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1 Shaheryar Khan
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4 Shaheryar, Khan IN PRO PER

7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA

Case No.: **LACV21-3020-VAP-MAA**x

10 SHAHERYAR KHAN, S)

11 Plaintiff(s),

12 vs.

13 KENT SETON; ADAM KRAEMER; EDWARD)
14 CHARLES FOUNDATION, THRONE; DOES 1-)
10,000; ROES 1-10,000(S),)

15 Defendant(s).)

) Complaint

- 1.) BREACH OF CONTRACT
- 2.) COPYRIGHT INFRINGMENT
- 3.) FRAUD
- 4.) OBSTRUCTION OF JUSTICE
- 5.) SPOILATION OF EVIDENCE
- 6.) CONSPIRACY
- 7.) CORPORATE ESPIONAGE / *TRAD*
- 8.) CONFLICT OF INTREST *SECRET*

19 Complaint

20 Plaintiff Shahryar Khan, complains against Defendant Adam Kramer, Edward Charles Foundation,
21 and DOES 1-10,000 and Roes 1, 10000.

22 Parties

- 23 1.) Plaintiff Shaheryar Khan is an individual who is currently and was at all relevant times a
24 resident a state of California and had residence in Los Angeles county City of Los Angeles.
- 25 2.) defendant Adam Kraemer is an individual who was at all relevant times a resident of the state of
26 California as far as the plaintiff is aware.
- 27 3.) Defendant Throne Is a corporation working in California when the relevant events and times
28 occurred

1 4.) Defendant Kent Seaton is an individual who was at all relevant times a resident of the state of
2 California as far as the plaintiff is aware.

3 5.) Defendant Edward Charles Foundation is a corporation who was at all relevant times doing
4 business in of the state of California as far as the plaintiff is aware.

5 6.) The names and capacities whether individual, corporate, associate or other wise of the
6 defendants and or their alter egos are sued herein as DOES 1- 10000 and ROES BUSINESS
7 ENTITIES 1-10000, inclusive are presently unknown and Plaintiff will amend this complaint to
8 insert the names when ascertained. Khan also due to events where these defendant's spoliation
9 evidence will add additional facts and allegations as well as other parties to this case with he the
10 courts permission.

11 Facts

12 Plaintiff is the owner of intellectual property named in this complaint as A to Z and was authorized
13 to conduct business and to assign the temporary usage of rights through a license of intellectual
14 property and their goals as amended to conduct the relevant business activities along with khan's
15 partners whom did not have the authority to act on their own against khan's goals without his
16 consent. This consent would need to agreements of all partners and khan.

17 Since 2000 plaintiff has engaged in business activities and has had them misappropriated without
18 consent. Plaintiff was unaware of who or whom was infringing on the intellectual property and
19 trade secrets and copyrights. Plaintiff developed technology, trade secrets used in a copyright in late
20 2000. Plaintiff also came up with ideas, technology copyrights and trade secrets to develop
21 technology and copyrights and algorithms and used in loss mitigation and software in 2008. On or
22 about December 28th 2016 Defendant Adam Kraemer in Los Angeles after conferring with Adam
23 Kraemer after khan was referred to Kraemer by Brian Seigrist an associate of khan. Khan met Brian
24 Seigrist as Khan developed a real estate software and Business model back in 2008. Khan found it
25 odd that creamer had been asking questions and had concerns Kraemer was copying khan. he was
26 claiming he had a service business relevant a different business khan after khan would say his ideas
27 but did not declare so prior to their engagements khan developed these models back in 2000

28 Kramer was referred to Shahryar khan to aid the plaintiff to develop plaintiff's business model and
29 plan to deliver and create and implement khans Platform to be initially used methods for execution
30 which were to be applied to platforms using his methods and technology. Kraemer then referred
31 khan to meet with Kent Seaton to consult with to develop the appropriate strategies to develop his
32 business entities to use khan methods and develop khan's business.

