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<b>MIDDLESEX COUNTY DISTRICT</b>	<b>1:15</b>
<b>ATTORNEY'S OFFICE,</b>	<b>1:17</b>
<b>COMPLAINT AND JURY DEMAND (AS ENHANCED)</b>	<b>1:22</b>
1 Plaintiff is an individual residing in 10 McCafferty Way, Burlington MA 01803.	1:28
2 Defendant is a public office located in Middlesex County, Massachusetts.	1:30
<b>JURISDICTION AND VENUE</b>	<b>1:32</b>
3 This Court has subject matter jurisdiction pursuant to G.L. c. 212, § 4, and under	1:34
4 Venue is proper in this Court pursuant to G.L. c. 223, § 1, because the events or	2:40
<b>FACTUAL BACKGROUND</b>	<b>2:44</b>
5 On or about January 8, 2025, Plaintiff alleges that the Middlesex District Attorney's	2:46
6 This occurred on the same day Plaintiff filed a motion to dismiss Twitch and an AirTag +	2:51
7 Plaintiff asserts that this data request was not legitimately obtained under Mass. R. Civ. (ICCPR).	2:54
8 On January 30, 2025, Plaintiff received an email from Apple regarding this request,	2:59
<b>NOTE: THIS NOTICE IS BEING SENT FROM A NO-REPLY EMAIL ACCOUNT—ANY</b>	<b>3:91</b>
<b>RESPONSE</b>	<b>3:96</b>
<b>TO THIS EMAIL WILL NOT RECEIVE A RESPONSE</b>	<b>3:98</b>
9 Plaintiff maintains that Defendant violated Plaintiff's rights under federal and state law	4:121
10 Plaintiff alleges that, in response to Defendant's perceived threat, Plaintiff invoked the	5:153
11 Plaintiff claims to have developed or acquired "cyber arms" by creating advanced	5:160
12 Plaintiff alleges that Defendant's conduct in issuing or causing the issuance of a data	5:165
13 Plaintiff contends that Defendant's conduct effectively labeled Plaintiff an "enemy	6:184
14 Plaintiff asserts that Defendant's actions violate customary international law norms	6:194
<b>CAUSES OF ACTION</b>	<b>7:219</b>
<b>COUNT I</b>	<b>7:221</b>
15 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.	7:224
16 Defendant, acting under color of state law, allegedly caused the issuance of a	7:226

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subpoena	
17 By issuing or causing this allegedly improper process, Defendant deprived Plaintiff of	7:232
42 U.S.C. § 1983.	7:235
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19 Defendant's conduct—issuing a data request under color of law without legitimate	7:242
20 As a direct and proximate result of Defendant's actions, Plaintiff has suffered and will	7:251
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21 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth	8:257
herein.	
22 Under Massachusetts law, an abuse of process claim arises when legal process is used	8:259
23 Defendant allegedly misused legal process by pursuing a data request unsupported by	8:264
24 As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages	8:267
COUNT IV	8:270
25 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth	8:273
herein.	
26 As a result of Defendant's conduct, Plaintiff seeks injunctive relief prohibiting	8:275
COUNT V	8:282
27 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth	8:286
herein.	
28 The Second Amendment states that “the right of the people to keep and bear Arms,	8:288
29 Plaintiff asserts that “cyber arms” (i.e., advanced persistent threats, digital tools, or	9:297
30 Plaintiff further alleges that Defendant's labeling of Plaintiff as an “enemy combatant”	9:303
31 Plaintiff therefore seeks declaratory relief that any effort by Defendant to restrict	9:307
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C Grant injunctive relief restraining Defendant from seeking or using Plaintiff's personal	9:321
D Declare that Plaintiff's “cyber arms” are protected under the Second Amendment and	9:324
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<b>// 3. SMB2 NEGOTIATE</b>	<b>32:1118</b>
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<b>2 **Named Pipe vs. Trans2**</b>	<b>34:1208</b>
<b>3 **Why the Confusion?**</b>	<b>34:1216</b>

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 27 and 27-1 in Federal Court Case 3:24-cv-06664-JS, the first time ever anyone has won a Section 230 claim vs Twitch interactive. 36:1