was recently changed. If you made this change, you don't need to do anything more.

If you didn't change your password, your account might have been hijacked. To get back into your account, you'll need to reset your password.

[Reset password](#)

Sincerely,
The Google Accounts team

This email can't receive replies. For more information, visit the Google Accounts Help Center.

If tim.pierotti@gmail.com isn't your Google Account, [click here](#) to disconnect your email address from this account.

You received this mandatory email service announcement to update you about important changes to your Google product or account.

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Google



EXHIBIT P

Summit Police Department

512 Springfield Avenue

Summit NJ 07901

Phone # : (908)273-0051 Fax : (908)273-8002

Supplementary Incident Report 001

13-032135

Report Prepared By : Maggiulli Kathleen On : 12/27/2013 @ 13:21:38

Section I : Incident Information				
RMS Case # 13-032135	CAD Event # 130031795	Reported Date/Time 12/26/2013 23:45:47	Reporting Officer Name Maggiulli Kathleen	Officer PID 0099
CAD CFS Code 1100	CAD CFS Description Fraud		RMS CFS Code 2653	RMS CFS Description Harassment
Occurred From 12/26/2013 23:45:47	Occurred To 12/26/2013 23:45:47	Location of Incident REDACTED		
CAD Disposition Code : RPT	CAD Disposition Description	RMS Disposition	RMS Disposition Date	

Section VI : Narrative	
Narrative Title	Main Narrative
	<p>On 12/27/13 I took a follow-up report from Mr Timothy Pierotti about a fraud and harassment complaint that was filed last night. Mr Pierotti provided me with new information about his email accounts being hacked, as well as his wife and children being contacted by Mr Martin Shkreli.</p> <p>Mr Pierotti stated that initially his email account [REDACTED] com had been hacked. This allowed the suspected hacker Mr Shkreli access to not only that email account but also the Facebook and LinkedIn accounts that are associated with that email address. On today's date Mr Pierotti's Gmail account, [REDACTED]@gmail.com, was accessed without his authorization. Mr Pierotti advised me that the passwords on all email accounts and associated accounts had been changed prior to him being made aware of the breach. In addition prior to the Facebook account being disabled, multiple postings had been made on Mr Pierotti's account of legal documents in regards to ongoing civil litigation between Mr Shkreli and himself. Mr Shkreli reached out to three of Mr Pierotti's family members sending them Facebook friend requests. Mr Pierotti's wife Kristen and 14 year old son [REDACTED] denied the requests. [REDACTED] Mr Pierotti's 16 year old son accepted the request and then began receiving messages saying that his father had stolen money, betrayed Mr Shkreli, and should be ashamed. Not long after receiving these messages the family blocked Mr Shkreli from the accounts.</p> <p>Mr Shkreli contacted the family several times over the past few days: Requesting that Mr Pierotti meet him on Christmas, and texting Mrs Pierotti "hey sweetie" yesterday multiple times.</p> <p>On 12/26/13 Mr Pierotti's boss at [REDACTED] received a package from Mr Shkreli containing legal documents from the civil matter that is going on in New York State.</p> <p>I was able to make contact with Mr Shkreli on his cell phone at ([REDACTED]). Mr Shkreli initially denied even knowing Mr Pierotti, however when I made him aware that I had knowledge of the Facebook friend requests he stated, I haven't talked to him in years, well at least a year. I advised Mr Shkreli of the accusations being made and Mr Shkreli advised me that he hasn't talked to Mr Pierotti in over a year so how could he be harassing him. I suggested to Mr Shkreli that he listen to what I was advising him of and not to try make denials based on word semantics.</p> <p>Mr Shkreli continued to state that if he hasn't talked to someone in over a year how could he be harassing them. I again outlined for Mr Shkreli what he has been accused of. I told him that should any of the behaviors continue: contacting any of the family members via phone, text, email, or in person, contacting Mr Pierotti's employers, or accessing Mr Pierotti's email accounts, it would be considered harassment as he has been verbally advised by myself this behavior needs to stop. Mr Shkreli then hung up the phone on myself.</p> <p>Mr Pierotti was advised that should any contact be made with himself or the family, the police should be notified immediately.</p>

