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22 **UNITED STATES DISTRICT COURT**
23 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
24 **SAN FRANCISCO DIVISION**

25 AREEJ AL-SADHAN, and ABDULRAHMAN
26 AL-SADHAN, an Incompetent, by his Sister and
27 Next Friend AREEJ AL-SADHAN,

28 Plaintiffs,

-against-

TWITTER, INC., KINGDOM OF SAUDI
ARABIA, SAUD AL-QAHTANI, AHMAD
ABOUAMMO, ALI ALZABARAH, AHMED
ALMUTAIRI a/k/a AHMED ALJBREEN,
BADER AL-ASAKER, SAUDI ARABIAN
CULTURAL MISSION, and JOHN DOES 1-10.

Defendants.

Case No.:

**COMPLAINT FOR DAMAGES
AND DECLARATORY RELIEF
UNDER THE CIVIL
RACKETEERING
INFLUENCED ACT AND ALIEN
TORT STATUTE**

DEMAND FOR JURY TRIAL

1 “[Transnational repression] is most often portrayed as a feature of America’s enemies,
 2 even as authoritarian allies of the United States have become increasingly emboldened in
 their efforts to curtail rights and freedoms abroad.”

- 3 - The Freedom Initiative, In the Shadows of Authoritarianism, Egyptian and
 4 Saudi Transnational Repression in the U.S. (2023).

5 “Twitter gave my brother’s identifying information to the government of Saudi Arabia,
 6 which blatantly violates its terms and conditions. This puts every Twitter user at risk. As
 7 a result, Saudi Arabia kidnapped, tortured, imprisoned, and—through a sham trial—
 8 sentenced my brother to 20 years in prison, simply for criticizing Saudi repression on his
 9 Twitter account. The Saudi government has since denied him contact with his family or
 access to his attorney. I am not sure if he is alive. After I began to speak out against Saudi
 repression, my life became a living hell.”

- 10 - Plaintiff Areej Al-Sadhan Affidavit, Exhibit 1.

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1 Plaintiffs Areej Al-Sadhan, by and through her undersigned counsel, and Abdulrahman Al-
2 Sadhan, an incompetent, by and through his sister and next friend, Areej Al-Sadhan, for their
3 Complaint, allege as follows:

4 **PRELIMINARY STATEMENT**

5 1. Plaintiff Areej Al-Sadhan, a U.S. citizen, is an activist speaking out about the
6 disappearance and torture of her brother, Plaintiff Abdulrahman Al-Sadhan, who resided and
7 studied in the United States for several years, in Saudi Arabia. Plaintiff Abdulrahman was
8 kidnapped, tortured, and imprisoned for operating an anonymous Twitter account critical of the
9 government of the Kingdom of Saudi Arabia (“Defendant KSA”). Plaintiff Abdulrahman’s family
10 has not heard from him since 2021. Because of Plaintiff Areej’s advocacy, Plaintiff Areej has
11 been targeted by Defendant KSA and its agents, including non-party Prime Minister and Crown
12 Prince Mohammed bin Salman (“MBS”), as well as Defendants John Does 1-10.

15 2. The racketeering enterprise in this suit is a group of individuals and entities with
16 the shared goal of transnational repression (the “Saudi Criminal Enterprise”). The Saudi Criminal
17 Enterprise seeks to extend Defendant KSA’s authoritarian control beyond Saudi Arabia’s borders,
18 including by reaching into U.S.-based businesses and commerce, and stifling discourse critical of
19 Defendant KSA and the Saudi royal family around the world. The members of the Saudi Criminal
20 Enterprise unlawfully surveilled, killed, tortured, disappeared, kidnapped, extorted, and threatened
21 perceived dissidents to suppress speech globally and to export terror and repression into the
22 world’s democracies, including within the United States.

25 3. Most infamously, several members of the Saudi Criminal Enterprise lured Jamal
26 Khashoggi, a U.S. Person within the meaning of Section 105A(c) of the National Security Act of
27 1947 and a former Washington Post columnist critical of Defendant KSA, to the Saudi Consulate

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1 in Istanbul, under the guise of issuing papers necessary for his then-impending marriage. Once
2 Khashoggi entered the consulate, members of the Saudi Criminal Enterprise tortured, executed,
3 and dismembered him on the orders of non-party MBS, disposing of his body in a way to ensure
4 that many of its parts would never be found.

