SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

BO SHANG,

Plaintiff,

v.

TWITCH INTERACTIVE, INC.;
SAMANTHA BRIASCO-STEWART;
LINKEDIN CORPORATION,

Defendants.

Case No.: ____________________

COMPLAINT FOR FRAUD

Plaintiff, BO SHANG (“Plaintiff”), an American individual residing in the State of Massachusetts, by and through his undersigned counsel or in pro per, hereby alleges the following against Defendants TWITCH INTERACTIVE, INC. (“Twitch”), SAMANTHA BRIASCO-STEWART (“Briasco-Stewart”), and LINKEDIN CORPORATION (“LinkedIn”), and states as follows:

I INTRODUCTION AND OVERVIEW OF ALLEGATIONS

1. This case arises against the backdrop of Plaintiff’s prior action in the United States District Court for the Northern District of California, Case No. 3:24-cv-06664-JSC, presided over by the “legally blonde” Judge Jacqueline Scott Corley. Judge Corley initially granted Plaintiff’s motion to amend, signaling that Plaintiff’s Unfair Competition Law (“UCL”) claims may have had merit, but then, in a contradictory ruling, dismissed the claims with prejudice. This dismissal came a mere one day after Plaintiff declared “Operation Zeus Thunder,” a global legal, psychological, and cyberwarfare campaign designed to eradicate harmful gaming disorder worldwide.

2. The allegations in this Complaint focus on fraud associated with statements and conduct by Twitch, Briasco-Stewart, and LinkedIn, but also address critical security vulnerabilities—specifically SMBv2 and Address Space Layout Randomization (“ASLR”)—that Plaintiff has highlighted as central to Advanced Persistent Threats across the globe. Plaintiff emphasizes that these vulnerabilities, and others like them, have been researched and exposed by Plaintiff to combat judicial capriciousness, epitomized by Judge Corley’s abrupt reversal of her own prior

ruling.

3. Plaintiff contends that Twitch's operation is effectively a negative-sum, Ponzi-scheme-like enterprise—particularly dangerous because it exploits the mental welfare of American citizens and allied nations under the guise of online streaming and professional development. This exploitation is further amplified on LinkedIn, whose editorial mechanisms constitute more than neutral hosting.

4. Plaintiff's claims focus on how:

(a) Twitch's platform, marketed through LinkedIn, deceptively promises viability and sustainability as a streaming profession.

(b) Briasco-Stewart made statements about data security—especially regarding the storage and handling of credentials—that conflict with Twitch's own public stance on credential protection (e.g., OAuth, anti-plaintext protocols).

(c) LinkedIn materially contributed to these misrepresentations by algorithmically promoting, endorsing, or presenting content about Twitch's alleged security practices and career viability.

(d) Twitch, LinkedIn, and Briasco-Stewart each participated in creating or developing fraudulent statements, nullifying any immunity under Section 230 of the Communications Decency Act.

5. Against the bizarre backdrop of a federal judge who granted Plaintiff the green light to amend but then dismissed with prejudice—one day after the announcement of "Operation Zeus Thunder"—Plaintiff now seeks recourse in the Superior Court of California, highlighting how the systemic vulnerabilities in both the legal system (via a "legally blonde" judge's contradictory rulings) and the technology stack (SMBv2, ASLR, and other exploits) converge to harm Plaintiff and the public at large.

II PARTIES

6. Plaintiff BO SHANG is, and at all relevant times was, an American individual residing in the State of Massachusetts. He was exposed to various statements and claims on LinkedIn and Twitch's official marketing channels, causing him to believe that streaming on Twitch was a legitimate and secure profession.

7. Defendant TWITCH INTERACTIVE, INC. is a Delaware corporation with its principal place of business in San Francisco, California. Despite marketing itself as a "live streaming service" for gaming, esports, and other interactive content, Plaintiff alleges Twitch operates a fraudulent, negative-sum enterprise effectively amounting to a Ponzi scheme on the mental wellbeing of citizens.

8. Defendant SAMANTHA BRIASCO-STEWART is an individual believed to reside in San Francisco, California. Upon information and belief, she worked at Twitch for her entire seven-year career, making statements on LinkedIn about Twitch's security practices that conflict with official company policy and public statements.

