

UNITED STATES DISTRICT COURT

For the District of Massachusetts

Plaintiff:

Bo Shang

v.

Defendants:

1. **Gejing Deng**
2. **Yusi Gong**
3. **Beth Israel Lahey Deaconess Hospital**
4. **The Commonwealth of Massachusetts**
5. **[Names or “John Does”] Local Police Departments**
6. **[Names or “John Does”] Parents and Relatives**

Case No.: _____

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Bo Shang (“Plaintiff”), by and through himself (pro se) or through counsel (if retained), hereby files this Complaint against **Defendants Gejing Deng, Yusi Gong, Beth Israel Lahey Deaconess Hospital, The Commonwealth of Massachusetts, [John Doe or Named Local Police Departments], and [John Doe or Named Parents and Relatives]** (collectively, “Defendants”). Plaintiff alleges as follows:

I. INTRODUCTION

1. This action arises from the alleged theft (larceny) of Plaintiff’s property and medications over multiple years, including:

- An M3 Pro MacBook Pro
- 60 prescription controlled substance pills, of which 40 were 20mg Adderall obtained lawfully from a CVS pharmacy

- **Additional ADHD medication (mostly “counterfeit Adderall,” i.e., methamphetamine-based)**, which Plaintiff acknowledges may be **illegal to possess** but asserts is **necessary for him to live a meaningful, productive life** as a software engineer.

2. Plaintiff contends that certain individual Defendants, including **Gejing Deng** and **Yusi Gong**, participated in or facilitated the theft of Plaintiff’s property. Plaintiff further contends that **Beth Israel Lahey Deaconess Hospital** and its Public Safety Officers improperly favored their own personnel (or affiliates) over Plaintiff, thereby failing to adequately safeguard Plaintiff’s property and violating Plaintiff’s rights under state and federal law.

3. **Over the past seven (7) years**, Plaintiff alleges that **the Commonwealth of Massachusetts, local police departments in Massachusetts, and Plaintiff’s own parents/relatives** have repeatedly confiscated, stolen, or otherwise interfered with Plaintiff’s ADHD medication. Some of this medication was lawfully prescribed Adderall, and some was **counterfeit Adderall (methamphetamine)** that Plaintiff obtained **due to his inability to consistently access legitimate prescriptions**. He contends that **the forced removal of these medications severely harmed his mental and physical wellbeing** and **stifled his productivity**.

4. Plaintiff acknowledges that possession of **counterfeit Adderall (methamphetamine)** is typically illegal under state and federal law. However, **Plaintiff challenges the constitutionality of any prohibition** that would effectively deprive him of the **only readily available** medication that **enables him to function** and **contribute to society** as an accomplished software engineer. Plaintiff further argues that **UN treaties** protecting the rights of persons with disabilities, as well as **U.S. Constitutional protections** (particularly for personal autonomy and disability accommodation), must be construed to **prohibit** the government from seizing or criminalizing **Plaintiff’s essential medication** under the circumstances.

5. These alleged thefts and confiscations have **hindered Plaintiff’s ability to function in daily life**, leading to **depression** and severely limiting his capacity to work. **When allowed to take the ADHD medication that helps** (be it authentic prescription or so-called “counterfeit”), Plaintiff can be highly productive and has in fact developed **two iOS apps** (one called “PDFSage”), as well as a **Web Portal**, and **several Android apps**. Plaintiff emphasizes that he **poses no public threat** while on medication unless physically attacked first, in which case he would exercise the right to self-defense (as he would even without medication).

6. Plaintiff seeks **an emergency judicial injunction** under Federal law, Massachusetts law, and **UN treaties** to which the United States is a signatory, **allowing him freedom** to take the medications he knows are effective for his ADHD symptoms, **despite any claimed illegality**. Plaintiff asserts that denying him these medications not only violates **his rights under state and federal law**, but also **contravenes international human rights standards**.

7. Plaintiff has filed Police Report Number 225 with Beth Israel Lahey Deaconess Public Safety. Plaintiff asserts that this police report documents larceny of Plaintiff’s MacBook

Pro and prescription Adderall. Plaintiff underscores that neither possessing a medical degree nor purporting to have medical expertise entitles any individual—including Defendants—to commit theft or otherwise infringe on an individual's rights under Massachusetts or federal law.

8. Plaintiff further alleges that Beth Israel Lahey Deaconess Hospital's Public Safety Department, while publicly funded, showed improper deference to individuals with medical credentials, **in violation of Plaintiff's rights to equal protection** under the Fourteenth Amendment of the U.S. Constitution and related state laws.

9. Plaintiff additionally seeks **a strong judicial injunction** and/or a restraining order—**requiring**:

- The Massachusetts government and law enforcement entities to **cease any interference** with Plaintiff's lawful or necessary possession and usage of ADHD medication (including what Plaintiff describes as "**counterfeit Adderall**").

