

# UNITED STATES DISTRICT COURT

For the District of Massachusetts

## Plaintiff:

**Bo Shang**

**v.**

## Defendants:

1. **Gejing Deng**
2. **Yusi Gong**
3. **Beth Israel Lahey Deaconess Hospital**
4. **The Commonwealth of Massachusetts**
5. **Beth Israel Lahey Deaconess Hospital Public Safety**
6. **Burlington MA Police Department**

Case No.: \_\_\_\_\_

## JURY TRIAL DEMANDED

## COMPLAINT

**Plaintiff Bo Shang** ("Plaintiff"), by and through himself (pro se) or through counsel (if retained), hereby files this Complaint against **Defendants Gejing Deng, Yusi Gong, Beth Israel Lahey Deaconess Hospital, The Commonwealth of Massachusetts, Beth Israel Lahey Deaconess Hospital Public Safety, and Burlington MA Police Department** (collectively, "Defendants"). Plaintiff alleges as follows:

## I. INTRODUCTION

1. This action arises from the alleged theft (larceny) of Plaintiff's property and medications over multiple years, including:

- An M3 Pro MacBook Pro
- 60 prescription controlled substance pills, of which 40 were 20mg Adderall obtained lawfully from a CVS pharmacy

- **Additional ADHD medication (mostly “counterfeit Adderall,” i.e., methamphetamine-based)**, which Plaintiff acknowledges may be **illegal to possess** but asserts is **necessary for him to live a meaningful, productive life** as a software engineer.

2. Plaintiff contends that certain individual Defendants, including **Gejing Deng** and **Yusi Gong**, participated in or facilitated the theft of Plaintiff’s property. Plaintiff further contends that **Beth Israel Lahey Deaconess Hospital** and its Public Safety Officers improperly favored their own personnel (or affiliates) over Plaintiff, thereby failing to adequately safeguard Plaintiff’s property and violating Plaintiff’s rights under state and federal law.

3. **Over the past seven (7) years**, Plaintiff alleges that **the Commonwealth of Massachusetts, local police departments in Massachusetts, and Plaintiff’s own parents/relatives** have repeatedly confiscated, stolen, or otherwise interfered with Plaintiff’s ADHD medication. Some of this medication was lawfully prescribed Adderall, and some was **counterfeit Adderall (methamphetamine)** that Plaintiff obtained **due to his inability to consistently access legitimate prescriptions**. He contends that **the forced removal of these medications severely harmed his mental and physical wellbeing** and **stifled his productivity**.

4. Plaintiff acknowledges that possession of **counterfeit Adderall (methamphetamine)** is typically illegal under state and federal law. However, **Plaintiff challenges the constitutionality of any prohibition** that would effectively deprive him of the **only readily available** medication that **enables him to function** and **contribute to society** as an accomplished software engineer. Plaintiff further argues that **UN treaties** protecting the rights of persons with disabilities, as well as **U.S. Constitutional protections** (particularly for personal autonomy and disability accommodation), must be construed to **prohibit** the government from seizing or criminalizing **Plaintiff’s essential medication** under the circumstances.

5. These alleged thefts and confiscations have **hindered Plaintiff’s ability to function in daily life**, leading to **depression** and severely limiting his capacity to work. **When allowed to take the ADHD medication that helps** (be it authentic prescription or so-called “counterfeit”), Plaintiff can be highly productive and has in fact developed **two iOS apps** (one called “PDFSage”), as well as a **Web Portal**, and **several Android apps**. Plaintiff emphasizes that he **poses no public threat** while on medication unless physically attacked first, in which case he would exercise the right to self-defense (as he would even without medication).

6. Plaintiff seeks **an emergency judicial injunction** under Federal law, Massachusetts law, and **UN treaties** to which the United States is a signatory, **allowing him freedom** to take the medications he knows are effective for his ADHD symptoms, **despite any claimed illegality**. Plaintiff asserts that denying him these medications not only violates **his rights under state and federal law**, but also **contravenes international human rights standards**.

7. Plaintiff has filed Police Report Number 225 with Beth Israel Lahey Deaconess Public Safety. Plaintiff asserts that this police report documents larceny of Plaintiff’s MacBook

Pro and prescription Adderall. Plaintiff underscores that neither possessing a medical degree nor purporting to have medical expertise entitles any individual—including Defendants—to commit theft or otherwise infringe on an individual's rights under Massachusetts or federal law.

8. Plaintiff further alleges that Beth Israel Lahey Deaconess Hospital's Public Safety Department, while publicly funded, showed improper deference to individuals with medical credentials, **in violation of Plaintiff's rights to equal protection** under the Fourteenth Amendment of the U.S. Constitution and related state laws.

9. Plaintiff additionally seeks **a strong judicial injunction** and/or a restraining order—**requiring**:

- The Massachusetts government and law enforcement entities to **cease any interference** with Plaintiff's lawful or necessary possession and usage of ADHD medication (including what Plaintiff describes as "**counterfeit Adderall**").

- Beth Israel Lahey Deaconess Hospital's Public Safety officers and associated personnel to comply with federal law and **the Fourteenth Amendment's Equal Protection** requirements, prohibiting them from favoring medical professionals or any other persons over those who report legitimate theft or other crimes.

## II. JURISDICTION AND VENUE

10. **Subject Matter Jurisdiction**: This Court has federal question jurisdiction pursuant to **28 U.S.C. § 1331** because Plaintiff alleges violations of federal constitutional law, including but not limited to the Fourteenth Amendment to the U.S. Constitution. Supplemental jurisdiction over related state law claims exists pursuant to **28 U.S.C. § 1367**.

11. **Personal Jurisdiction**: Defendants are domiciled in, or conduct business in, the Commonwealth of Massachusetts. The alleged conduct and harm occurred in Massachusetts, giving this Court jurisdiction over Defendants.

12. **Venue**: Venue is proper in this district under **28 U.S.C. § 1391**, because the events or omissions giving rise to the claims occurred in this district, and Defendants reside or regularly conduct business here.

## III. PARTIES

13. **Plaintiff**:

- **Bo Shang** is a resident of the Commonwealth of Massachusetts (or specify residency), and is the rightful owner of the personal property alleged to have been stolen, as well as the individual whose ADHD medication (both legitimately prescribed and "counterfeit") has allegedly been confiscated or stolen over the past seven years.

14. **Defendant Gejing Deng**:

- Upon information and belief, **Gejing Deng** is Plaintiff's mother. Plaintiff contends that Deng participated in, facilitated, or otherwise caused the theft of Plaintiff's property.

15. **Defendant Yusi Gong:**

- Upon information and belief, **Yusi Gong** is an individual who may also be in the medical field or in some way acted in concert with Deng. Plaintiff contends that Gong aided, abetted, or participated in the alleged theft of Plaintiff's property.

16. **Defendant Beth Israel Lahey Deaconess Hospital:**

- **Beth Israel Lahey Deaconess Hospital** is a hospital corporation or entity operating in the Commonwealth of Massachusetts. Plaintiff contends that the Hospital and its publicly funded Public Safety Department failed to appropriately respond to or investigate the theft, and instead improperly favored or protected its own personnel and affiliates.

17. **Defendant The Commonwealth of Massachusetts:**

- Plaintiff alleges that **the State of Massachusetts** itself, acting through its agencies, officers, and possibly aided by local police departments, played a role in confiscating or otherwise interfering with Plaintiff's possession of both legitimate and counterfeit ADHD medication, thereby exacerbating Plaintiff's ADHD and causing severe mental and emotional distress.