5 4. The Saudi Criminal Enterprise has since targeted numerous supposed dissidents,
6 including Plaintiffs Areej and Abdulrahman, by infiltrating the United States market, accessing
7 Defendant Twitter's confidential data on its users with assistance from two of Defendant Twitter's
8 own employees, and supplying that data to Defendant KSA to target and retaliate against its critics,
9 by kidnapping, torturing, imprisoning, and killing perceived dissidents.
10

11 5. Defendant Twitter—which was once the chosen platform for Arab youth
12 revolutionizing to liberate their countries from despotic leadership during the Arab Spring—
13 enabled its co-conspirators in the Saudi Criminal Enterprise to crush that very dissent, and then
14 even permitted Defendant KSA to enjoy an equity stake in Defendant Twitter through its private
15 investment funds.
16

17 6. The conspiracy and malign activities of the Saudi Criminal Enterprise came to light
18 when the United States Department of Justice indicted three of its members. In November 2019,
19 the United States Attorney's Office for the Northern District of California revealed that Defendants
20 KSA, Ahmed Almutairi, and Bader Al-Asaker recruited two California-based employees of
21 Defendant Twitter to the Saudi Criminal Enterprise.¹ The employees, Defendants Ahmad
22 Abouammo and Ali Alzabarah, exploited their access to Defendant Twitter's data to advance the
23 Saudi Criminal Enterprise's goal of transnational repression. They transmitted the confidential
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26

27 ¹ See Exhibits 2, 3.

1 names behind anonymous user accounts, which Defendant Saud Al-Qahtani had identified for
2 them at non-party MBS's direction. These accounts belonged to voices critical of the Saudi royal
3 family and Defendant KSA's policies. Plaintiff Abdulrahman's name was among the roughly
4 6,000 users whose personally identifying information Defendant Twitter provided to Defendants
5 KSA, Alzabarah, and Almutairi and non-party MBS.

6
7 7. In 2018, Plaintiff Abdulrahman, a target of the Saudi Criminal Enterprise,
8 disappeared. Plaintiff Areej and her family were devastated, helpless, and fearful for her brother's
9 safety. For two years, Plaintiff Areej did not know where he was or if he was alive. Plaintiff Areej
10 did what she could—she spoke out loudly against Defendant KSA. After Plaintiff Areej's activism
11 brought international pressure on Defendant KSA and highlighted how Plaintiff Abdulrahman was
12 arbitrarily detained without charges against him, Defendant KSA brought baseless allegations
13 against him—primarily related to his U.S.-based, protected speech on Twitter—in a sham trial
14 before sentencing him to 20 years in prison, with the principal purpose of silencing Plaintiff Areej
15 and others who challenged Defendant KSA.
16

17
18 8. Today, Plaintiff Areej is once again in the dark about the fate of her brother, and
19 she is now herself a target the Saudi Criminal Enterprise's conspiracy. Its members have stalked
20 her openly and with impunity. They have harassed her online and threatened her and her brother's
21 lives. They have held her brother hostage, lording their control over him to keep her silent. She
22 has taken leaves of absence from work, missing promotion opportunities, to ensure that she and
23 her family remain safe and healthy and to advocate for her brother. She remains constantly vigilant
24 and must craft travel plans to reduce the risk of being kidnapped, incurring heavy financial and
25 psychosocial tolls. Plaintiff Areej suffers daily as a target of the Saudi Criminal Enterprise, in
26 what she can only describe as a “living nightmare.”
27

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5

COMPLAINT – DEMAND FOR JURY TRIAL

1 9. The Saudi Criminal Enterprise’s pattern of unlawful racketeering to quell political
2 dissent, including by deploying confidential information for unlawful purposes and threatening
3 human life, violates the Racketeering Influenced and Corrupt Organizations Act (“RICO”).

4 10. The allegations in this Complaint are pled on information and belief throughout,
5 except to the extent certain allegations are verified by Plaintiff Areej’s affidavit (“Areej Aff.”).
6
7 See Exhibit 1.