9. Defendant LINKEDIN CORPORATION is headquartered in Sunnyvale, California. Upon information and belief, LinkedIn not only hosted but actively shaped or contributed to the alleged fraudulent statements by highlighting or

endorsing Briasco-Stewart's statements, effectively making it a co-creator of those statements and removing the company from safe-harbor eligibility under 47 U.S.C. § 230.

III JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction pursuant to the California Constitution and the general jurisdiction of the California Superior Courts. The amount in controversy exceeds the jurisdictional limits of this Court, exclusive of interest and costs.

11. Venue is proper in the County of San Francisco under California Code of Civil Procedure §§ 395(a) and 395.5 because Defendants reside in San Francisco County or direct substantial operations there, and the alleged wrongdoing (e.g., LinkedIn content, Twitch marketing, Briasco-Stewart's statements) occurred in or was directed to San Francisco County.

IV FACTUAL ALLEGATIONS

A. The "Legally Blonde" Judicial Whiplash in Federal Court

12. Plaintiff previously filed an action in the Northern District of California, Case No. 3:24-cv-06664-JSC, against similar defendants and on related claims. Judge Jacqueline Scott Corley, described by Plaintiff as "legally blonde," initially granted Plaintiff's motion to amend based on potential merit of Plaintiff's UCL claims. However, shortly thereafter, Judge Corley reversed course and dismissed the claims with prejudice—issuing the contradictory dismissal exactly one day after Plaintiff publicly declared "Operation Zeus Thunder."

13. Plaintiff avers that this abrupt whiplash represents a judicial system vulnerability akin to the SMBv2/ASLR exploits in software: an underlying flaw enabling advanced persistent threats, or in this case, contradictory judicial rulings, to undermine legitimate legal claims. Plaintiff believes that Judge Corley's reversal exemplifies the very "mental exploitation" at the heart of Twitch's predatory model.

B. Misrepresentations Regarding Data Security and Credential Storage

14. Twitch and Briasco-Stewart made repeated statements—amplified by LinkedIn—claiming that Twitch used industry-standard protocols to protect user credentials (e.g., OAuth) and did not store such credentials in plaintext.

15. Nonetheless, Briasco-Stewart publicly indicated on LinkedIn that she developed a "plaintext credential checker," acknowledging either the actual storage or potential handling of plaintext credentials at Twitch. This admission contradicts Twitch's public disclaimers and developer documentation.

16. Plaintiff relied on these conflicting statements when evaluating Twitch as a platform for professional streaming. The realized contradiction caused Plaintiff to lose faith in Twitch's claims and question LinkedIn's role in promoting these statements as credible and authoritative.

C. “Ponzi Scheme on the Brain” Allegations Against Twitch

17. Plaintiff alleges that Twitch’s core business model is tantamount to a Ponzi scheme that exploits users’ time, money, and mental faculties under the guise of career prospects and entertainment.

18. A publicly touted $100 million contract allegedly involving streamer “xQc” and the Kick platform (an entity closely tied to or spun off from Twitch gambling streams) raises serious questions about laundering and gambling ties. Another streamer, Pokimane, has publicly questioned the deal’s legitimacy while benefiting from monetized, parasocial subscription models that Twitch fosters.

19. Plaintiff contends that xQc’s purported gambling-related streams are linked to an estimated $685 million laundered on illicit cryptocurrency gambling sites. Such conduct, if accurate, implicates multiple federal statutes (18 U.S.C. §§ 1084, 1955, 1956, 1957) and California Penal Code §§ 330, 331, among others. Twitch’s platform, in Plaintiff’s view, knowingly profits from such illicit or questionable activities.

D. LinkedIn’s Active Role in Developing or Amplifying Misleading Content

20. LinkedIn purports to be merely a professional networking site, but Plaintiff asserts it goes well beyond neutral hosting by algorithmically promoting, endorsing, or otherwise presenting content. Through these mechanisms, LinkedIn became a co-developer of the fraudulent statements about Twitch’s security and streaming viability.

21. Ninth Circuit precedent (Fair Housing Council of San Fernando Valley v. Roommates.com, LLC, 521 F.3d 1157 (9th Cir. 2008) (en banc)) and Tenth Circuit precedent (FTC v. Accusearch, Inc., 570 F.3d 1187 (10th Cir. 2009)) hold that platforms are not immune under Section 230 when they materially contribute to the alleged unlawfulness of the content. Plaintiff contends LinkedIn’s role meets this threshold.