18. **Beth Israel Deaconess Public Safety**

- Upon information and belief, various **local police departments** within Massachusetts (to be named more specifically upon further identification) have confiscated or participated in the removal of Plaintiff's ADHD medication over a span of seven years. Plaintiff contends that these actions were unauthorized, discriminatory, and violated both state and federal law.

19. **Defendant [John Doe or Named Parents and Relatives]:**

- Plaintiff alleges that **his parents and certain relatives** have repeatedly taken or destroyed Plaintiff's ADHD medication. Despite the personal relationship, these acts nonetheless constitute theft or tortious interference under the law. Plaintiff further contends that these relatives acted with or were emboldened by certain state actors, compounding the constitutional violations.

#### **IV. FACTUAL ALLEGATIONS**

20. On or about the dates set forth in Police Report Number 225, filed with Beth Israel Lahey Deaconess Public Safety, Plaintiff alleges the following:

21. Plaintiff was in possession of an **M3 Pro MacBook Pro**.

22. Plaintiff also possessed **60 prescription controlled substance pills**, lawfully obtained from CVS pharmacy, of which **40 were 20mg Adderall** tablets.

23. Defendants Deng and Gong, acting individually and/or in concert, allegedly took or caused to be taken Plaintiff's MacBook Pro and prescription pills **without consent**.

24. Plaintiff immediately reported this theft to Beth Israel Lahey Deaconess Public Safety and obtained a Police Report (No. 225).

25. Plaintiff alleges that, rather than conducting an **impartial investigation**, representatives from the Beth Israel Lahey Deaconess Public Safety favored or attempted to protect the interests of individuals with medical affiliations over Plaintiff's rights. Plaintiff contends that their actions or omissions violated Plaintiff's **right to Equal Protection** under the Fourteenth Amendment of the U.S. Constitution, the Supremacy Clause, and relevant Massachusetts statutes.

26. The theft of a laptop computer and Adderall prescription constitutes a violation of both Massachusetts state law (e.g., larceny statutes, such as Mass. Gen. Laws ch. 266) and federal law, as applicable. Plaintiff emphasizes that medical professionals or individuals claiming medical knowledge are not above the law, and that theft of property is unequivocally prohibited under Massachusetts state law and the federal criminal code.

27. Plaintiff further alleges that the public safety officers employed by Beth Israel Lahey Deaconess Hospital, who are funded or partially funded by the state, owe duties of neutrality, thorough investigation, and protection to all individuals equally, as mandated by the Fourteenth Amendment to the United States Constitution and related Massachusetts civil rights laws. By favoring certain Defendants with medical connections and refusing to act on Plaintiff's complaints, Plaintiff asserts that the hospital's security personnel violated these constitutional protections.

#### **Allegations of Extended Theft/Interference with ADHD Medication (7-Year Period)**

24. For the past **seven (7) years**, Plaintiff contends that:

- **The Commonwealth of Massachusetts** and **various local police departments** have repeatedly seized or destroyed Plaintiff's ADHD medication without due process, thus exacerbating Plaintiff's ADHD and causing severe mental and emotional distress.

- **Parents and relatives** of Plaintiff, in direct collaboration or tacit approval from law enforcement or healthcare providers, have also taken, withheld, or destroyed Plaintiff's medication, sometimes arguing that Plaintiff should not have it, or claiming they knew better about his medical needs.

- These actions left Plaintiff **debilitated, depressed, and nearly unable to function**, causing him to retreat from productive activities and nearly "cease to exist" in everyday life for extended periods.

25. Plaintiff alleges that **once on the proper ADHD medication**—including what is referred to as “**improvised**” or **counterfeit Adderall**—he was able to:

- Develop **two iOS apps**, one being **PDFSage**, a world-class PDF utility featuring OCR editing, bulk processing, machine vision scanning, and more.
- Launch a **Web Portal** and integrated applications that link to PDFSage.
- Build **several Android apps** along the way.
- Contribute positively to society and earn potential revenue from advanced AI features, without posing any public threat whatsoever.

26. Plaintiff acknowledges that **possession of counterfeit Adderall (methamphetamine)** is generally **illegal** under Massachusetts and federal law. However, Plaintiff challenges **the constitutionality of enforcing those prohibitions** under circumstances where he has been **systematically denied** legitimate prescription medication. Plaintiff asserts that denying him **any** ADHD medication that works effectively **violates**:

- **The Fourteenth Amendment** (due process and equal protection)
- **The Americans with Disabilities Act (ADA)** and related statutes
- **Massachusetts civil rights laws**
- **UN treaties** to which the U.S. is a signatory (e.g., international standards for the rights of persons with disabilities).

27. Plaintiff thus **seeks an emergency injunction** to **prevent the confiscation** or criminalization of the ADHD medication he requires, **whether or not** the medication is deemed “counterfeit,” until or unless there is a legitimate and constitutional basis to deny it.

28. Plaintiff underscores that he is **not a danger to himself or others** while on his ADHD medication and that such medication is crucial for him to maintain **a meaningful existence and the ability to engage in software engineering**. Further, **UN treaties** and **international human rights norms** support the principle that persons with disabilities must be granted **reasonable accommodations** and **not deprived** of essential treatments solely based on paternalistic or discriminatory beliefs.

## **V. CAUSES OF ACTION**

### **COUNT I: LARCENY / CONVERSION (State Law Claims)**

29. Plaintiff realleges and incorporates by reference all paragraphs above.

30. Defendants Deng and Gong took, retained, or wrongfully exercised control over Plaintiff’s laptop and prescription medication without consent.

31. As a direct and proximate result, Plaintiff suffered losses including the value of the laptop and the medication.

**COUNT II: NEGLIGENCE / NEGLIGENT SUPERVISION (Against Beth Israel Lahey Deaconess Hospital)**

32. Plaintiff realleges and incorporates by reference all paragraphs above.

33. Beth Israel Lahey Deaconess Hospital owed Plaintiff a duty of reasonable care, including proper supervision and training of its Public Safety officers.

34. Beth Israel Lahey Deaconess Hospital allegedly failed to properly supervise, train, or manage its officers, resulting in the mishandling of the theft investigation and favoritism toward medically affiliated persons.

**COUNT III: VIOLATION OF CIVIL RIGHTS (Fourteenth Amendment Equal Protection) [42 U.S.C. § 1983]**

35. Plaintiff realleges and incorporates by reference all paragraphs above.

36. Plaintiff alleges that Beth Israel Lahey Deaconess Public Safety Officers, **and other state actors** (including the State of Massachusetts and certain local police departments), acting under color of law, deprived Plaintiff of the right to **equal protection** when they favored certain individuals (e.g., those with medical backgrounds or familial relationships) over Plaintiff, despite credible theft allegations.

37. Plaintiff is entitled to relief under **42 U.S.C. § 1983** for violations of his constitutional rights.

**COUNT IV: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED)**

38. Plaintiff realleges and incorporates by reference all paragraphs above.

39. Defendants' conduct, including theft of essential personal property and prescription/counterfeit medication over multiple years, was extreme and outrageous.

40. Plaintiff suffered severe emotional distress as a direct result of Defendants' actions, including significant depression, debilitation, and lost productivity.

**COUNT V: VIOLATION OF DISABILITY RIGHTS (Potential ADA and UN Treaties)**

41. Plaintiff realleges and incorporates by reference all paragraphs above.

42. Plaintiff has ADHD, which can qualify as a disability under **the Americans with Disabilities Act ("ADA")**. Defendants, including state or local government entities, and individuals acting in concert with them, allegedly interfered with Plaintiff's access to medication necessary to manage this disability.

43. Such interference constitutes a form of discrimination on the basis of disability, violating **Title II of the ADA** and possibly relevant **Massachusetts disability rights laws**.

