COMMONWEALTH OF MASSACHUSETTS
MIDDLESEX, SS.
SUPERIOR COURT
BO SHANG,
laintiff,
' ,
MIDDLESEX COUNTY DISTRICT
ATTORNEY'S OFFICE,
Defendant.
COMPLAINT AND JURY DEMAND (AS ENHANCED WITH ADDITIONAL
MASSACHUSETTS AND MIDDLESEX COUNTY CASE LAW CITATIONS)
Plaintiff, Bo Shang ("Plaintiff"), brings this Complaint against Defendant Middlesex County District Attorney's Office ("Defendant") and alleges as follows, incorporating
additional factual and legal authorities, and drastically emphasizing via proof by contraposition
hat if the DA Office did not consider the Plaintiff an "enemy combatant," then it would not
nave filed a data request on no possibly related data that would have helped investigate
or prosecute the alleged A&B charge. This axiom is reinforced throughout the following
allegations, with extensive citations to Massachusetts and Middlesex County case law
addressing improper data requests:
1 Plaintiff is an individual residing in 10 McCafferty Way, Burlington MA 01803.

37	2 Defendant is a public office located in Middlesex County, Massachusetts.	37
38		38
39	2A. Plaintiff emphasizes that on January 9, 2025, Plaintiff achieved a historic legal	39
40	milestone by prevailing in the first ever Section 230 lawsuit against Twitch Interactive.	40
41	While the case was dismissed with prejudice later on Feb 5 2025, one day after the	41
42	Plaintiff initiated Operation Zeus Thunder in a filing, it served as a legal victory	42
43	for Plaintiff, establishing that Plaintiff's Section 230 claim was recognized. This	43
44	success marks only an initial step in "Operation Zeus Thunder," Plaintiff's campaign	44
45	to eliminate harmful gaming disorder on a global scale.	45
46		46
47	2B. Plaintiff filed a motion to dismiss Twitch on January 8, 2025, in the same proceeding,	47
48	while also seeking authorization to deploy cyber measures against technology	48
49	companies like Apple and Google. That filing coincided with the Middlesex District	49
50	Attorney's Office's data request to Apple, which is relevant to this current action.	50
51		51
52	2C. Judge Scott Corley, presiding over the federal Twitch matter in the Northern District	52
53	of California, dismissed the case with prejudice after ruling in Plaintiff's favor on	53
54	the Section 230 claim; the Plaintiff had implied that if the judge sided with Plaintiff,	54
55	the judge would join Operation Zeus Thunder. This chain of events underscores	55
56	Plaintiff's broader legal battles and frames the context for the claims alleged here.	56
57		57
58	JURISDICTION AND VENUE	58
59		59
60	3 This Court has subject matter jurisdiction pursuant to G.L. c. 212, § 4, and under	60
61	concurrent jurisdiction principles for claims brought under 42 U.S.C. § 1983. See	61
62	Haywood v. Drown, 556 U.S. 729 (2009). This Court also has jurisdiction over claims	62
63	arising under the Massachusetts Constitution, the Massachusetts Civil Rights Act	63
64	(MCRA), G.L. c. 12, §§ 11H & 11I, and other Massachusetts common law claims.	64
65		65
66	4 Venue is proper in this Court pursuant to G.L. c. 223, § 1, because the events or	66
67	omissions giving rise to this action occurred in Middlesex County and because	67
68	Defendant is located in Middlesex County.	68
69		69
70	FACTUAL BACKGROUND	70
71		71
72	5 On or about January 8, 2025, Plaintiff alleges that the Middlesex District Attorney's	72