- Beth Israel Lahey Deaconess Hospital's Public Safety officers and associated personnel to comply with federal law and **the Fourteenth Amendment's Equal Protection** requirements, prohibiting them from favoring medical professionals or any other persons over those who report legitimate theft or other crimes.

II. JURISDICTION AND VENUE

10. **Subject Matter Jurisdiction**: This Court has federal question jurisdiction pursuant to **28 U.S.C. § 1331** because Plaintiff alleges violations of federal constitutional law, including but not limited to the Fourteenth Amendment to the U.S. Constitution. Supplemental jurisdiction over related state law claims exists pursuant to **28 U.S.C. § 1367**.

11. **Personal Jurisdiction**: Defendants are domiciled in, or conduct business in, the Commonwealth of Massachusetts. The alleged conduct and harm occurred in Massachusetts, giving this Court jurisdiction over Defendants.

12. **Venue**: Venue is proper in this district under **28 U.S.C. § 1391**, because the events or omissions giving rise to the claims occurred in this district, and Defendants reside or regularly conduct business here.

III. PARTIES

13. **Plaintiff**:

- **Bo Shang** is a resident of the Commonwealth of Massachusetts (or specify residency), and is the rightful owner of the personal property alleged to have been stolen, as well as the individual whose ADHD medication (both legitimately prescribed and "counterfeit") has allegedly been confiscated or stolen over the past seven years.

14. **Defendant Gejing Deng**:

- Upon information and belief, **Gejing Deng** is Plaintiff's mother. Plaintiff contends that Deng participated in, facilitated, or otherwise caused the theft of Plaintiff's property.

15. **Defendant Yusi Gong:**

- Upon information and belief, **Yusi Gong** is an individual who may also be in the medical field or in some way acted in concert with Deng. Plaintiff contends that Gong aided, abetted, or participated in the alleged theft of Plaintiff's property.

16. **Defendant Beth Israel Lahey Deaconess Hospital:**

- **Beth Israel Lahey Deaconess Hospital** is a hospital corporation or entity operating in the Commonwealth of Massachusetts. Plaintiff contends that the Hospital and its publicly funded Public Safety Department failed to appropriately respond to or investigate the theft, and instead improperly favored or protected its own personnel and affiliates.

17. **Defendant The Commonwealth of Massachusetts:**

- Plaintiff alleges that **the State of Massachusetts** itself, acting through its agencies, officers, and possibly aided by local police departments, played a role in confiscating or otherwise interfering with Plaintiff's possession of both legitimate and counterfeit ADHD medication, thereby exacerbating Plaintiff's ADHD and causing severe mental and emotional distress.

18. **Defendant [John Doe or Named Local Police Departments]:**

- Upon information and belief, various **local police departments** within Massachusetts (to be named more specifically upon further identification) have confiscated or participated in the removal of Plaintiff's ADHD medication over a span of seven years. Plaintiff contends that these actions were unauthorized, discriminatory, and violated both state and federal law.

19. **Defendant [John Doe or Named Parents and Relatives]:**

- Plaintiff alleges that **his parents and certain relatives** have repeatedly taken or destroyed Plaintiff's ADHD medication. Despite the personal relationship, these acts nonetheless constitute theft or tortious interference under the law. Plaintiff further contends that these relatives acted with or were emboldened by certain state actors, compounding the constitutional violations.

IV. FACTUAL ALLEGATIONS

20. On or about the dates set forth in Police Report Number 225, filed with Beth Israel Lahey Deaconess Public Safety, Plaintiff alleges the following:

21. Plaintiff was in possession of an **M3 Pro MacBook Pro**.

22. Plaintiff also possessed **60 prescription controlled substance pills**, lawfully obtained from CVS pharmacy, of which **40 were 20mg Adderall** tablets.

23. Defendants Deng and Gong, acting individually and/or in concert, allegedly took or caused to be taken Plaintiff's MacBook Pro and prescription pills **without consent**.

24. Plaintiff immediately reported this theft to Beth Israel Lahey Deaconess Public Safety and obtained a Police Report (No. 225).

25. Plaintiff alleges that, rather than conducting an **impartial investigation**, representatives from the Beth Israel Lahey Deaconess Public Safety favored or attempted to protect the interests of individuals with medical affiliations over Plaintiff's rights. Plaintiff contends that their actions or omissions violated Plaintiff's **right to Equal Protection** under the Fourteenth Amendment of the U.S. Constitution, the Supremacy Clause, and relevant Massachusetts statutes.

26. The theft of a laptop computer and Adderall prescription constitutes a violation of both Massachusetts state law (e.g., larceny statutes, such as Mass. Gen. Laws ch. 266) and federal law, as applicable. Plaintiff emphasizes that medical professionals or individuals claiming medical knowledge are not above the law, and that theft of property is unequivocally prohibited under Massachusetts state law and the federal criminal code.