33 Khan and Kent Seaton entered into an agreement and also included Edward Charles Foundation.
34 Kraemer and Seaton were both paid a consulting fee by khan to help him with the development of
35 the IP and Copyright agreed to be performed by Khan. Khan a conversation and khan Gottlieb had
36

1 years.

2 The defendants Kraemer and Seton were paid consultants and also entered into an agreement to
3 conduct business on 1/10/17 and itemized those details or about 3/16/17.

4 Due to the plaintiff's inability to access information plaintiff relied on the advice of the consultants
5 to help him execute the business. Khan was unaware at that time of the defendant's intent and
6 continuation of a conspiracy he had been involved in spanning over 20 years to harm the plaintiff.
7 Defendant Adam Kraemer sole purpose was to infringe on Shaheryar Khans intellectual property,
8 trade secrets and copyrights. After years of questions on who was hacking Khan. It became evident
9 that Kraemer and his accomplices had been tracking khan and using conflict of interest fraudulent
10 tactics to mislead khan into signing non-beneficial contract based on their advice and
11 recommendations which is not what was requested by khan to be devised. This advice had an
12 ulterior motive to legally steal from khan and have a private benefit to embezzle these right and
ownership that khan owned to transfer illegally to these conspirators and the defendants in this
action. Khan had signed a contract and had language that referred to privacy in this language to
infringing on the rights of khan. Khan realized later that Kramer was stealing his ideas when on
June 29th 2018 these emails were being deleted after Kramer denied copying khans copyrights.

13 On or about April 7th, 2017 Adam Kramer violated the copyrights of khans and illegally and
14 immediately purport rated this fraud. when he was copying khans copyright and intellectual
15 property onto his companies site after khans was telling him what khan had or was developing. On
16 or shortly after this date the defendant started to secretly develop these strategies using khans,
17 business income, intellectual property and violated the licensing agreement that was produced to
18 ties khan and the defendants to the privacy and infringement issues. Khans contract with Seton and
19 ECF which was developed in bad faith by the defendants was terminated on or about May 2017.
20 This contract was terminated after khan found out later by method of Computer hacking and falsely
21 making accounting disbursements online using khan computer which he did not do nor authorize.
22 Between April 10th and The transfer to ISI Seton had waited 45 days before he imitated the transfer
23 injuring khan's ability plan and conduct business. I was later found that Seton and Kramer had been
24 developing the businesses behind khans back during this time there were "stalling" Khan then was
25 transferred to ISI after ECF refused to let khan transfer to fox WM to transfer his project. Khan met
26 with WM and FOX as well as ISI and Loren Cole. khan was unaware at this time that his computers
27 were hacked and had unauthorized activity being conducted on them.

28 On or about sometime in May 2018 Kraemer met khan in San Francisco to discuss khan's business
29 and Kramer was having a whispering conversation about his meeting with apple and discussing a
30 meeting with a Sandler group for funding. he also said under his breath that he had been working
with a group related to MLB to his friend in which he had to leave khan to finish this private
conversation.