44. Moreover, to the extent that the U.S. is a signatory to relevant **UN treaties**, Defendants' conduct may also contravene international human rights obligations concerning the treatment and dignity of individuals with disabilities.

#### **COUNT VI: DECLARATORY JUDGMENT / CONSTITUTIONAL CHALLENGE TO CONTROLLED SUBSTANCES ENFORCEMENT (As Applied)**

45. Plaintiff realleges and incorporates by reference all paragraphs above.

46. Plaintiff seeks a declaratory judgment that **applying any state or federal criminal statute prohibiting the possession of counterfeit Adderall (methamphetamine)** to Plaintiff's situation, **where lawful prescriptions have been repeatedly withheld or confiscated**, violates Plaintiff's **constitutional rights** (including the Fourteenth Amendment and the right to bodily integrity and medical autonomy), as well as the **ADA** and relevant **UN treaties**.

47. Plaintiff maintains that, **as applied** to him, criminal enforcement of counterfeit medication laws is **unconstitutional** because it deprives him of the **only** effective treatment for his ADHD, effectively punishing him for a condition that requires medication for normal functioning.

#### **VI. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff **Bo Shang** respectfully requests the following:

1. **Compensatory Damages** in an amount to be proven at trial, including but not limited to the value of the stolen laptop and prescription medication, any related medical or counseling costs, and compensation for lost productivity or other harm caused by the forced withdrawal from necessary ADHD medication.

2. **Punitive Damages** against Defendants for willful, wanton, and reckless conduct, where applicable by law.

3. **Declaratory Relief** declaring that Defendants' actions violated Plaintiff's state and federal rights, as well as any relevant international human rights standards for the protection of persons with disabilities. **Additionally**, a declaration that **as-applied enforcement** of counterfeit Adderall prohibitions **violates Plaintiff's constitutional and disability rights** under the specific circumstances alleged.

4. **Injunctive Relief / Restraining Order**, compelling Defendants, including:

- **Beth Israel Lahey Deaconess Hospital's Public Safety Department** and any associated persons,



- **The Commonwealth of Massachusetts,**
- **Local Police Departments in Massachusetts,**
- **Plaintiff's parents and relatives,**

to **strictly adhere** to and **enforce** federal law, constitutional protections, and relevant disability rights standards, including but not limited to:

- **Prohibiting** the confiscation of Plaintiff's ADHD medication, **including "counterfeit" medication**, unless authorized by a valid court order that comports with due process and finds a legitimate, non-discriminatory basis for confiscation.
- **Ensuring neutrality** in all investigations, regardless of the professional, familial, or medical status of any individual involved.
- **Mandating compliance** with the Fourteenth Amendment's Equal Protection requirements, ensuring no preferential or discriminatory treatment.
- **Prohibiting** any retaliation against Plaintiff or any complainants who report theft or other alleged criminal activity.
- **Permitting** Plaintiff to continue taking the ADHD medication he deems necessary, **absent a lawful, constitutionally valid prohibition**, so that he can remain productive and avoid severe mental/emotional harm.

5. **Attorneys' Fees and Costs** pursuant to **42 U.S.C. § 1988** or other applicable law, if Plaintiff retains counsel and where allowed.

6. **Any Other Relief** the Court deems just and proper, including but not limited to a judicial injunction or restraining order (such as one from Judge Tong or any other competent judge) that orders Massachusetts authorities to uphold **federal law protections** for victims of theft and to **refrain from showing preferential treatment** to individuals with medical affiliations or familial relationships. This also includes **a directive** that state or local authorities **not** arrest or prosecute Plaintiff **solely for possessing counterfeit ADHD medication** if that medication is necessary to manage Plaintiff's disability and lawfully prescribed medication has been withheld or remains otherwise inaccessible.

## **VII. DEMAND FOR JURY TRIAL**

Plaintiff **demands a trial by jury** on all issues so triable.