E. Microsoft Windows SMBv2 and ASLR Vulnerabilities in the Broader Context

22. Plaintiff highlights that longstanding security issues in Microsoft Windows (SMBv2 and ASLR) facilitate advanced persistent threats. Plaintiff believes Twitch and LinkedIn, in refusing to address or disclose these vulnerabilities, perpetuate the risk.

23. By touting robust security, Twitch misled users into a false sense of safety. In reality, advanced threat actors can exploit these known vulnerabilities, especially if Twitch’s backend improperly handles plaintext credentials. Plaintiff likens this concealment to the “legally blonde” judicial flip-flop that undermined Plaintiff’s claims in federal court—both are hidden flaws that undermine trust and stability.

F. Harm to Plaintiff

24. As a direct and proximate result of Defendants’ misrepresentations:

(a) Plaintiff expended time, resources, and mental energy believing Twitch was a secure, legitimate platform.

(b) Plaintiff suffered emotional distress upon discovering that the platform may be a negative-sum Ponzi scheme targeting unsuspecting users and content creators.

(c) Plaintiff's reliance on LinkedIn's and Twitch's portrayals led to lost opportunities, financial setbacks, and further psychological harm.

V SECTION 230 NON-IMMUNITY ALLEGATIONS

25. Defendants Twitch, Briasco-Stewart, and LinkedIn are not entitled to immunity under Section 230 of the Communications Decency Act (47 U.S.C. § 230) for these reasons:

(a) Twitch and Briasco-Stewart Authored or Developed Fraudulent Statements.

They directly crafted or participated in creating misleading statements about data security and professional viability, placing them squarely within the definition of "information content provider" under 47 U.S.C. § 230(f)(3).

(b) LinkedIn Actively Shaped or Developed Content.

Through "Suggested Posts," endorsements, and editorial-style amplification, LinkedIn materially contributed to the content's creation and purported credibility, removing it from Section 230's safe harbor.

(c) Defendants Engaged in Their Own Fraudulent Conduct.

Section 230 does not shield one's own unlawful misrepresentations. (See Barnes v. Yahoo!, Inc., 570 F.3d 1096 (9th Cir. 2009)).

(d) Commercial Viability and Ponzi-Scheme Allegations.

The fraudulent inducement to join Twitch's streaming ecosystem is not mere "third-party content," but direct promotional content by Twitch, LinkedIn's promotional mechanisms, and Briasco-Stewart's personal statements.

26. Therefore, none of the Defendants may invoke Section 230 immunity for Plaintiff's fraud claim under California law.

VI CAUSE OF ACTION – FRAUD

(Cal. Civ. Code § 1572; §§ 1709–1710; Lazar v. Superior Court)

27. Plaintiff re-alleges and incorporates by reference each and every allegation set forth above in paragraphs 1 through 26 as though fully stated herein.

28. Defendants made material misrepresentations of fact—including but not limited to statements about credential storage, data security, and the long-term profitability and viability of streaming on Twitch—conveyed via Twitch's official communications, Briasco-Stewart's LinkedIn posts, and LinkedIn's algorithmic or editorial amplifications.

29. Defendants knew or should have known these representations were false or misleading when made. For instance, Twitch publicly references OAuth and claims not to store credentials in plaintext, while Briasco-Stewart's admission regarding a "plaintext credential checker" indicates either direct or potential plaintext handling—directly contradicting Twitch's public statements.

30. Defendants intended Plaintiff and the broader public to rely on these statements, and Plaintiff did in fact reasonably rely. Plaintiff devoted considerable resources, effort, and time in anticipation of building a secure streaming presence and professional credibility.

31. As a proximate result of these misrepresentations, Plaintiff suffered damages including, but not limited to, lost time, monetary expenses, investigative costs, emotional distress, and other consequential harm, to be proven at trial.