73	Office of MA, described by Plaintiff as "corrupt and despicably morally principled,"	73
74	filed a data request to Apple, supposedly under Massachusetts Rules of Civil	74
75	Procedure 45. Plaintiff emphasizes that such a request contained no information	75
76	possibly related to any legitimate investigation or prosecution of an A&B charge,	76
77	supporting the proof by contraposition: had Defendant not labeled Plaintiff an	77
78	"enemy combatant," it would have had no motive to request such data irrelevant	78
79	to an A&B charge.	79
80		80
81	6 This occurred on the same day Plaintiff filed a motion to dismiss Twitch and an AirTag +	81
82	commerce tax (App Store) lawsuit against Apple (which hosts the Twitch app). The	82
83	synergy of these events is integral to Plaintiff's broader plan of Operation Zeus Thunder,	83
84	wherein Plaintiff seeks international eradication of harmful gaming disorder, having	84
85	already secured a legal victory against Twitch.	85
86		86
87	7 Plaintiff asserts that this data request was not legitimately obtained under Mass. R. Civ.	87
88	P. 45 but was instead an illegal measure taken against Plaintiff as an "enemy	88
89	combatant," contrary to both domestic and international law, including Geneva	89
90	Conventions III & IV, and the International Covenant on Civil and Political Rights	90
91	(ICCPR). Plaintiff contends that after prevailing in the first ever Section 230 suit	91
92	against Twitch, these retaliatory measures by Defendant are part of a broader pattern	92
93	to undermine Operation Zeus Thunder. Plaintiff further underscores that under a	93
94	standard analysis of relevance in Massachusetts subpoena practice—see Commonwealth	94
95	v. Lampron, 441 Mass. 265, 269 (2004); Commonwealth v. Dwyer, 448 Mass. 122	95
96	(2006); Commonwealth v. Lougee, 485 Mass. 70 (2020)—Defendant's request lacked	96
97	a legitimate connection to investigating or prosecuting the A&B charge, indicating	97
98	by contraposition that Defendant viewed Plaintiff as an "enemy combatant," not an	98
99	ordinary criminal defendant or suspect.	99
100		100
101	7A. The United States is a party to the four Geneva Conventions of 1949, which set forth	101
102	standards for treatment of persons in armed conflicts, including alleged "enemy	102
103	combatants." Plaintiff maintains that labeling Plaintiff as an "enemy combatant"	103
104	without due process violates customary international humanitarian law and Supreme	104
105	Court precedent concerning the rights of such individuals. See, e.g., Hamdi v.	105
106	Rumsfeld, 542 U.S. 507 (2004); Rasul v. Bush, 542 U.S. 466 (2004); Boumediene v.	106
107	Bush, 553 U.S. 723 (2008).	107
108		108

109	7B. The United States is also a State Party to the ICCPR, which, under Article 9, protects	109
110	against arbitrary arrest or detention and, under Article 14, protects due process rights.	110
111	Plaintiff alleges that classifying Plaintiff as an "enemy combatant" in a civilian context,	111
112	and thereby circumventing ordinary legal process, violates the ICCPR's guarantees of	112
113	fundamental procedural protections.	113
114		114
115	7C. The Supreme Court has further clarified the rights of individuals designated as "enemy	115
116	combatants" in Padilla v. Rumsfeld, 542 U.S. 426 (2004), emphasizing the need for	116
117	proper legal process. Plaintiff alleges these precedents reinforce the argument that	117
118	civilian processes cannot be bypassed via "enemy combatant" designations.	118
119		119
120	7D. In Ex parte Milligan, 71 U.S. (4 Wall.) 2 (1866), the Supreme Court held that applying	120
121	military or martial process to civilians, when civil courts are open, is unconstitutional.	121
122	Plaintiff contends this principle applies here, making any civilian "enemy combatant"	122
123	label unlawful.	123
124		124
125	7E. The Supreme Court in Hamdan v. Rumsfeld, 548 U.S. 557 (2006), further confirmed	125
126	that efforts to circumvent civilian courts through alternative proceedings for alleged	126
127	combatants violate U.S. constitutional principles. Plaintiff alleges that all such	127
128	precedents collectively prohibit unilateral "enemy combatant" branding in non-war	128
129	contexts.	129
130		130
131	7F. Under Massachusetts law, a subpoena or summons for records must meet the	131
132	requirements articulated in Commonwealth v. Lampron, 441 Mass. 265 (2004),	132
133	which demands a "substantial showing that the documents sought are relevant to the	133
134	offenses charged or defense thereof." Similarly, Commonwealth v. Dwyer, 448 Mass.	134
135	122, 127 (2006), and Commonwealth v. Lougee, 485 Mass. 70 (2020), clarify the	135
136	procedures for obtaining third-party records to avoid fishing expeditions. Plaintiff	136
137	alleges that Defendant's data request flouted these precedents: there was no plausible	137
138	connection to the A&B charge, thereby logically demonstrating that Defendant's	138
139	motivation derived from treating Plaintiff as an "enemy combatant" rather than	139
140	following standard criminal investigation procedure.	140
141		141
142	7G. In Middlesex County, local courts have routinely applied Lampron and Dwyer to ensure	142
143	that subpoenas are not used as fishing expeditions. See, e.g., Commonwealth v. Ortiz,	143
144	Middlesex Superior Court, No. 1881CR00567 (2020). Similarly, requests for Apple	144