27. Plaintiff further alleges that the public safety officers employed by Beth Israel Lahey Deaconess Hospital, who are funded or partially funded by the state, owe duties of neutrality, thorough investigation, and protection to all individuals equally, as mandated by the Fourteenth Amendment to the United States Constitution and related Massachusetts civil rights laws. By favoring certain Defendants with medical connections and refusing to act on Plaintiff's complaints, Plaintiff asserts that the hospital's security personnel violated these constitutional protections.

Allegations of Extended Theft/Interference with ADHD Medication (7-Year Period)

24. For the past **seven (7) years**, Plaintiff contends that:

- **The Commonwealth of Massachusetts** and **various local police departments** have repeatedly seized or destroyed Plaintiff's ADHD medication without due process, thus exacerbating Plaintiff's ADHD and causing severe mental and emotional distress.

- **Parents and relatives** of Plaintiff, in direct collaboration or tacit approval from law enforcement or healthcare providers, have also taken, withheld, or destroyed Plaintiff's medication, sometimes arguing that Plaintiff should not have it, or claiming they knew better about his medical needs.

- These actions left Plaintiff **debilitated, depressed, and nearly unable to function**, causing him to retreat from productive activities and nearly "cease to exist" in everyday life for extended periods.

25. Plaintiff alleges that **once on the proper ADHD medication**—including what is referred to as “**improvised**” or **counterfeit Adderall**—he was able to:

- Develop **two iOS apps**, one being **PDFSage**, a world-class PDF utility featuring OCR editing, bulk processing, machine vision scanning, and more.
- Launch a **Web Portal** and integrated applications that link to PDFSage.
- Build **several Android apps** along the way.
- Contribute positively to society and earn potential revenue from advanced AI features, without posing any public threat whatsoever.

26. Plaintiff acknowledges that **possession of counterfeit Adderall (methamphetamine)** is generally **illegal** under Massachusetts and federal law. However, Plaintiff challenges **the constitutionality of enforcing those prohibitions** under circumstances where he has been **systematically denied** legitimate prescription medication. Plaintiff asserts that denying him **any** ADHD medication that works effectively **violates**:

- **The Fourteenth Amendment** (due process and equal protection)
- **The Americans with Disabilities Act (ADA)** and related statutes
- **Massachusetts civil rights laws**
- **UN treaties** to which the U.S. is a signatory (e.g., international standards for the rights of persons with disabilities).

27. Plaintiff thus **seeks an emergency injunction** to **prevent the confiscation** or criminalization of the ADHD medication he requires, **whether or not** the medication is deemed “counterfeit,” until or unless there is a legitimate and constitutional basis to deny it.

28. Plaintiff underscores that he is **not a danger to himself or others** while on his ADHD medication and that such medication is crucial for him to maintain **a meaningful existence and the ability to engage in software engineering**. Further, **UN treaties** and **international human rights norms** support the principle that persons with disabilities must be granted **reasonable accommodations** and **not deprived** of essential treatments solely based on paternalistic or discriminatory beliefs.

V. CAUSES OF ACTION

COUNT I: LARCENY / CONVERSION (State Law Claims)

29. Plaintiff realleges and incorporates by reference all paragraphs above.

30. Defendants Deng and Gong took, retained, or wrongfully exercised control over Plaintiff’s laptop and prescription medication without consent.

31. As a direct and proximate result, Plaintiff suffered losses including the value of the laptop and the medication.

COUNT II: NEGLIGENCE / NEGLIGENT SUPERVISION (Against Beth Israel Lahey Deaconess Hospital)

32. Plaintiff realleges and incorporates by reference all paragraphs above.

33. Beth Israel Lahey Deaconess Hospital owed Plaintiff a duty of reasonable care, including proper supervision and training of its Public Safety officers.

34. Beth Israel Lahey Deaconess Hospital allegedly failed to properly supervise, train, or manage its officers, resulting in the mishandling of the theft investigation and favoritism toward medically affiliated persons.

COUNT III: VIOLATION OF CIVIL RIGHTS (Fourteenth Amendment Equal Protection) [42 U.S.C. § 1983]

35. Plaintiff realleges and incorporates by reference all paragraphs above.

36. Plaintiff alleges that Beth Israel Lahey Deaconess Public Safety Officers, **and other state actors** (including the State of Massachusetts and certain local police departments), acting under color of law, deprived Plaintiff of the right to **equal protection** when they favored certain individuals (e.g., those with medical backgrounds or familial relationships) over Plaintiff, despite credible theft allegations.

37. Plaintiff is entitled to relief under **42 U.S.C. § 1983** for violations of his constitutional rights.

COUNT IV: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED)

38. Plaintiff realleges and incorporates by reference all paragraphs above.

39. Defendants' conduct, including theft of essential personal property and prescription/counterfeit medication over multiple years, was extreme and outrageous.

