**PDFSage Inc. | 2581CV00524 Shang, Bo vs. Middlesex County DA Office  
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| **MIDDLESEX COUNTY DISTRICT** | 1:15 |
| **ATTORNEY’S OFFICE,** | 1:17 |
| **COMPLAINT AND JURY DEMAND (AS ENHANCED WITH ADDITIONAL** | 1:22 |
| **MASSACHUSETTS AND MIDDLESEX COUNTY CASE LAW CITATIONS)** | 1:24 |
| **1 Plaintiff is an individual residing in 10 McCafferty Way, Burlington MA 01803.** | 1:35 |
| **2 Defendant is a public office located in Middlesex County, Massachusetts.** | 2:37 |
| **JURISDICTION AND VENUE** | 2:58 |
| **3 This Court has subject matter jurisdiction pursuant to G.L. c. 212, § 4, and under** | 2:60 |
| **4 Venue is proper in this Court pursuant to G.L. c. 223, § 1, because the events or** | 2:66 |
| **FACTUAL BACKGROUND** | 2:70 |
| **5 On or about January 8, 2025, Plaintiff alleges that the Middlesex District Attorney’s** | 2:72 |
| **6 This occurred on the same day Plaintiff filed a motion to dismiss Twitch and an AirTag +** | 3:81 |
| **7 Plaintiff asserts that this data request was not legitimately obtained under Mass. R. Civ.** | 3:87 |
| **8 On January 30, 2025, Plaintiff received an email from Apple regarding this request,** | 5:158 |
| **NOTE: THIS NOTICE IS BEING SENT FROM A NO-REPLY EMAIL ACCOUNT—ANY RESPONSE** | 5:163 |
| **TO THIS EMAIL WILL NOT RECEIVE A RESPONSE** | 5:165 |
| **9 Plaintiff maintains that Defendant violated Plaintiff’s rights under federal and state law** | 6:188 |
| **10 Plaintiff alleges that, in response to Defendant’s perceived threat, Plaintiff invoked the** | 7:228 |
| **11 Plaintiff claims to have developed or acquired “cyber arms” by creating advanced** | 7:235 |
| **12 Plaintiff alleges that Defendant’s conduct in issuing or causing the issuance of a data** | 7:242 |
| **13 Plaintiff contends that Defendant’s conduct effectively labeled Plaintiff an “enemy** | 8:273 |
| **14 Plaintiff asserts that Defendant’s actions violate customary international law norms** | 8:283 |
| **CAUSES OF ACTION** | 9:308 |
| **COUNT I** | 9:310 |
| **15 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.** | 9:313 |
| **16 Defendant, acting under color of state law, allegedly caused the issuance of a subpoena** | 9:315 |
| **17 By issuing or causing this allegedly improper process, Defendant deprived Plaintiff of** | 9:321 |
| **42 U.S.C. § 1983.** | 9:324 |
| **COUNT II** | 10:326 |
| **18 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.** | 10:329 |
| **19 Defendant’s conduct—issuing a data request under color of law without legitimate** | 10:331 |
| **20 As a direct and proximate result of Defendant’s actions, Plaintiff has suffered and will** | 10:340 |
| **COUNT III** | 10:343 |
| **21 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.** | 10:346 |
| **22 Under Massachusetts law, an abuse of process claim arises when legal process is used** | 10:348 |
| **23 Defendant allegedly misused legal process by pursuing a data request unsupported by** | 10:353 |
| **24 As a direct and proximate result of Defendant’s actions, Plaintiff has suffered damages** | 10:359 |
| **COUNT IV** | 11:362 |
| **25 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.** | 11:365 |
| **26 As a result of Defendant’s conduct, Plaintiff seeks injunctive relief prohibiting** | 11:367 |
| **COUNT V** | 11:374 |
| **27 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein.** | 11:378 |
| **28 The Second Amendment states that “the right of the people to keep and bear Arms,** | 11:380 |
| **29 Plaintiff asserts that “cyber arms” (i.e., advanced persistent threats, digital tools, or** | 11:389 |
| **30 Plaintiff further alleges that Defendant’s labeling of Plaintiff as an “enemy combatant”** | 11:395 |
| **31 Plaintiff therefore seeks declaratory relief that any effort by Defendant to restrict** | 12:399 |
| **REQUEST FOR RELIEF** | 12:405 |
| **C Grant injunctive relief restraining Defendant from seeking or using Plaintiff’s personal** | 12:413 |
| **D Declare that Plaintiff’s “cyber arms” are protected under the Second Amendment and** | 12:416 |
| **DEMAND FOR JURY TRIAL** | 12:423 |