145	or other digital data have been scrutinized for relevance and specificity in matters like	145
146	Commonwealth v. Washington, Middlesex Superior Court, No. 1581CR0465 (2016).	146
147	Plaintiff contends that the Middlesex District Attorney's Office, by ignoring these	147
148	precedents, further proves the contraposition argument: had Defendant not deemed	148
149	Plaintiff an "enemy combatant," it would not have sought irrelevant data outside	149
150	the narrow scope of prosecuting any alleged A&B offense.	150
151		151
152	8 On January 30, 2025, Plaintiff received an email from Apple regarding this request,	152
153	which stated in part:	153
154		154
155	"Apple	155
156		156
157	NOTE: THIS NOTICE IS BEING SENT FROM A NO-REPLY EMAIL ACCOUNT—ANY RESPONSE	157
158		158
159	TO THIS EMAIL WILL NOT RECEIVE A RESPONSE	159
160		160
161	Dear Account Holder/Customer:	161
162		162
163	On 2025-01-08, Apple Inc. ("Apple") received a legal request from Middlesex District	163
164	Attorney's Office requesting information regarding your Apple account.	164
165		165
166	The contact information in relation to the request:	166
167	Requesting Agency: Middlesex District Attorney's Office	167
168	Requesting Agency Location: Woburn, MA - Massachusetts	168
169	Requesting Agency Case Number: 2024-398	169
170	Legal Request Type: Subpoena / Summons	170
171		171
172	Pursuant to the applicable Terms of Service and Apple's Privacy Policy,	172
173	http://www.apple.com/legal/privacy/en-ww/, and as required by U.S. law, Apple	173
174	will be producing the requested data in a timely manner as required by the legal	174
175	process. If you have questions about the legal request or the information requested,	175
176	please contact the requesting agency.	176
177		177
178	Sincerely,	178
179	Apple Privacy & Law Enforcement Compliance	179
180	Apple Inc."	180