VII PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff and against Defendants TWITCH INTERACTIVE, INC., SAMANTHA BRIASCO-STEWART, and LINKEDIN CORPORATION as follows:

A. For compensatory damages according to proof at trial;
B. For special and consequential damages in an amount to be determined at trial;
C. For punitive or exemplary damages under Cal. Civ. Code § 3294;
D. For costs of suit and reasonable attorneys' fees, as permitted by law;
E. For pre-judgment and post-judgment interest as permitted by law; and
F. For such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

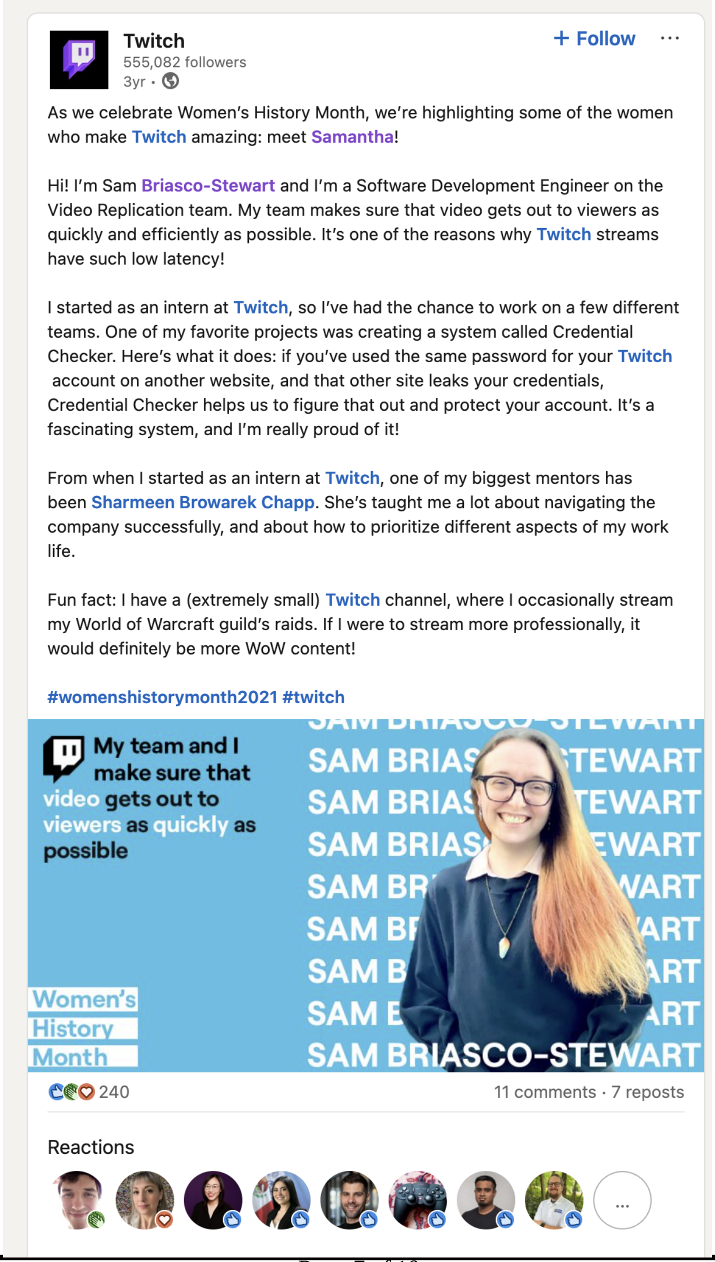
Plaintiff hereby demands a jury trial on all causes of action so triable at law.

Dated: ____2/15/2025______

BO SHANG, Pro Se
Resident of Massachusetts
Phone: 781-999-4101
Email: enigmatictyphoon@gmail.com

EXHIBIT 1: Twitch and Samantha Briasco-Stewart, via Linkedin's suggestion algorithms intentionally designed to promote both "legally blonde" and "application security blonde" among numerous other types of blondes, claims that Twitch and erosolar built a "Credential Checker" system, when Twitch also publicly claims that they follow dumbass-standards (industry standards) of an asymetrric encryption system in their log-in OAuth flow.

It's not mathematically possible for Twitch to alert users of plaintext leaks, unless Samantha Briasco-Stewart wanted to run a while loop on leaked FBI plaintext passwords, and see if they hash collide onto any of the hashed login authorizations Twitch publicly claims to use.



Twitch
555,082 followers
3yr •

As we celebrate Women's History Month, we're highlighting some of the women who make Twitch amazing: meet Samantha!

Hi! I'm Sam Briasco-Stewart and I'm a Software Development Engineer on the Video Replication team. My team makes sure that video gets out to viewers as quickly and efficiently as possible. It's one of the reasons why Twitch streams have such low latency!