40. Plaintiff suffered severe emotional distress as a direct result of Defendants' actions, including significant depression, debilitation, and lost productivity.

COUNT V: VIOLATION OF DISABILITY RIGHTS (Potential ADA and UN Treaties)

41. Plaintiff realleges and incorporates by reference all paragraphs above.

42. Plaintiff has ADHD, which can qualify as a disability under **the Americans with Disabilities Act ("ADA")**. Defendants, including state or local government entities, and individuals acting in concert with them, allegedly interfered with Plaintiff's access to medication necessary to manage this disability.

43. Such interference constitutes a form of discrimination on the basis of disability, violating **Title II of the ADA** and possibly relevant **Massachusetts disability rights laws**.

44. Moreover, to the extent that the U.S. is a signatory to relevant **UN treaties**, Defendants' conduct may also contravene international human rights obligations concerning the treatment and dignity of individuals with disabilities.

COUNT VI: DECLARATORY JUDGMENT / CONSTITUTIONAL CHALLENGE TO CONTROLLED SUBSTANCES ENFORCEMENT (As Applied)

45. Plaintiff realleges and incorporates by reference all paragraphs above.

46. Plaintiff seeks a declaratory judgment that **applying any state or federal criminal statute prohibiting the possession of counterfeit Adderall (methamphetamine)** to Plaintiff's situation, **where lawful prescriptions have been repeatedly withheld or confiscated**, violates Plaintiff's **constitutional rights** (including the Fourteenth Amendment and the right to bodily integrity and medical autonomy), as well as the **ADA** and relevant **UN treaties**.

47. Plaintiff maintains that, **as applied** to him, criminal enforcement of counterfeit medication laws is **unconstitutional** because it deprives him of the **only** effective treatment for his ADHD, effectively punishing him for a condition that requires medication for normal functioning.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff **Bo Shang** respectfully requests the following:

1. **Compensatory Damages** in an amount to be proven at trial, including but not limited to the value of the stolen laptop and prescription medication, any related medical or counseling costs, and compensation for lost productivity or other harm caused by the forced withdrawal from necessary ADHD medication.

2. **Punitive Damages** against Defendants for willful, wanton, and reckless conduct, where applicable by law.

3. **Declaratory Relief** declaring that Defendants' actions violated Plaintiff's state and federal rights, as well as any relevant international human rights standards for the protection of persons with disabilities. **Additionally**, a declaration that **as-applied enforcement** of counterfeit Adderall prohibitions **violates Plaintiff's constitutional and disability rights** under the specific circumstances alleged.

4. **Injunctive Relief / Restraining Order**, compelling Defendants, including:

- **Beth Israel Lahey Deaconess Hospital's Public Safety Department** and any associated persons,

- **The Commonwealth of Massachusetts,**
- **Local Police Departments in Massachusetts,**
- **Plaintiff's parents and relatives,**

to **strictly adhere** to and **enforce** federal law, constitutional protections, and relevant disability rights standards, including but not limited to:

- **Prohibiting** the confiscation of Plaintiff's ADHD medication, **including "counterfeit" medication**, unless authorized by a valid court order that comports with due process and finds a legitimate, non-discriminatory basis for confiscation.
- **Ensuring neutrality** in all investigations, regardless of the professional, familial, or medical status of any individual involved.
- **Mandating compliance** with the Fourteenth Amendment's Equal Protection requirements, ensuring no preferential or discriminatory treatment.
- **Prohibiting** any retaliation against Plaintiff or any complainants who report theft or other alleged criminal activity.
- **Permitting** Plaintiff to continue taking the ADHD medication he deems necessary, **absent a lawful, constitutionally valid prohibition**, so that he can remain productive and avoid severe mental/emotional harm.

5. **Attorneys' Fees and Costs** pursuant to **42 U.S.C. § 1988** or other applicable law, if Plaintiff retains counsel and where allowed.

6. **Any Other Relief** the Court deems just and proper, including but not limited to a judicial injunction or restraining order (such as one from Judge Tong or any other competent judge) that orders Massachusetts authorities to uphold **federal law protections** for victims of theft and to **refrain from showing preferential treatment** to individuals with medical affiliations or familial relationships. This also includes **a directive** that state or local authorities **not** arrest or prosecute Plaintiff **solely for possessing counterfeit ADHD medication** if that medication is necessary to manage Plaintiff's disability and lawfully prescribed medication has been withheld or remains otherwise inaccessible.

VII. DEMAND FOR JURY TRIAL

Plaintiff **demands a trial by jury** on all issues so triable.

DATED: January 16, 2025

Respectfully submitted,

/s/ Bo Shang

(Pro Se or Through Counsel)

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