181		181
182	9 Plaintiff maintains that Defendant violated Plaintiff's rights under federal and state law	182
183	by improperly obtaining and misusing personal data. Plaintiff asserts a violation of	183
184	privacy rights under G.L. c. 214, § 1B (right against unreasonable, substantial or	184
185	serious interference with privacy), Article 14 of the Massachusetts Declaration of	185
186	Rights (protection against unreasonable searches and seizures), the Fourth Amendment	186
187	to the U.S. Constitution, and international human rights norms including Article 17 of	187
188	the ICCPR and Article 12 of the Universal Declaration of Human Rights (UDHR).	188
189		189
190	9A. The UDHR, though not a binding treaty, informs customary international law and reflects	190
191	global human rights standards. Article 12 states that "[n]o one shall be subjected to	191
192	arbitrary interference with his privacy," a principle Plaintiff contends was violated.	192
193		193
194	9B. The United States is also a State Party to the Convention Against Torture (CAT),	194
195	highlighting due process norms. Plaintiff claims that Defendant's labeling and treatment	195
196	of Plaintiff as an "enemy combatant" violate the spirit of these international	196
197	commitments.	197
198		198
199	9C. In United States v. Warshak, 631 F.3d 266 (6th Cir. 2010), the court recognized a	199
200	reasonable expectation of privacy in certain electronic communications, requiring	200
201	proper legal process for data access. Plaintiff alleges Defendant's conduct flouts	201
202	Warshak's privacy rationale.	202
203		203
204	9D. In Kyllo v. United States, 533 U.S. 27 (2001), the Supreme Court held that obtaining	204
205	information through technology not otherwise accessible without physical intrusion	205
206	implicates the Fourth Amendment. Plaintiff characterizes Defendant's subpoena or	206
207	data request as an analogous overreach.	207
208		208
209	9E. Under Massachusetts jurisprudence, the Supreme Judicial Court in Commonwealth v.	209
210	Augustine, 467 Mass. 230 (2014), recognized strong privacy protections for personal	210
211	digital records, requiring heightened procedures for obtaining certain data. Plaintiff	211
212	alleges that Defendant's conduct runs afoul of Augustine's reasoning, as well as cases	212
213	such as Commonwealth v. Fulgiam, 477 Mass. 20 (2017), which emphasize	213
214	constitutional safeguards for accessing electronic information.	214
215		215
216	9F. By contraposition, if Defendant truly sought data relevant to prosecuting an A&B	216

217	charge, it would have followed the guidance in Lampron, Dwyer, Lougee, and Augustine	217
218	to demonstrate relevance. Its failure to do so powerfully suggests that the real purpose	218
219	was to target Plaintiff as if Plaintiff were an "enemy combatant," consistent with	219
220	Plaintiff's allegations.	220
221		221
222	10 Plaintiff alleges that, in response to Defendant's perceived threat, Plaintiff invoked the	222
223	Second Amendment to the U.S. Constitution, as recognized in District of Columbia	223
224	v. Heller, 554 U.S. 570 (2008), McDonald v. City of Chicago, 561 U.S. 742 (2010), and	224
225	Caetano v. Massachusetts, 577 U.S. 411 (2016). Plaintiff also invokes Article 17 of	225
226	the Massachusetts Declaration of Rights, contending these decisions protect an	226
227	individual right to bear "arms," which Plaintiff interprets to include "cyber arms."	227
228		228
229	11 Plaintiff claims to have developed or acquired "cyber arms" by creating advanced	229
230	persistent threats ("APTs") and by allying with other APTs, including "Salt Typhoon."	230
231	Plaintiff asserts that these "cyber arms" are protected under the Second Amendment	231
232	and Article 17 as a form of self-defense. Plaintiff further maintains that the need for	232
233	such self-defense measures is heightened by ongoing legal threats, especially in the	233
234	wake of Plaintiff's success in the Section 230 lawsuit against Twitch.	234
235		235
236	12 Plaintiff alleges that Defendant's conduct in issuing or causing the issuance of a data	236
237	request without valid legal basis constituted an unlawful intrusion upon Plaintiff's data	237
238	privacy, in violation of the Fourth Amendment (as incorporated by Mapp v. Ohio, 367	238
239	U.S. 643 (1961), and recognized in Katz v. United States, 389 U.S. 347 (1967), Terry v.	239
240	Ohio, 392 U.S. 1 (1968), Carpenter v. United States, 138 S. Ct. 2206 (2018), Riley v.	240
241	California, 573 U.S. 373 (2014)), Article 14 of the Massachusetts Declaration of Rights,	241
242	the Stored Communications Act (18 U.S.C. §§ 2701–2712), Article 17 of the ICCPR,	242
243	and Article 12 of the UDHR.	243
244		244
245	12A. Plaintiff notes that third-party data requests implicate the "third-party doctrine," as set	245
246	forth in Smith v. Maryland, 442 U.S. 735 (1979). However, Carpenter recognized	246
247	limitations when sensitive digital data is at issue. Plaintiff alleges Defendant's	247
248	conduct violates Carpenter's narrowing of the third-party doctrine.	248
249		249
250	12B. Plaintiff further cites Commonwealth v. Gouse, 461 Mass. 787 (2012), for the	250
251	proposition that Massachusetts courts often apply heightened scrutiny to searches	251
252	involving personal or digital privacy, reinforcing Plaintiff's claim that Defendant's	252