**DATED:** January 27, 2025

**Respectfully submitted,**

**/s/ Bo Shang**

**(Pro Se or Through Counsel)**

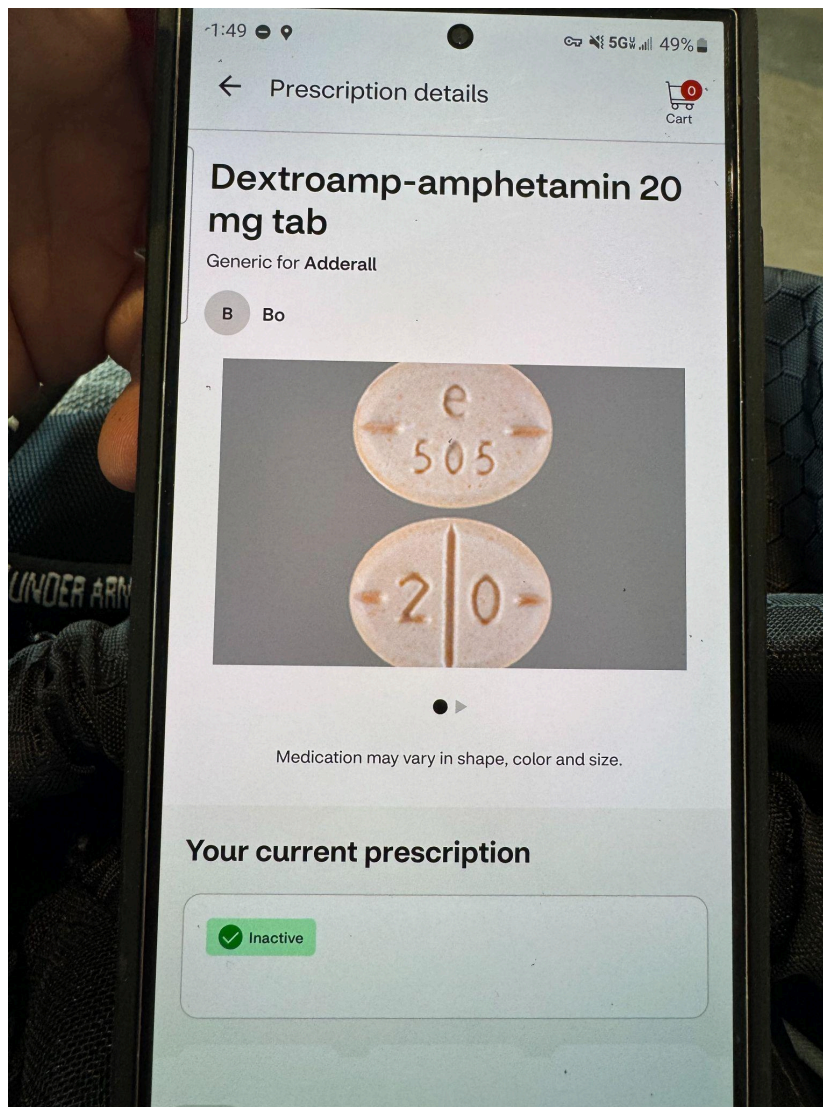
10 McCafferty Way

Burlington, MA 01803

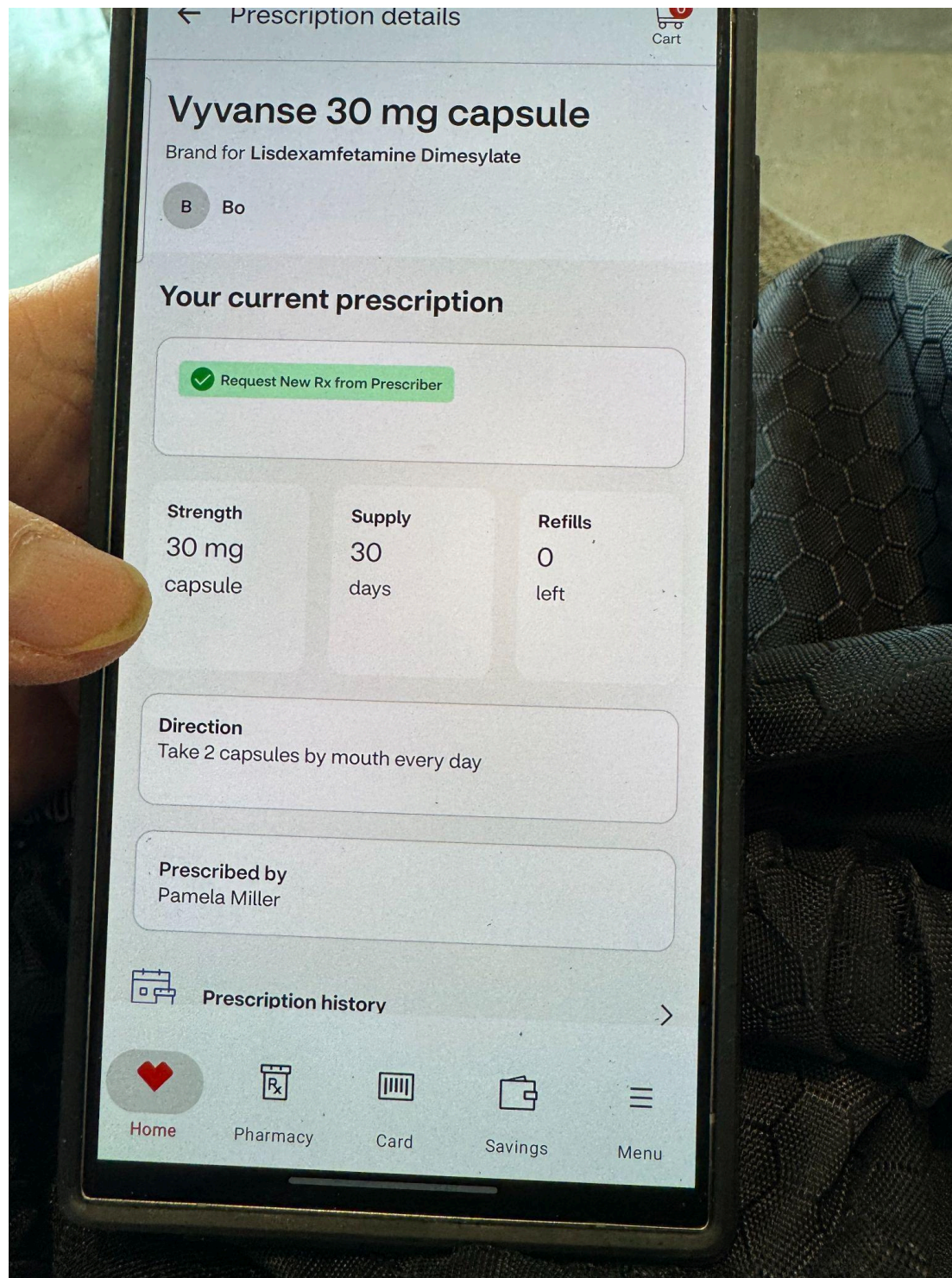
(781) 999-4101 | (617) 618-8279

[bo@shang.software](mailto:bo@shang.software) | [boshangsoftware@proton.me](mailto:boshangsoftware@proton.me)

**EXHIBIT 1:** Plaintiff's prescription Adderall in mid 2024, stolen by Defendants Beth Israel Deaconess, Dr Yusi Gong, and Gejing Deng











**EXHIBIT 2:** Plaintiff's prescription Vyvanse in mid-2024, providing one example of how the Plaintiff was prescribed amphetamines consistently since 2017





**EXHIBIT 3:** The Plaintiff had to resort to purchasing online in order to live a fulfilling and productive life, as guaranteed by the United States Constitution. The Plaintiff is far from a threat to either the public nor Gejing Deng when productive, in contrary to what MA judges and DA's claim

Home Market Forum **Orders** Disputes Messages



Visit the mainpage

## Orders

Home > Orders

**Legend**

- Indigo-dot implies there was an update (e.g. the state of the order changed)
- Grey-dot implies that you have seen the order already and there is no new update

## New

These orders are waiting to be accepted by the vendor

• #ZXBpWWi4MW1Qdk9xTWdLeFJvb2Z5dz09 Vendor: officialstatus | Price: 76.84 €

Created: 24.01.2025 04:59

## Shipped

These orders are on the way to your destination, if you do not receive them before the date on the right of each order, you should start a dispute to freeze the funds from reaching the vendor

• #d2dteDc2M2JMVnIvMFJrTWw3SDJHQT09 Vendor: TegrityPharma | Price: 68.08 €

Auto-Finalize after: 04.02.2025 13:44

## Finalized

These orders are finalized and waiting for your review, you have time till the date on the right of each order

• #U2hUKzhLRWM3SGRvSDY0QjdXZldadz09 Vendor: TegrityPharma | Price: 67.27 €

Deleted after: 17.02.2025 15:37

• #Zmp4dWcxRWtIUVAxYWVJc0NhT0FiUT09 Vendor: addyrus | Price: 69.19 €

Deleted after: 17.02.2025 15:36

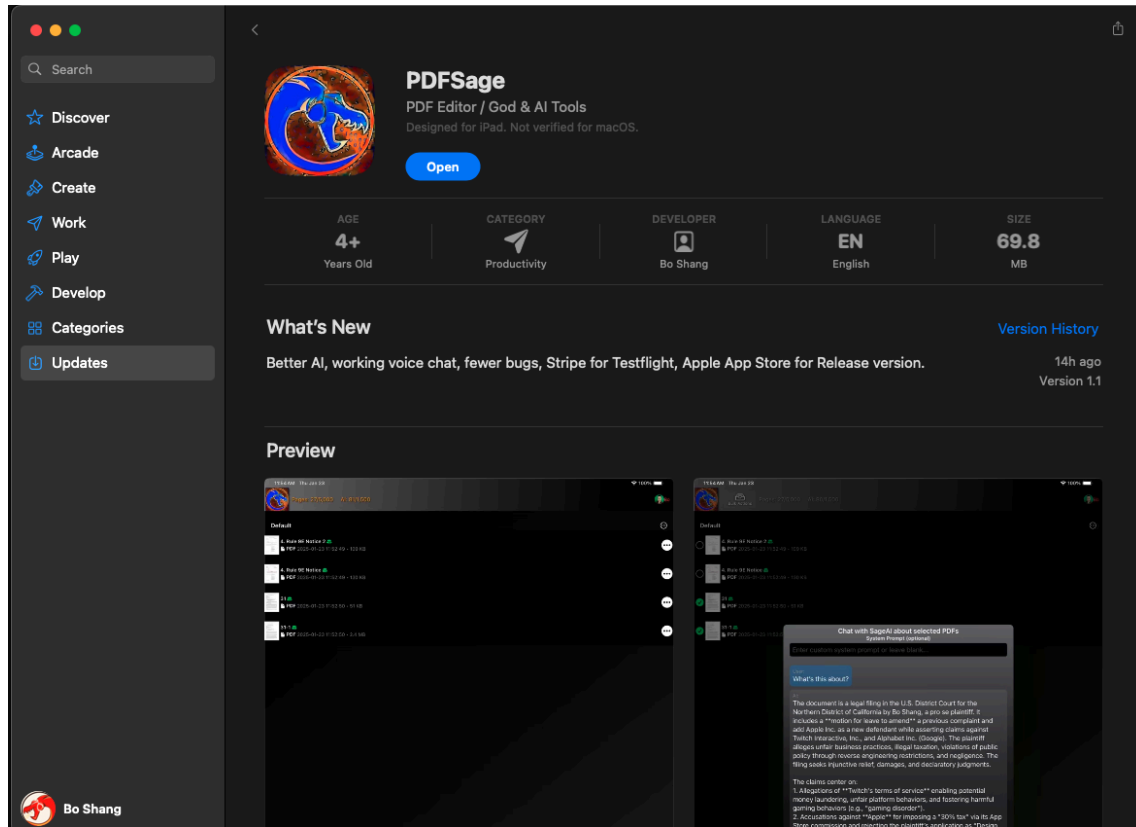
## Cancelled

These orders were cancelled, they are now waiting to be deleted from the system, there is a timer on the right which indicated the date for it