Section VII : Officer	
Reporting Officer's Name Maggiulli Kathleen - 0099	Approving Supervisor's Name Michael Treiber 0092

Supplementary Incident Report 001

13-032135

Report Prepared By : Maggiulli Kathleen On : 12/27/2013 @ 13:21:38

Approval Status APPROVED	Date/Time 12/27/2013 19:24:16
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EXHIBIT Q

SEARCH

ktpleroiti
Sign Out | Options

EMAIL	IM	TEXT	CHECK	KEEP AS NEW	REPLY	REPLY ALL	FORWARD	ACTION	DELETE	SPAM	All 4654	Customize
Search Mail				FROM				SUBJECT				DATE
					Facebook			REDACTED Hi Timothy, ...	shared a link...			2:10 pm
Today on AOL												
					Twitter			Your Twitter password has been chan...	You recently changed the password associate...			Fri Dec 27
					account-verification-noreply			Google Email Verification	Welcome to Google Accounts. To activate you			12/26/2013
					Facebook			Someones may have accessed your ac...	Secure Your Account Now https://www.face...			12/26/2013
					account-verification-noreply			Google Email Verification	Welcome to Google Accounts. To activate you			12/25/2013
					Facebook			You requested a new Facebook pass...	This message contains a rich-text HTML partic...			12/26/2013
					Facebook			REDACTED commented on your st...	See Comment ...			12/26/2013
					Facebook			Facebook password reset	Hi Timothy, Your Facebook password was res...			12/26/2013
					Facebook			You requested a new Facebook pass...	This message contains a rich-text HTML partic...			12/26/2013
					AOLHelp			ktpleroiti AOL Account Password Res...	Dear AOL User, Our records show that the pas...			12/26/2013
					REDACTED			REDACTED	REDACTED			12/23/2013
Notes												

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INSURANCE

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We make it easy to compare rates and save.

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AIG STATE AIR FARMAY

Choose a message above to view it here.

EXHIBIT R

REDACTED

-----Original Message-----

From: Facebook <notification+pk_uhuhm@facebookmail.com>

To: Timothy Pierotti <[REDACTED]@aol.com>

Sent: Thu, Dec 26, 2013 10:08 pm

Subject: Facebook password reset

facebook



Hi Timothy,

Your Facebook password was reset using the email address [REDACTED]@aol.com on Thursday, December 26, 2013 at 10:08pm (EST).

Operating system: Windows

Browser: IE

IP address: 38.122.241.243

Estimated location: New York, NY, US

If you did this, you can safely disregard this email.

If you didn't do this, please secure your account.

Thanks,
The Facebook Security Team

This message was sent to [REDACTED]@aol.com at your request.
Facebook, Inc., Attention: Department 415, PO Box 10005, Palo Alto, CA 94303



EXHIBIT S

REDACTED

From: Tim Pierotti <[REDACTED]@gmail.com>
Sent: Wednesday, January 08, 2014 10:30 AM
To: Frank, Pete
Cc: Elizabeth Rice
Subject: Re: Request for information from Det. Rice

Thanks. I wrongly assumed it would be available like the initial reports. Appreciate your help.

Tim Pierotti

On Jan 8, 2014, at 10:18 AM, "Frank, Pete" <PFrank@cityofsummit.org> wrote:

Mr. Peirotti,

Det. Rice is out sick for a few days, she asked me to contact you reference your email. The interview and or statement made to Det. Rice is part of an ongoing criminal investigation and we cannot release any Detective reports to you at this time. You are welcome to advise your lawyer about anything you told Det. Rice, but our Prosecutors Office acts on your behalf concerning criminal matters. The lawyer for the Prosecutors Office is not known at this time. When we call for complaint approval or to present the case for opinion, we will know who will approve the charges, which is not necessarily the same Prosecutor that will be assigned the case at trial. That all comes later in the process. All reports can be applied for through OPRA (public records act) once the case is completed and eligible for dissemination to the public. Thank you for your cooperation.

Det/Sgt. Peter Frank #49
City of Summit Police Department
Detective Bureau
Direct: 908-277-9389
Email: pfrank@cityofsummit.org