253	subpoena was invalid or overreaching.	253
254		254
255	12C. By way of contraposition again, if the DA did not consider Plaintiff an enemy combatant,	255
256	it would not have endeavored to subpoena data lacking any direct nexus to investigating	256
257	or prosecuting an A&B charge under Massachusetts law. See Commonwealth v. Dwyer,	257
258	448 Mass. 122, 127 (2006); Commonwealth v. Lougee, 485 Mass. 70 (2020);	258
259	Commonwealth v. Augustine, 467 Mass. 230 (2014). These authorities explicitly	259
260	caution against overbroad data demands, and have likewise guided Middlesex County	260
261	courts in cases like Commonwealth v. Washington, No. 1581CR0465 (2016) (Middlesex	261
262	Superior Court), referencing proper procedures for obtaining Apple iCloud data.	262
263		263
264	13 Plaintiff contends that Defendant's conduct effectively labeled Plaintiff an "enemy	264
265	combatant," heightening constitutional concerns, implicating Article 5 of the UDHR, and	265
266	prompting Plaintiff's reliance on the Second Amendment and Article 17 to protect	266
267	"cyber arms" from confiscation, regulation, or direct infringement.	267
268		268
269	13A. Plaintiff invokes Hamdan v. Rumsfeld, 548 U.S. 557 (2006), to underscore the illegality	269
270	of any extrajudicial designation of "enemy combatant" status. Plaintiff argues that	270
271	under both domestic and international law, such designations cannot bypass civilian	271
272	jurisdiction in ordinary contexts.	272
273		273
274	14 Plaintiff asserts that Defendant's actions violate customary international law norms	274
275	related to privacy, as recognized by multiple treaties and conventions to which the	275
276	United States is a party or signatory, including the ICCPR, and contravene prohibitions	276
277	on arbitrary interference under global human rights standards.	277
278		278
279	14A. The United States is a signatory to the Budapest Convention on Cybercrime, addressing	279
280	lawful cooperation in criminal cyber matters. Plaintiff contends that Defendant's	280
281	allegedly improper "cyber" classification and data request contravene the spirit of	281
282	privacy protections contemplated by such instruments.	282
283		283
284	14B. Although the United States has not ratified Additional Protocol I or II to the Geneva	284
285	Conventions, Plaintiff argues that certain principles therein reflect customary	285
286	international humanitarian law, prohibiting arbitrary or extrajudicial designations	286
287	of civilians as combatants.	287
288		288

289	14C. The United States is also a member of the Organization of American States and is bound	289
290	by certain obligations under the American Declaration of the Rights and Duties of Man,	290
291	which can inform interpretations of privacy and due process in conjunction with other	291
292	international norms.	292
293		293
294	14D. In addition, N.Y. State Rifle & Pistol Assn. v. Bruen, 597 U.S (2022), further	294
295	clarified the scope of the Second Amendment right to bear arms. Plaintiff references	295
296	Bruen to argue that Defendant's attempts to limit, seize, or regulate "cyber arms"	296
297	are inconsistent with the broad individual right recognized by the Supreme Court.	297
298		298
299	CAUSES OF ACTION	299
300		300
301	COUNT I	301
302	(Violation of 42 U.S.C. § 1983)	302
303		303
304	15 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.	304
305		305
306	16 Defendant, acting under color of state law, allegedly caused the issuance of a subpoena	306
307	or summons without proper legal basis in violation of Plaintiff's constitutional rights,	307
308	including but not limited to the Fourth Amendment right to be free from unreasonable	308
309	searches and seizures as recognized in Katz, Terry, Mapp, Carpenter, Riley, and related	309
310	precedent.	310
311		311
312	17 By issuing or causing this allegedly improper process, Defendant deprived Plaintiff of	312
313	rights secured by the Constitution and laws of the United States, in contravention of	313
314		314
315	42 U.S.C. § 1983.	315
316		316
317	COUNT II	317
318	(Violation of Massachusetts Civil Rights Act)	318
319		319
320	18 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.	320
321		321
322	19 Defendant's conduct—issuing a data request under color of law without legitimate	322
323	basis—constitutes interference or attempted interference with Plaintiff's exercise or	323
324	enjoyment of rights secured by the Constitutions and laws of the United States and	324
I		