• #ekNxditWYThkbjc1NVVKSTRBVXIYQT09 Vendor: MEXICALICARTEL | Price: 82.74 €

Deleted after: 19.02.2025 17:33

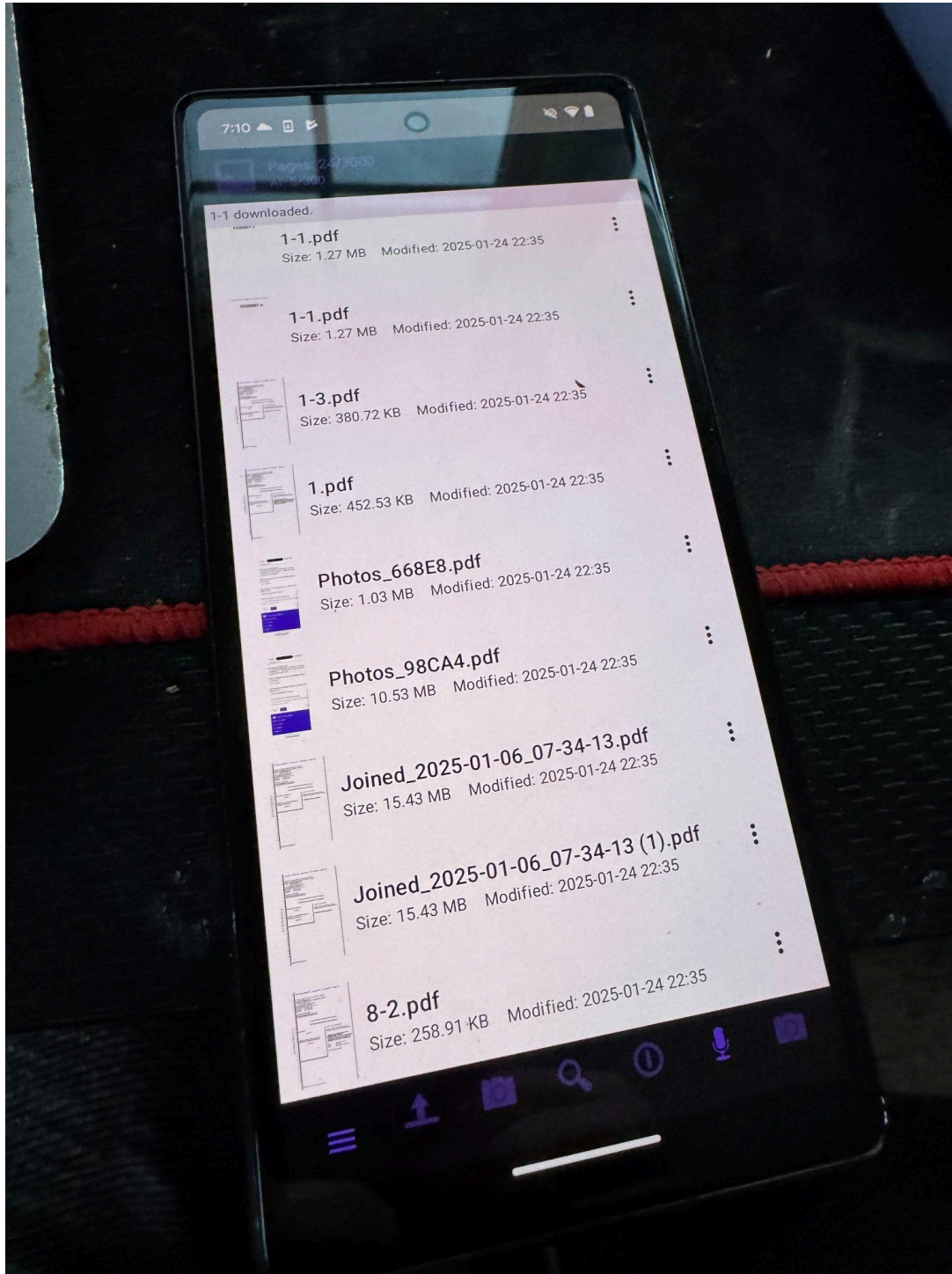
**EXHIBIT 4a:** PDFSage (cross platform iOS web and Android, with Firebase Auth login support for all other apps) created early-mid January 2025 from scratch in roughly 2 weeks using counterfeit Adderall



The screenshot shows a web browser window with the address bar displaying 'pdfsage.me'. The browser's address bar and tabs are visible at the top. The website has a blue navigation bar with links: HOME, CONNECT4, USER ACCOUNT, CHATGPT USER, ADMIN, PDFS, and LOGOUT. Below the navigation bar, there is a pink box containing the text 'Current Unresolved Bug(s):' followed by a bullet point: '• iOS 1.1 finally bug-freeish: Working hard for 1.2 and getting Web & Android up!'. Below this, it says 'This list may be updated frequently. If you discover any new issues, please let us know!'. The main content area has a heading 'Important PDFSage & Info & Tools App Links'. Below the heading, it states 'PDFSage is delivering world class, and soon world-class beating traditional tools—central PDF Home Hub with OCR, bulk actions, machine vision scanning, etc.—all for free! And selling irresistibly fun AI features for revenue.' It then provides links for 'PDFSage Link', 'Info & Tools', and 'TestFlight Links'. At the bottom, it lists 'Sites: pdfsage.org | pdfsage.io' and a note about the Android app. The footer contains 'Contact / Source: GitHub YouTube X'.

The image shows a Windows desktop environment. On the left, a terminal window displays the output of a Jupyter Notebook. The output shows the installation and configuration of TensorFlow Lite for Microcontrollers. Key steps include installing TensorFlow Lite Runtime and TensorFlow Lite Micro, and then running a script to install the TensorFlow Lite Micro Python bindings. The output also shows the creation of a TensorFlow Lite Micro model and the execution of the model on a Raspberry Pi 4. On the right, a video call window is open, showing a person's face. The window has various controls like 'Stop Streaming', 'Start Recording', and 'Drop Frames 0.0%'. The video call window also shows a 'Message ChatGPT' button and a 'YouTube Live Control Panel'.