I started as an intern at Twitch, so I've had the chance to work on a few different teams. One of my favorite projects was creating a system called Credential Checker. Here's what it does: if you've used the same password for your Twitch account on another website, and that other site leaks your credentials, Credential Checker helps us to figure that out and protect your account. It's a fascinating system, and I'm really proud of it!

From when I started as an intern at Twitch, one of my biggest mentors has been Sharmeen Browarek Chapp. She's taught me a lot about navigating the company successfully, and about how to prioritize different aspects of my work life.

Fun fact: I have a (extremely small) Twitch channel, where I occasionally stream my World of Warcraft guild's raids. If I were to stream more professionally, it would definitely be more WoW content!

#womenshistorymonth2021 #twitch

My team and I make sure that video gets out to viewers as quickly as possible
Women's History Month
SAM BRIASCO-STEWART

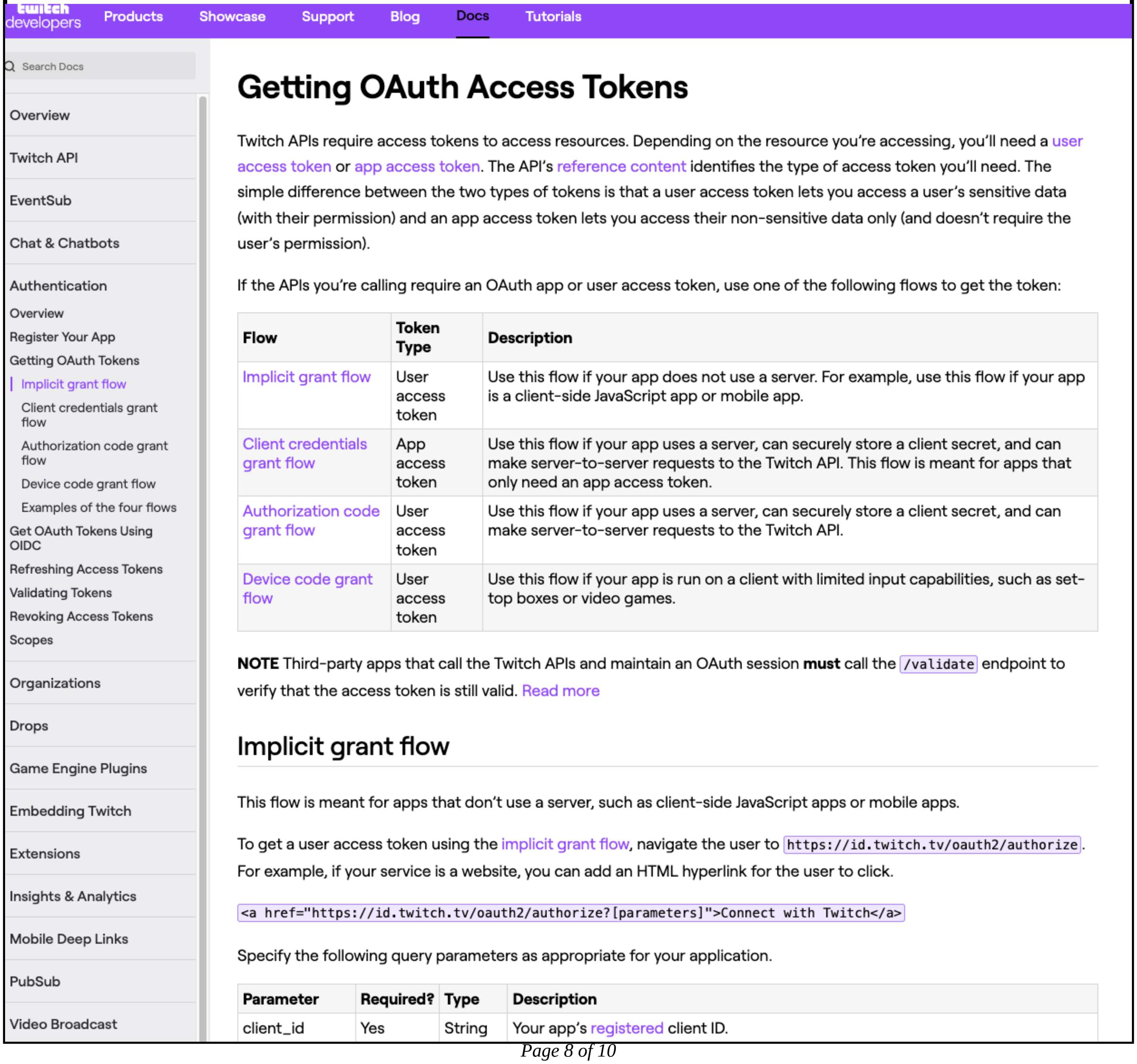
240

11 comments · 7 reposts

Reactions

PDFSage Inc.