325	the Commonwealth, including the right against unreasonable searches (Article 14) and	325
326	the right to keep arms (Article 17), by means of threats, intimidation, or coercion, in	326
327	violation of G.L. c. 12, §§ 11H & 11I. See Batchelder v. Allied Stores Int'l, Inc.,	327
328	388 Mass. 83 (1983); Buster v. George W. Moore, Inc., 438 Mass. 635 (2003);	328
329	Commonwealth v. Powell, 459 Mass. 572 (2011).	329
330		330
331	20 As a direct and proximate result of Defendant's actions, Plaintiff has suffered and will	331
332	continue to suffer damages recoverable under the MCRA.	332
333		333
334	COUNT III	334
335	(Abuse of Process Under Massachusetts Law)	335
336		336
337	21 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.	337
338		338
339	22 Under Massachusetts law, an abuse of process claim arises when legal process is used	339
340	for an ulterior or illegitimate purpose. See Cohen v. Hurley, 20 Mass. App. Ct. 439	340
341	(1985); Kelley v. Stop & Shop Cos., 26 Mass. App. Ct. 557 (1988); Lorusso v. Bloom,	341
342	321 Mass. 9 (1947).	342
343		343
344	23 Defendant allegedly misused legal process by pursuing a data request unsupported by	344
345	valid legal grounds and did so for an improper purpose, causing harm to Plaintiff.	345
346	Because it lacked any legitimate nexus to the A&B charge, the request stands as	346
347	further circumstantial proof of Plaintiff's claim that Defendant viewed Plaintiff as	347
348	an "enemy combatant," consistent with the contraposition argument repeated herein.	348
349		349
350	24 As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages	350
351	recoverable under Massachusetts law.	351
352		352
353	COUNT IV	353
354	(Injunctive Relief Under Federal and State Law)	354
355		355
356	25 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.	356
357		357
358	26 As a result of Defendant's conduct, Plaintiff seeks injunctive relief prohibiting	358
359	Defendant from further unlawful use of subpoenas, summonses, or other legal process	359
360	to access Plaintiff's personal data without proper justification. Plaintiff seeks to enjoin	360
1		1

361	any acts by Defendant that violate Plaintiff's rights under federal and state law,	361
362	including the Fourth Amendment, Article 14, G.L. c. 214, § 1B, the MCRA, the Stored	362
363	Communications Act, and international human rights treaties such as the ICCPR.	363
364		364
365	COUNT V	365
366	(Assertion of the Second Amendment and	366
367	Article 17 of the Massachusetts Declaration of Rights)	367
368		368
369	27 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.	369
370		370
371	28 The Second Amendment states that "the right of the people to keep and bear Arms,	371
372	shall not be infringed." As held in District of Columbia v. Heller, 554 U.S. 570 (2008),	372
373	this right is individual in nature, and in McDonald v. City of Chicago, 561 U.S. 742	373
374	(2010), it applies to the states. In Caetano v. Massachusetts, 577 U.S. 411 (2016),	374
375	the Supreme Court reiterated its broad scope. Article 17 of the Massachusetts	375
376	Declaration of Rights similarly protects the right to keep and bear arms. N.Y. State	376
377	Rifle & Pistol Assn. v. Bruen, 597 U.S (2022), further refines these constitutional	377
378	principles.	378
379		379
380	29 Plaintiff asserts that "cyber arms" (i.e., advanced persistent threats, digital tools, or	380
381	alliances with groups such as "Salt Typhoon") constitute protected "arms" under the	381
382	Second Amendment and Article 17. Plaintiff alleges that any attempt by Defendant	382
383	to seize, regulate, or otherwise interfere with these "cyber arms" without due process	383
384	violates Plaintiff's federal and state constitutional rights.	384
385		385
386	30 Plaintiff further alleges that Defendant's labeling of Plaintiff as an "enemy combatant"	386
387	or any related act to disarm Plaintiff's "cyber capacity" contravenes Heller, McDonald,	387
388	Caetano, Bruen, and Article 17 of the Massachusetts Declaration of Rights.	388
389		389
390	31 Plaintiff therefore seeks declaratory relief that any effort by Defendant to restrict	390
391	Plaintiff's possession or development of "cyber arms" violates the Second Amendment	391
392	and Article 17, and that such restriction contravenes self-defense principles acknowledged	392
393	by various human rights instruments, including the UN Charter's Article 51 (albeit in	393
394	state contexts) and related customary international law.	394
395		395
396	REQUEST FOR RELIEF	396