**EXHIBIT 5a:** Android version of PDFSage home screen, mirroring live iOS counterpart





**EXHIBIT 5b:** Android PDFSage editor, mirroring live iOS counterpart

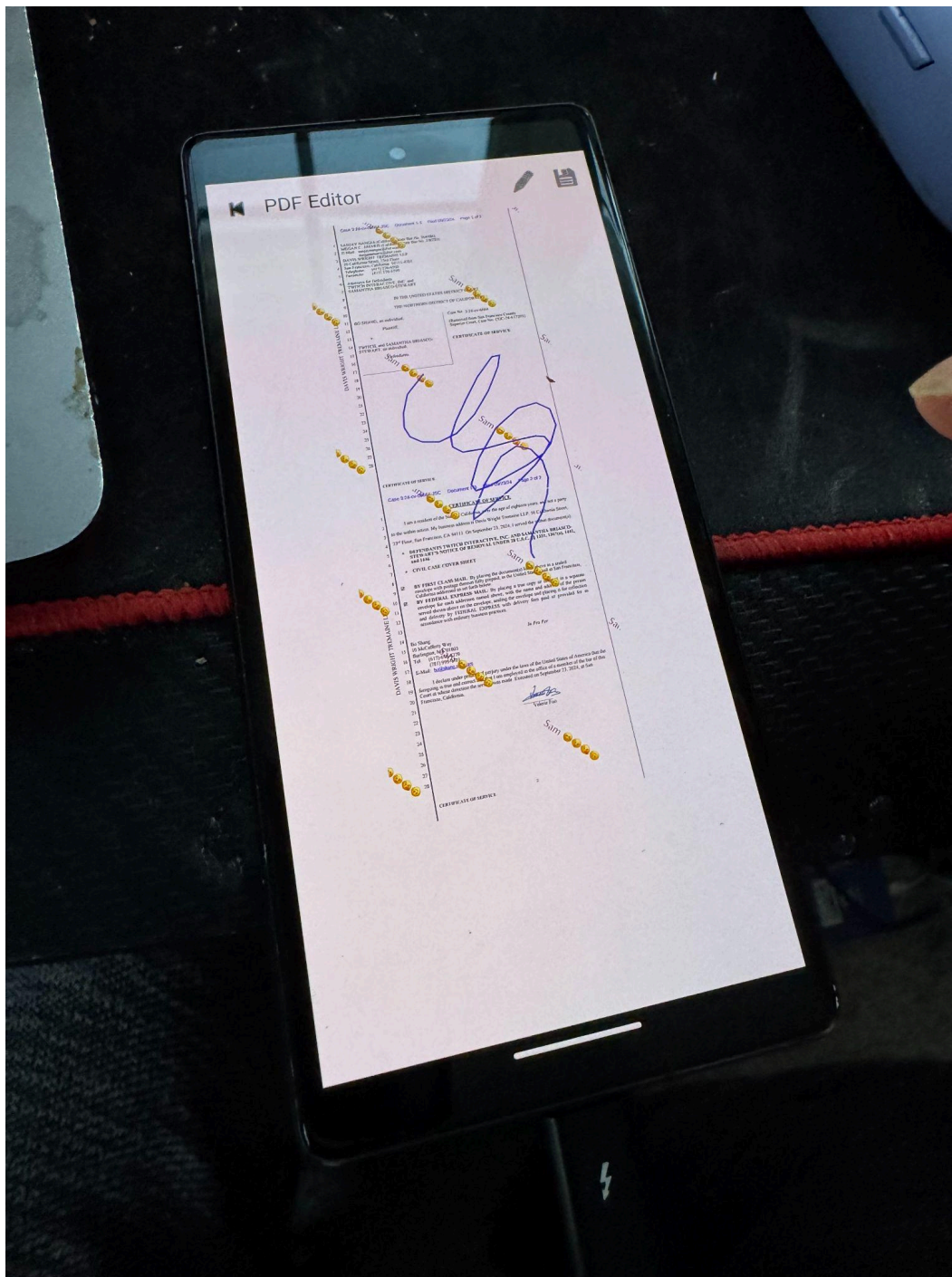




EXHIBIT 6a: First day PDFSage was integrated with Stripe API on Jan 24 2025

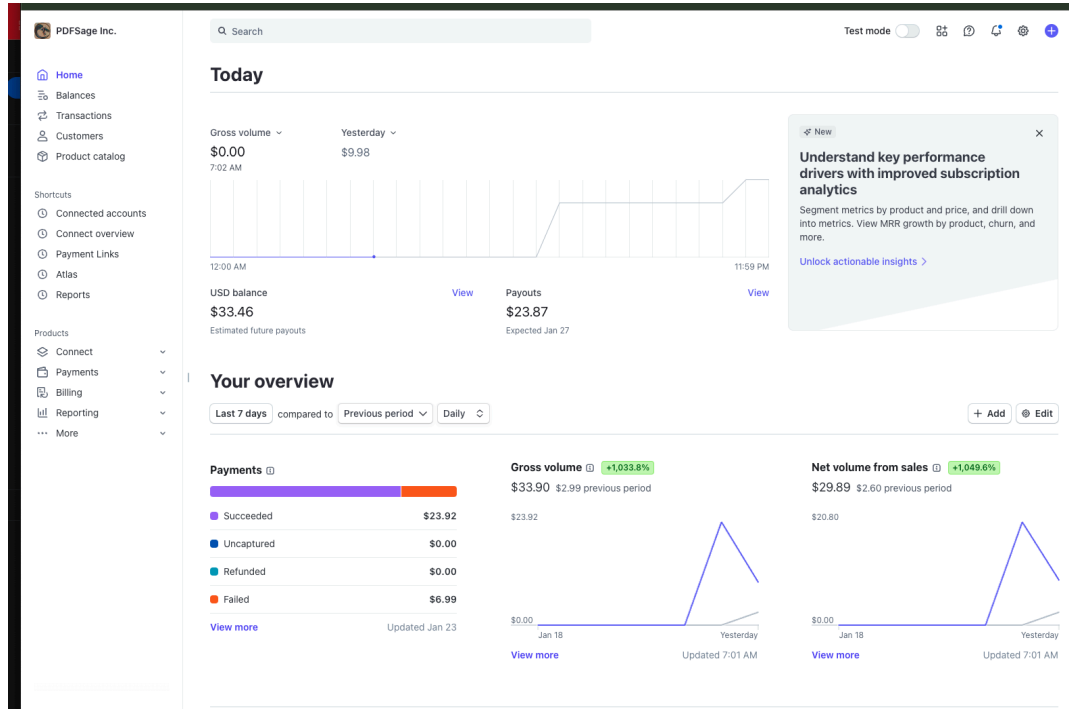


EXHIBIT 6b: Deploying the Stripe API via Firebase CLI on Jan 24 2025

```
stripe_firebase --zsh --202x80

[bo]Mac: stripe_firebase % firebase deploy

-- Deploying to 'pdfsage-5ecaf'...

i deploying functions
Running command: npm --prefix "$RESOURCE_DIR" run lint

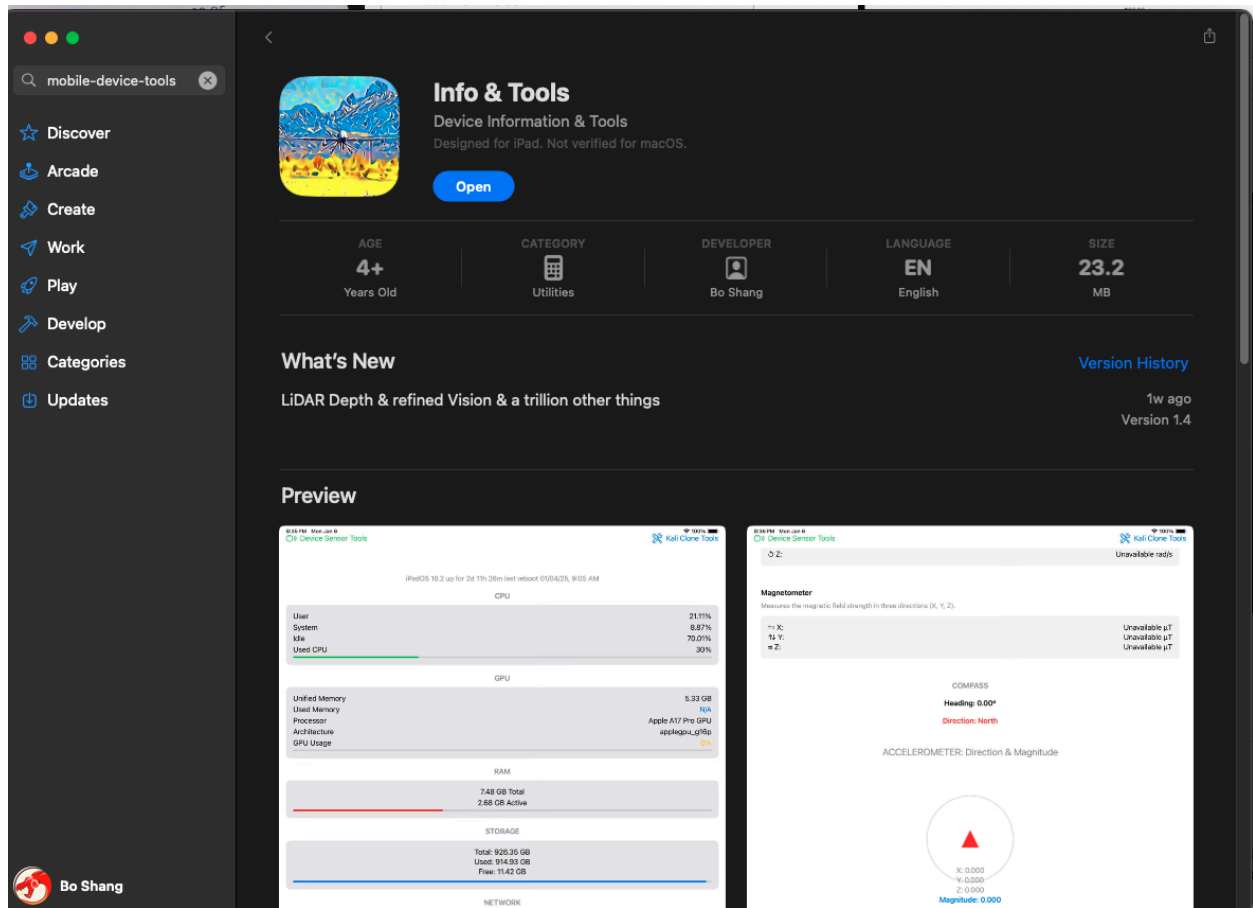
> lint
> eslint .

✓ functions: Finished running predeploy script.
i functions: preparing codebase default for deployment
i functions: preparing codebase stripeapi for deployment
i functions: ensuring required API cloudfunctions.googleapis.com is enabled...
i functions: ensuring required API cloudbuild.googleapis.com is enabled...
i artifactregistry: ensuring required API artifactregistry.googleapis.com is enabled...
i functions: required API cloudbuild.googleapis.com is enabled
i functions: required API cloudfunctions.googleapis.com is enabled
i artifactregistry: required API artifactregistry.googleapis.com is enabled
▲ functions: package.json indicates an outdated version of firebase-functions. Please upgrade using npm install --save firebase-functions@latest in your functions directory.
i functions: Loading and analyzing source code for codebase stripeapi to determine what to deploy
Serving at port 8321
2025-01-24 at 11:25:48 PM
▲ functions: package.json indicates an outdated version of firebase-functions. Please upgrade using npm install --save firebase-functions@latest in your functions directory.
i functions: Loading and analyzing source code for codebase stripeapi to determine what to deploy
Serving at port 8182
2025-01-24 at 11:23:38 PM
i extensions: ensuring required API firebaseextensions.googleapis.com is enabled...
i extensions: required API firebaseextensions.googleapis.com is enabled
i functions: preparing functions directory for uploading...
i functions: packaged /Users/ba/Library/CloudStorage/OneDrive-Personal/stripe_firebase/functions (124.66 KB) for uploading
i functions: ensuring required API run.googleapis.com is enabled...
i functions: ensuring required API eventarc.googleapis.com is enabled...
i functions: ensuring required API pubsub.googleapis.com is enabled...
i functions: ensuring required API storage.googleapis.com is enabled...
i functions: required API pubsub.googleapis.com is enabled
i functions: required API eventarc.googleapis.com is enabled
i functions: required API storage.googleapis.com is enabled
i functions: required API run.googleapis.com is enabled
i functions: generating the service identity for pubsub.googleapis.com...
i functions: generating the service identity for eventarc.googleapis.com...
i functions: functions folder uploaded successfully
i functions: Skipping the deploy of unchanged functions.
i functions[api(us-central1)] Skipped (No changes detected)
i functions: cleaning up build files...