8 **THE PARTIES**

9 **A. Plaintiffs**

10 11. **Plaintiff Abdulrahman Al-Sadhan**, an incompetent under Federal Rule of Civil
11 Procedure 17(c), is a humanitarian aid worker and citizen of Saudi Arabia. Plaintiff Abdulrahman
12 attended middle school in the United States and, after returning to Saudi Arabia for a few years,
13 moved to the United States in or around 2008 to attend college. Plaintiff Abdulrahman then lived
14 in the United States for approximately six years. While living in the United States, Plaintiff
15 Abdulrahman created an anonymous Twitter account that he used to call out hypocrisy in
16 Defendant KSA and the royal family. Plaintiff Abdulrahman returned to Saudi Arabia in or around
17 2014. In March 2018, Plaintiff Abdulrahman was kidnapped by KSA secret police for operating
18 the anonymous Twitter account. Plaintiff Abdulrahman was last seen imprisoned in Saudi Arabia
19 but has not been heard from since 2021, when he was sentenced to 20 years in prison followed by
20 a 20-year travel ban. Because Plaintiff Abdulrahman is believed to be incarcerated in Saudi Arabia
21 and his family is unable to contact him, Plaintiff Abdulrahman is unable to assist counsel in the
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1 preparation of the case.² Further, due to the circumstances of his disappearance, caused by the
2 very conduct at the heart of this case, Plaintiff Abdulrahman lacks the practical and financial ability
3 to access American courts.

4 12. **Plaintiff Areej Al-Sadhan** is a United States citizen and a resident of San
5 Francisco, California where she works in project management for an American multinational
6 technology conglomerate that owns numerous social media platforms. She was born in
7 Washington State. Growing up, she lived in both Saudi Arabia and the United States before
8 settling in the United States. She has not returned to Saudi Arabia since early 2009. Plaintiff Areej
9 is a human rights activist campaigning against Defendant KSA’s oppression and to rescue her
10 brother from unlawful detention, torture, and disappearance in Saudi Arabia. It is because of her
11 advocacy against the Defendants that she became a direct target of the Saudi Criminal Enterprise.
12 Plaintiffs Areej and Abdulrahman are siblings and always enjoyed a close emotional bond and
13 were in contact regularly until Plaintiff Abdulrahman disappeared. Up until the time that Plaintiff
14 Abdulrahman was kidnapped, and despite living across the world from each other, Plaintiffs Areej
15 and Abdulrahman spoke to each other a few times per week to check in with each other, tell each
16 other that they missed the other, and discuss work opportunities and share advice. Plaintiff Areej
17 deeply misses her brother every single day. Plaintiff Areej is also the next friend of Plaintiff
18 Abdulrahman and is dedicated to pursuing her brother Plaintiff Abdulrahman’s best interests in
19 this litigation.³

24
25 ² *AT&T Mobility, LLC v. Yeager*, 143 F. Supp. 3d 1042, 1050 (E.D. Cal. 2015) (“In California, a
26 party is incompetent if he or she . . . is unable to assist counsel in the preparation of the case.”).

27 ³ *Jurgens v. Dudendorf*, No. 2:14-cv-2780, 2015 WL 4910536, at *2 (E.D. Cal. Aug. 17, 2015)
28 (permitting “next friend standing” where the next friend shows “(1) an adequate explanation . . .
why the real party in interest cannot appear on his own behalf to prosecute the action, and

1 **B. Members of the Saudi Criminal Enterprise**

2 13. **Defendant Twitter, Inc.** is a Delaware corporation with its principal place of
 3 business located in San Francisco, California. Defendant Twitter owns and operates a free-access
 4 social-networking website of the same name that can be accessed at <http://www.twitter.com>.
 5 Defendant Twitter is a member of the Saudi Criminal Enterprise whose employees—in their roles
 6 at Defendant Twitter—accessed and sent confidential account data to members of the Saudi
 7 Criminal Enterprise. Defendant Twitter has more than 10 million users in KSA, making KSA its
 8 most important market in the Middle East.⁴ Moreover, Defendant KSA has been heavily invested
 9 in Defendant Twitter throughout the period of the conspiracy.
 10
 11

12 a. In 2011, Saudi Prince Alwaleed Bin Talal’s private investment firm
 13 Kingdom Holding Company (“KHC”) invested \$300 million in Defendant
 14 Twitter. On May 22, 2022, Bin Talal sold 16.87% of KHC to the sovereign
 15 wealth fund of Defendant KSA, the Saudi Public Investment Fund, for \$1.5
 16 billion.
 17

18 b. As of October 28, 2022, KHC owned approximately 35 million shares,
 19 valued at \$1.89 billion, in Defendant Twitter. KHC is the second largest
 20 shareholder of Defendant Twitter behind Elon Musk.
 21

22 _____
 23 (2) dedication to the best interests of the person on whose behalf he seeks to litigate.” (internal
 quotation marks omitted)).