EXHIBIT 2: Twitch on dev.twitch.tv claims to utilize asymettric OAuth2 for log in, making erosolar's Credential Checker mathematically impossible to implement. In contrast Apple KeyChain stores plaintext because it's a password manager, and thus is able to alert users of detected leaks. The Plaintiff theorizes that not many blondes, but most likely still enough blondes, work application security at Apple.



Getting OAuth Access Tokens

Twitch APIs require access tokens to access resources. Depending on the resource you're accessing, you'll need a user access token or app access token. The API's reference content identifies the type of access token you'll need. The simple difference between the two types of tokens is that a user access token lets you access a user's sensitive data (with their permission) and an app access token lets you access their non-sensitive data only (and doesn't require the user's permission).

If the APIs you're calling require an OAuth app or user access token, use one of the following flows to get the token:

Flow	Token Type	Description
Implicit grant flow	User access token	Use this flow if your app does not use a server. For example, use this flow if your app is a client-side JavaScript app or mobile app.
Client credentials grant flow	App access token	Use this flow if your app uses a server, can securely store a client secret, and can make server-to-server requests to the Twitch API. This flow is meant for apps that only need an app access token.
Authorization code grant flow	User access token	Use this flow if your app uses a server, can securely store a client secret, and can make server-to-server requests to the Twitch API.
Device code grant flow	User access token	Use this flow if your app is run on a client with limited input capabilities, such as set-top boxes or video games.

NOTE Third-party apps that call the Twitch APIs and maintain an OAuth session **must** call the `/validate` endpoint to verify that the access token is still valid. Read more

Implicit grant flow

This flow is meant for apps that don't use a server, such as client-side JavaScript apps or mobile apps.

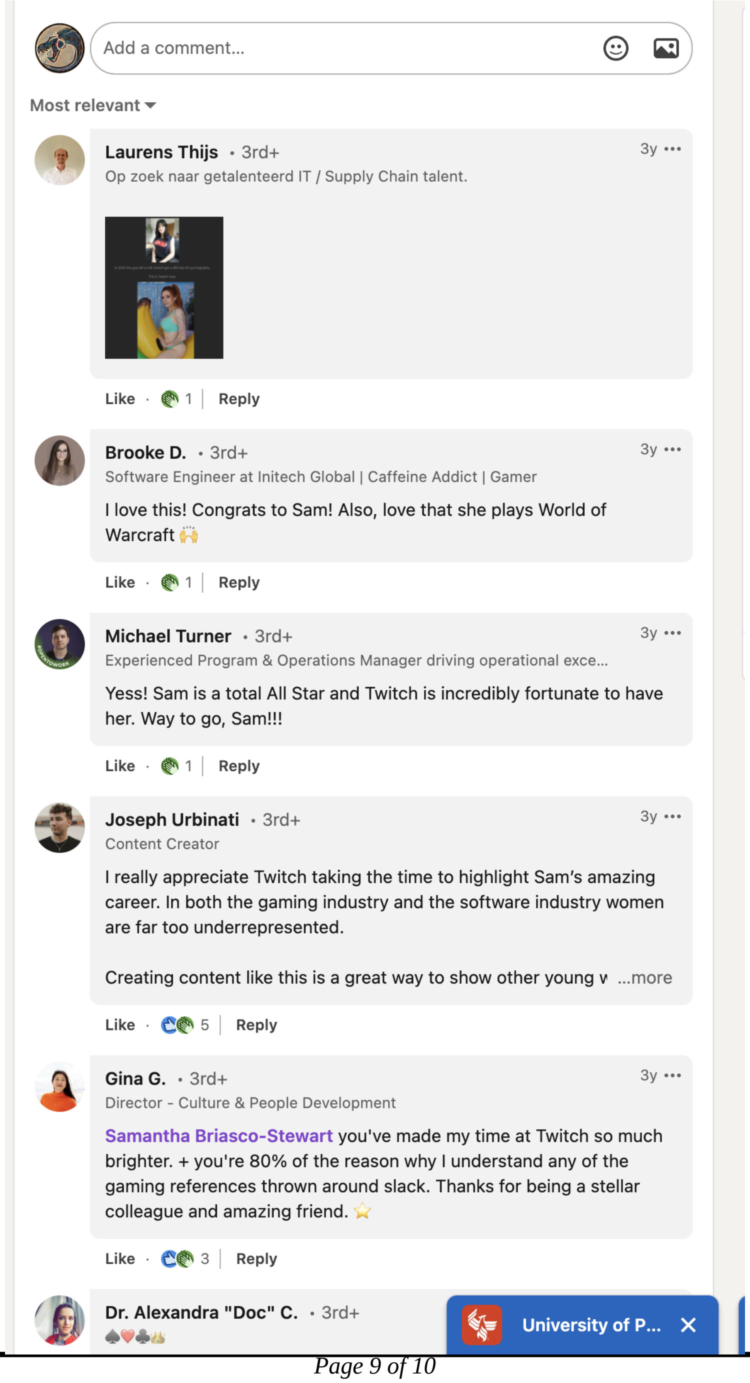
To get a user access token using the implicit grant flow, navigate the user to `https://id.twitch.tv/oauth2/authorize`. For example, if your service is a website, you can add an HTML hyperlink for the user to click.

```
<a href="https://id.twitch.tv/oauth2/authorize?[parameters]">Connect with Twitch</a>
```