1 On or about 3/17/2018 khan was told that Kraemer had been developing khan's intellectual
2 property with IBM. On or about 3/18/18 Khan noticed that intellectual property rights and notes
3 were stolen from him while he was Indian wells conducting business. On or about 3/17/2018 khan
4 sent creamer a cease and desist letter to stop infringing on khan's copyrights. Kraemer denied the
5 allegations and did not surrender nor stop or address these issues to the plaintiff's knowledge. he did
6 deny that he had been conducting fraud or infringing on khan's copyrights. On or about May 25th
7 2018 a random event occurred when khan's images were being delete off his phone after he was
8 investigation some matters related to software he developed in 2009 related the creative commons
9 and Wiley group. I was unsure what this was about. On or about 6/29/2018 all of khan's email
10 related to the media and food platforms and evidence was being deleted by apple using developers
11 access to illuminate the conversation and emails and digital evidence khan owned and compile from
12 his phone and lap top. It was determining that Kramer and ECF and Seton had been using khans
13 own access to his emails to send emails as to themselves and other pretending to be khans if they
14 were khan from khan's devices to upload request to the defendants for money and email them
15 information khan had not approved or authorized. After Kramer denied these allegations to khan by
16 email in March 2018 The information being deleted was relevant Ophir Gottlieb, Adam Kramer,
17 Kent Seton and Edward Charles foundation and my emails about ESPN Khan was able to retrieve
18 and preserve some of the information. This made it evident that Kramer had lied to khan in March
19 2018 but these action of deleting this information off his email phones, and laptops on or about
20 6/29/2018 and this was the date Khan affirmed in his mind that this fraud was real and the cover up
21 began. On or about July 10th 2018 the lap top that had been hacked had been stolen out of khan's
22 hotel room. In Los Angeles CA. He had also been planting fake evidence and spoliation evidence.
23 On or about June 22 2019 khans I phones were hacked and emails and images uploaded to the cloud
24 had been delete live while that were being screen shot were being delete live. Khan at this time
25 realized that it was Ophir Gottlieb and Adam Kramer's groups that had been hacking him using the
26 authority from Mr. Fox to hide or delete the information. Khan was able to email some these images
27 to his lawyer and other. after the images were being delete the content on the internet was being
28 edited and erased from the web live while the screen shots were being delete he had just taken off
29 the phone. Due to the nature of this activity and the fraud this has been agonizing and frightening to
30 khan's ability to successfully use computers emails or keep and hold on to evidence and has caused
31 emotions distress and these criminal acts.

22 In October 2018 Khan found out that These groups had sold khans ideas for over 300,000,000
23 million dollars for his media platform, And may be involved in the loss of a multi Trillion Dollar
24 Platform as indicated on the 6/22/19 hacking date.

24 On or about December 2019 I had found out that khan assistant was accepting and participating in
25 payoffs and this conspiracy and khan's assistant had been stealing intellectual property, money, and
26 is appropriating copyrights as well to foreign and local companies and delivering these documents
27 to the conspirators. Khans assistant was deleting information related to khans' partnership and his
28 father's business and relevant information needed for their law suits and relevant evidence to his
29 fathers and partners many real estate complaints and other evidence related to software development
30

1 Defendants conspired to injure khan prior to engaging with khans on December 28th, 2016 to steal
2 and mislead khan to sign these agreements as consultants with ulterior motives to assign his
intellectual property

3 I did find out that there has been about 20 years of conspiracy on or about June 22nd 2019. On July
4 10th 2020 intellectual property had been stolen from my father residence as I was preparing for
5 these case which is relevant. the parties also revealed more Fraud. On or about august 2020 I found
6 out that the parties I had been working with were manipulating me and stealing information and
7 intellectual property and lying to me about the people I was meeting with. I found out that these
8 parties were actually stealing information and then passing along this information to conspirator
related to developing my Trade Secrets from the past 20 years. I may need to add more parties to
this case as investigations are ongoing and wish to ask the court the right leave to amend as needed.

9
10 Plaintiff suffered irreparable harm due to the negligence and fraud of the defendants

11 **Claim for relief**

12 **a.) Breach of Contract**

13 Plaintiff and defendants entered into agreements as set forth above
14 plaintiff performed his obligations under the agreement and contract
15 defendants breached the contract as set forth above
16

17
18
19 Misappropriation of intellectual property

20 **Copyright infringement**

21 Plaintiff exercised his right to work and allow the usage only of a license which was infringed upon
22 in violation of federal rule 501 as provided by sections 106 through 118 and in violation of 602

23 **Fraud**

24 Defendants violated the title 18 USC 1341

25 **Obstruction of Justice**

26 Defendants violated title 18 chapter 73 section 1519

27 **Spoliation of Evidence**

28

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