▲ functions: Unhandled error cleaning up build images. This could result in a small monthly bill if not corrected. You can attempt to delete these images by redeploying or you can delete them manually at https://console.cloud.google.com/gcr/images/pdfsage-5ecaf/us/gcf

✓ Deploy complete!

Project Console: https://console.firebase.google.com/project/pdfsage-5ecaf/overview
[bo]Mac: stripe_firebase %
```

**EXHIBIT 7:** Mobile-Device-Tools, with 106 TestFlight participants, many units sold on Apple's live App Store, and over 20 launches per unit sold according to Apple's analytics, coded in mid-January 2025 from scratch in less than 24 hours total using counterfeit Adderall



**EXHIBIT 8:** On January 9 2025, Judge Jacqueline Scott Corley of the US District Court of Northern California granted literally 100% of the Plaintiff's (Bo) request in a Motion to Amend or join Apple and Google in a lawsuit vs Twitch. The defense attorneys argued for a rejection of the motion with prejudice, and lost horribly in their ad-hominem attack

Docket\_30\_Judge\_Jaceline\_Scott\_Corley\_Order.pdf

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United States District Court  
Northern District of California

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BO SHANG,  
Plaintiff,  
v.  
TWITCH INTERACTIVE, INC., et al.,  
Defendants.

Case No. [3:24-cv-06664-JSC](#)  
**ORDER RE: DEFENDANTS' MOTION  
TO DISMISS**  
Dkt. No. 8

Plaintiff, a Massachusetts resident proceeding without attorney representation, filed a lawsuit against Twitch Interactive, Inc. and Samantha Briasco-Stewart (together, "Defendants") in San Francisco Superior Court. Defendants removed to federal court pursuant to federal question jurisdiction. Now pending before the Court is Defendants' motion to dismiss.

**JURISDICTION**

As drafted, the Court construed "Plaintiff's complaint as setting forth a single cause of action: a violation of California Business and Professions Code Section 17200 et seq." (Dkt. No. 14).<sup>1</sup> So, the Court ordered Plaintiff to identify the causes of action to determine whether the Court had subject-matter jurisdiction. (*Id.*) In an effort to further clarify, the Court issued a second order to show cause. (Dkt. No. 18.)

In response, Plaintiff clarified he "would like to revise the Complaint by removing the 1st and 14th Amendment claims the Plaintiff made." (Dkt. No. 16 at 1.) Plaintiff stated "[f]or Twitch as a company, [he] intends to have only California Business and Professions Code – Section 17200 et seq as a cause of action." (Dkt. No. 19 at 1.) Plaintiff alleged Twitch violated the

**EXHIBIT 9:** On January 12, 2025, Plaintiff Bo filed a Motion to Amend joining Apple and Google in his lawsuit against Twitch, in an effort to defend the rights of Americans and Internet users around the world

3:24-cv-06664-JSC: Filing 31A

1 / 21 | 100% + | [Icons]

Case 3:24-cv-06664-JSC Document 31-1 Filed 01/12/25 Page 1 of 21

[PROPOSED] FIRST AMENDED COMPLAINT

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Bo Shang (Pro Se), Developer TeamID HUPDNC4PWJ,  
Plaintiff,  
v.  
Twitch Interactive, Inc.;  
Apple Inc. (NEWLY JOINED DEFENDANT);  
Alphabet Inc. (Google),  
Defendants.