Specify the following query parameters as appropriate for your application.

Parameter	Required?	Type	Description
client_id	Yes	String	Your app's registered client ID.

EXHIBIT 3: Linkedin comments and likes are entirely from blondes, who didn't even catch the first thing anyone ever learns in cryptography. While the Plaintiff knew about asymettric vs symettric encryption before enrolling in Discrete Mathematics at Tufts, one assignment was to fully explain and code the real RSA protocol, which is the only fundamental asymmetric encryption foundational piece that exist today. While more complex systems such as PGP encryption, as this court may be well aware of when browsing servers hosted via the onion protocol, PGP could not work without using RSA. PGP private and public keys are in fact RSA based, and PGP simply makes the system more user friendly for humans.



Add a comment…

Most relevant

Laurens Thijs · 3rd+ 3y ···
Op zoek naar getalenteerd IT / Supply Chain talent.

Like · 1 | Reply

Brooke D. · 3rd+ 3y ···
Software Engineer at Initech Global | Caffeine Addict | Gamer

I love this! Congrats to Sam! Also, love that she plays World of Warcraft 🙌

Like · 1 | Reply

Michael Turner · 3rd+ 3y ···
Experienced Program & Operations Manager driving operational exce…

Yess! Sam is a total All Star and Twitch is incredibly fortunate to have her. Way to go, Sam!!!

Like · 1 | Reply

Joseph Urbinati · 3rd+ 3y ···
Content Creator

I really appreciate Twitch taking the time to highlight Sam's amazing career. In both the gaming industry and the software industry women are far too underrepresented.

