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| **MIDDLESEX COUNTY DISTRICT** | 1:15 |
| **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.** | 2:54 |
| **(ICCPR).** | 2:59 |
| **8 On January 30, 2025, Plaintiff received an email from Apple regarding this request,** | 3:91 |
| **NOTE: THIS NOTICE IS BEING SENT FROM A NO-REPLY EMAIL ACCOUNT—ANY 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 subpoena** | 7:226 |
| **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 herein.** | 7:240 |
| **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 herein.** | 8:257 |
| **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 herein.** | 8:273 |
| **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 herein.** | 8:286 |
| **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 |