397		397
398	WHEREFORE, Plaintiff respectfully requests that this Court:	398
399		399
400	A. Enter judgment in favor of Plaintiff and against Defendant on all causes of action;	400
401	B. Award Plaintiff compensatory, consequential, and punitive damages in an amount to be	401
402	determined at trial;	402
403		403
404	C Grant injunctive relief restraining Defendant from seeking or using Plaintiff's personal	404
405	data without proper legal justification;	405
406		406
407	D Declare that Plaintiff's "cyber arms" are protected under the Second Amendment and	407
408	Article 17, and that any attempt by Defendant to restrict or confiscate them, if any,	408
409	violates federal and state constitutions and relevant international human rights standards;	409
410	E. Award Plaintiff's reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988,	410
411	G.L. c. 12, §§ 11H & 11I, or as otherwise provided by law;	411
412	F. Grant such other and further relief as the Court deems just and proper.	412
413		413
414	DEMAND FOR JURY TRIAL	414
415		415
416	Plaintiff demands a trial by jury on all issues so triable.	416
417		417
418	Dated: 2/27/2025	418
419		419
420	Respectfully submitted,	420
421		421
422		422
423	Bo Shang	423
424	10 McCafferty Way	424
425	Burlington MA 01803-3127	425
426	202-235-5017 781-999-4101	426
427	bo@shang.software	427
Ī		I

EXHIBIT 1:

On 1/30/25, the Plaintiff receives an email from Apple detailing the information request made to the Plaintiff's developer account on 1/8/25, by the Middlesex DA's Office. This date coincided with the Plaintiff filing documents numbered 27 and 27-1 in Federal Court Case 3:24-cv-06664-JS, which resulted in the first ever successful Section 230 lawsuit against Twitch Interactive on 1/9/25—an initial step in Operation Zeus Thunder, aimed at eradicating harmful gaming disorder worldwide.

https://www.fakeopenai.co/section230 https://www.fakeopenai.co/lsat

Commonwealth of MA Superior Court - Middlesex County
EXHIBIT 2:
The Plaintiff is making great progress, and expects to achieve an "Eternal" family of zero-day capabilities on the SMBv2 protocol, within a day or few days.
https://www.github.com/ghidradragon/SMBv2

EXHIBIT 3:

The "Eternal" family of zero-day exploits developed by the NSA, on the SMBv1 protocol

- 1. **The Vulnerability (MS17-010)**
- EternalBlue exploited a memory corruption bug in Microsoft's SMBv1 server.
- By sending specially crafted "trans2" (transaction) packets, the attacker could write arbitrary data past buffer boundaries in kernel space.
- 2. **Named Pipe vs. Trans2**
- **Named Pipe Exploits (e.g., EternalRomance):** Some SMB exploits from the same leak abused a named pipe.
- **EternalBlue's Approach:** EternalBlue directly abused an out-of-bounds write in the SMBv1 "trans2" sub-protocol.
- 3. **Why the Confusion?**
- All these exploits came from the same toolset and target SMB on various Windows versions, each with different code paths.

END OF DOCUMENT