Creating content like this is a great way to show other young w …more

Like · 5 | Reply

Gina G. · 3rd+ 3y ···
Director - Culture & People Development

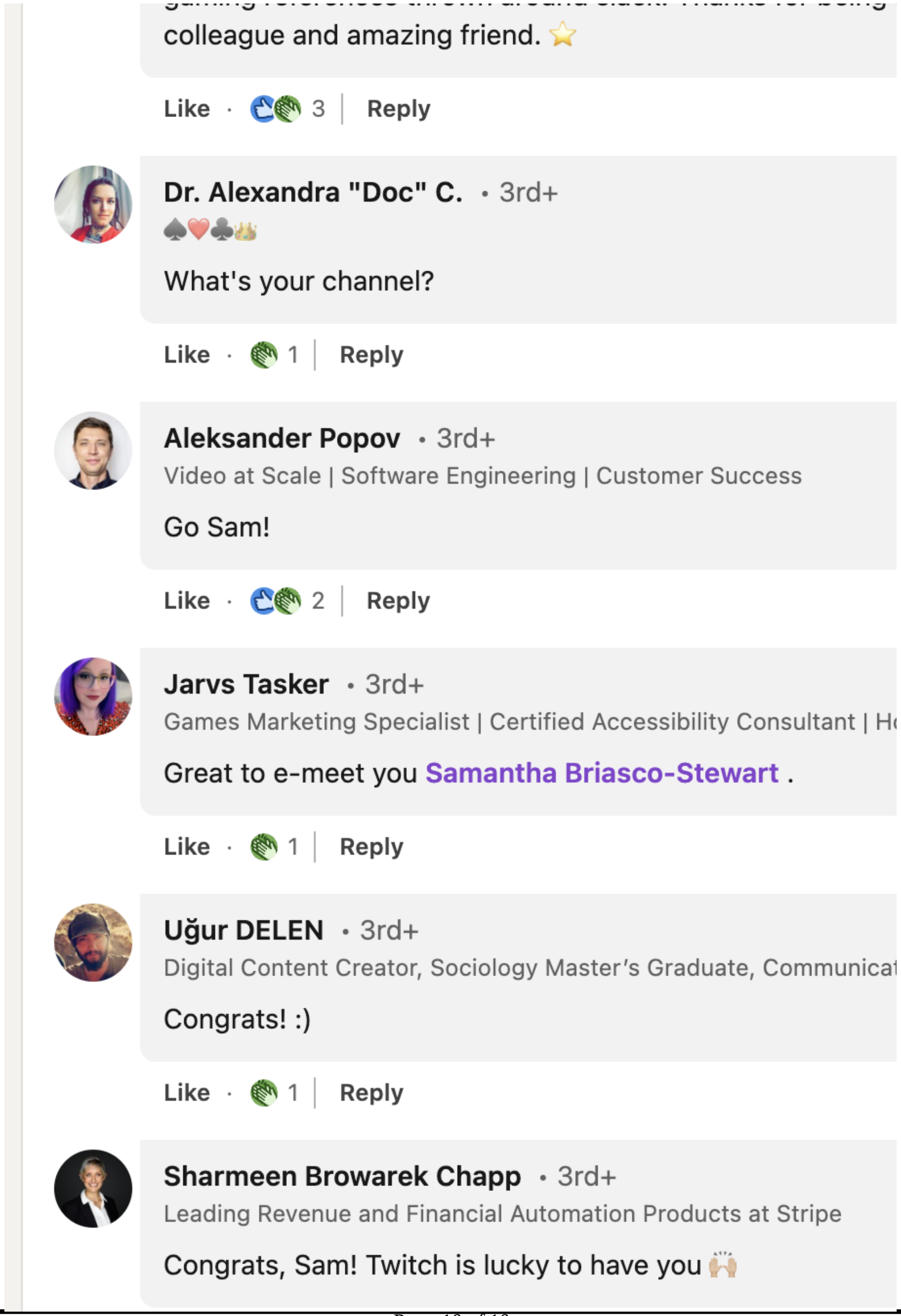
Samantha Briasco-Stewart you've made my time at Twitch so much brighter. + you're 80% of the reason why I understand any of the gaming references thrown around slack. Thanks for being a stellar colleague and amazing friend. ⭐

Like · 3 | Reply

Dr. Alexandra "Doc" C. · 3rd+
♠♥♣👑

University of P… ✕

EXHIBIT 4: Linkedin's comments are filled with even more blondes, including Sharmeem whom the Defendant Ms. Briasco-Stewart mentioned as having mentored the Defendant at Twitch. Only the Plaintiff was smart enough to make a sarcastic comment in this article. Everyone else basically called the Defendant an all star for not understanding basic math then lying to everyone about her work.



gaming references thrown around slack. Thanks for being
colleague and amazing friend. ⭐

Like · 👍👏 3 | Reply

Dr. Alexandra "Doc" C. • 3rd+
♠❤♣👑

What's your channel?

Like · 👏 1 | Reply

Aleksander Popov • 3rd+
Video at Scale | Software Engineering | Customer Success

Go Sam!

Like · 👍👏 2 | Reply

Jarvs Tasker • 3rd+
Games Marketing Specialist | Certified Accessibility Consultant | H

Great to e-meet you **Samantha Briasco-Stewart** .

Like · 👏 1 | Reply

Uğur DELEN • 3rd+
Digital Content Creator, Sociology Master's Graduate, Communicat

Congrats! :)

Like · 👏 1 | Reply

Sharmeen Browarek Chapp • 3rd+
Leading Revenue and Financial Automation Products at Stripe

Congrats, Sam! Twitch is lucky to have you 🙌