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ATTORNEY'S OFFICE,	1:17
COMPLAINT AND JURY DEMAND (AS ENHANCED)	1:22
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
JURISDICTION AND VENUE	1:32
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
FACTUAL BACKGROUND	2:44
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
NOTE: THIS NOTICE IS BEING SENT FROM A NO-REPLY EMAIL ACCOUNT—ANY	3:91
RESPONSE	3:96
TO THIS EMAIL WILL NOT RECEIVE A RESPONSE	3:98
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
CAUSES OF ACTION	7:219
COUNT I	7:221
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
COUNT II	7:237
18 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth	7:240
herein.	
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
COUNT III	8:254
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
REQUEST FOR RELIEF	9:313
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
DEMAND FOR JURY TRIAL	10:331
1 **The Vulnerability (MS17-010)**	12:417
2 **Named Pipe vs. Trans2**	12:423
3 **Why the Confusion?**	12:431