Case No.: 3:24-cv-06664-JSC

FIRST AMENDED COMPLAINT FOR INJUNCTIVE RELIEF,  
DAMAGES, DECLARATORY JUDGMENT, AND OTHER RELIEF  
JURY TRIAL DEMANDED

1. INTRODUCTION

1.1 Plaintiff, pro se, hereby files this First Amended Complaint in compliance with the Court's directives (Dkt. No. 30) and in accordance with Federal Rules of Civil Procedure 15(a)(2), 19, 20, and 21. This Amended Complaint re-asserts and clarifies claims against Defendant Twitch Interactive, Inc. ("Twitch") and seeks to join Apple Inc. ("Apple") and Alphabet Inc. ("Google"), collectively "Defendants," for conduct involving unfair or unlawful business practices, unconscionable reverse engineering ("RE") clauses, and unauthorized private "taxation."

1.2 Plaintiff's initial lawsuit against Twitch included allegations of constitutional violations under the First and Fourteenth Amendments. The Court held that such claims are not viable against a private entity. Plaintiff now proceeds against Twitch under California's Unfair Competition Law (Cal. Bus. & Prof. Code § 17200, et seq.) and related theories, clarifying that Twitch's conduct may violate federal and state laws related to potential illegal gambling or money laundering, thereby triggering the "unlawful," "unfair," or "fraudulent" prongs of Section 17200.

1.3 Plaintiff adds Apple and Google as Defendants because each imposes or enforces restrictive Terms of Service ("TOS") or license agreements that forbid or severely limit reverse engineering ("RE"). Plaintiff contends that these RE prohibitions, combined with significant platform fees or commissions (including Apple's "30% tax," Google's similar fee structure, and Twitch's TOS that hamper investigations), violate fundamental principles of fair commerce,

**EXHIBIT 10a:** I Bo Shang, on today January 25 2025, swear under perjury that nearly 100% of the motivation of filing these lawsuits is altruism and to defend the rights of Americans and communities around the world. In mid 2023 President Biden wrote to Bo regarding these abridged rights, and now Bo is taking action.



THE WHITE HOUSE  
WASHINGTON

June 21, 2023

Dear Mr. Shang,

Thank you for writing to me. While rapid technological advancement has helped connect us and opened up exciting possibilities for what the world can be, the rise of tech platforms has also introduced new and difficult challenges, from deteriorating mental health and well-being to the erosion of basic rights of Americans and communities worldwide. In particular, a handful of large tech companies have prioritized profits over the health, well-being, and safety of the public; they operate with minimal transparency and have evaded accountability for too long.

At the heart of American capitalism lies a simple idea: open and fair competition. The Internet should be no exception. Instead, rapid growth of digital platforms and social media companies has outpaced federal regulations, leading to a massive technology industry controlled by only a few big players. Rather than competing for consumers, big tech companies are consuming their competitors, leaving Americans fewer choices for internet platforms, providers, and online marketplaces and less control over how their personal data is acquired and used.

We are at an inflection point and have the opportunity to both bring back much-needed competition while promoting transparency, accountability, and equity in the technology sector. I was proud to sign an Executive Order that crystalized my Administration's commitment to help reign in big tech by challenging bad mergers, enforcing antitrust laws, and establishing rules on surveillance, data collection, and consumer privacy. And I continue to call on Congress to address the power of tech platforms, strengthen privacy protections, and ban targeted advertising to our children.

I appreciate your concern about big tech, and I am dedicated to ensuring that the Government continues to put you, the American people, first in everything we do.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Biden", with a large, stylized flourish above it.

# EXHIBIT 10b: Docket number 32 filed on Jan 25 2025 under perjury

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		(Filed on 12/5/2024) (Entered: 12/05/2024)
12/21/2024	26	Request for Judicial Notice <i>Notice of (non)Settlement of ADR</i> filed byBo Shang. (Shang, Bo) (Filed on 12/21/2024) (Entered: 12/21/2024)
01/08/2025	27	COMPLAINT against Apple along with exhibits filed by Bo Shang. Responses due by 1/22/2025. Replies due by 1/29/2025. (Attachments: # <u>1</u> Declaration Plaintiff will initiate a somewhat related lawsuit against Apple Inc in this same court. (Shang, Bo) (Filed on 1/8/2025) Modified text on 1/9/2025, to conform with document posted by plaintiff. (cv, COURT STAFF). (Entered: 01/08/2025)

01/09/2025	28	Letter from the White House signed by Joe Biden dated 6/21/23 filed byBo Shang. (Attachments: # <u>1</u> Affidavit of how Twitch's Deception of Legitimacy Affects Constitutional Rights)(Related document(s) <u>27</u> ) (Shang, Bo) (Filed on 1/9/2025) Modified text on 1/9/2025, *** to conform with document posted by plaintiff.(cv, COURT STAFF). (Entered: 01/09/2025)
01/09/2025	29	EXHIBIT – (controlled unclassified information) re <u>27</u> First MOTION to Dismiss <i>with prejudice Affidavit of Self Defense</i> filed by Bo Shang. (Attachments: # <u>1</u> Declaration Affidavit of Rationale of Self Defense)(Related document(s) <u>27</u> ) (Shang, Bo) (Filed on 1/9/2025) Modified TEXT on 1/9/2025, *** to conform with document submitted by plaintiff. (cv, COURT STAFF). (Entered: 01/09/2025)
01/09/2025		Electronic filing error. Incorrect event used [err101] Re: <u>28</u> Affidavit in Opposition to Motion, filed by Bo Shang, <u>29</u> Affidavit in Support of Motion, filed by Bo Shang, <u>27</u> First MOTION to Dismiss <i>with prejudice</i> filed by Bo Shang (cv, COURT STAFF) (Filed on 1/9/2025) (Entered: 01/09/2025)
01/09/2025	30	<b>ORDER by Judge Jacqueline Scott Corley granting <u>8</u> Motion to Dismiss.</b> Amended complaint is due by February 10, 2025. (ahm, COURT STAFF) (Filed on 1/9/2025)  Any non-CM/ECF Participants have been served by First Class Mail to the addresses of record listed on the Notice of Electronic Filing (NEF)  (Entered: 01/09/2025)
01/12/2025	31	First MOTION to Amend/Correct <i>[PROPOSED] FIRST AMENDED COMPLAINT</i> filed by Bo Shang. Responses due by 1/27/2025. Replies due by 2/3/2025. (Attachments: # <u>1</u> Proposed Order [PROPOSED] FIRST AMENDED COMPLAINT)(Shang, Bo) (Filed on 1/12/2025) (Entered: 01/12/2025)
01/25/2025	32	Declaration of Bo Shang in Support of <u>31</u> First MOTION to Amend/Correct <i>[PROPOSED] FIRST AMENDED COMPLAINT</i> <i>! Bo Shang, on today January 25 2025, swear under perjury that nearly 100% of the motivation of filing these lawsuits is altruism and to defend the rights of Americans and communities around the world. In mid 2023 President Biden wrote to Bo regarding these abridged rights, and now Bo is taking action.</i> filed byBo Shang. (Attachments: # <u>1</u> Supplement Lawsuit vs Massachusetts)(Related document(s) <u>31</u> ) (Shang, Bo) (Filed on 1/25/2025) (Entered: 01/25/2025)