24 ⁴ See Exhibit 4 (“This crackdown began, in part, on Twitter, which is used by approximately 10
 25 million people in Saudi Arabia, making it the service’s largest Middle Eastern market. . . . After a
 26 brief honeymoon of unfettered speech, pro-regime trolls and surveillance emerged on the site. Now
 27 as popular with members of the Saudi ruling family as the public, Twitter is no longer a place where
 ordinary Saudis feel comfortable speaking freely. Much the same could be said of Saudi dissidents
 and exiles, who talk of constant harassment, death threats, and attempts to hack their accounts. In
 their view, Twitter bears some responsibility for how its service has been abused.”).

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1 14. **Defendant KSA** is a nation in the Arabian Peninsula with an embassy located in
2 the United States. Defendant KSA, through its agents, directed individuals to reside in or enter
3 the United States and recruit employees of Defendant Twitter, then deployed those employees in
4 the U.S. market through Defendant Twitter in aid of transnational repression, including by
5 accessing and transmitting confidential personal information of Twitter users.
6

7 15. **Defendant Saud Al-Qahtani** is a citizen of Saudi Arabia who has served as a
8 trusted adviser to non-party MBS and was considered his enforcer. He coordinated Defendant
9 KSA’s access and transmittal of Twitter users’ confidential data and helped develop Defendant
10 KSA’s online anti-dissent strategy. Non-party MBS personally gave Defendant Al-Qahtani the
11 mission and resources to suppress critical or embarrassing social media content with an “electronic
12 army” of media posters. Defendant Al-Qahtani is a member of the Saudi Criminal Enterprise. In
13 August 2017, Defendant Al-Qahtani posted an ominous warning against anonymous critics of
14 Defendant KSA using his own verified Twitter account asserting that Defendant KSA could access
15 personal information through various means.⁵
16
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18 16. **Defendant Ahmad Abouammo** is a dual citizen of the United States and Lebanon.
19 While working at Defendant Twitter, he resided in Walnut Creek, California from at least
20 November 4, 2013 until May 22, 2015, and then resided in Seattle, Washington. Defendant
21 Abouammo is a member of the Saudi Criminal Enterprise and a former employee of Defendant
22 Twitter. Defendant Abouammo transmitted Twitter users’ confidential account data to members
23 of the Saudi Criminal Enterprise.
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27 ⁵ See Exhibit 5.

1 17. **Defendant Ali Alzabarah** is a citizen of Saudi Arabia. Defendant Alzabarah
2 worked at Defendant Twitter and resided in San Bruno, California from at least August 12, 2013
3 until December 3, 2015. Defendant Alzabarah is a member of the Saudi Criminal Enterprise and
4 transmitted Twitter users’ confidential account data to members of the Saudi Criminal Enterprise.
5 Defendant Alzabarah, before he began working for Defendant Twitter, was a recipient of a
6 scholarship from Defendant KSA through Defendant Saudi Arabian Cultural Mission (“SACM”).
7

8 18. **Defendant Ahmed Almutairi a/k/a Ahmed Aljbreen** is a citizen of Saudi Arabia.
9 He was present in the United States between approximately August 2014 and May 2015.
10 Defendant Almutairi is a member of the Saudi Criminal Enterprise and an agent of Defendant
11 KSA. Defendant Almutairi helped recruit Defendants Abouammo and Alzabarah and facilitated
12 their transmissions of confidential account data from California.
13

14 19. **Defendant Bader Al-Asaker** is Secretary General of non-party MBS’s non-profit
15 organization, the Mohammed bin Salman Foundation (“MISK Foundation”). The MISK
16 Foundation is non-party MBS’s personal multi-billion-dollar foundation operating under his
17 control and direction. The MISK Foundation, as part of its cultural “programming” in Saudi
18 Arabia and abroad, supports Defendant SACM and its scholars in the United States by funding
19 and organizing student events across U.S. school campuses. The MISK Foundation also has
20 ongoing business with a technology company, Samaat, founded by Defendant Almutairi.
21 Defendant Al-Asaker is a member of the Saudi Criminal Enterprise. He helped recruit and pay
22 Defendants Abouammo and Alzabarah to transmit Twitter users’ confidential account data to the
23 Saudi Criminal Enterprise.
24
25

26 20. **Defendant SACM** is a U.S.-based entity. Since at least 2013, Defendant SACM
27 has been headquartered in Fairfax, Virginia. Defendant SACM’s ostensible purpose is to
28

1 administer KSA-funded scholarships for Saudi students to study in the United States.⁶ To advance
2 the illegal and malign activities of the Saudi Criminal Enterprise, Defendant KSA leverages
3 Defendant SACM to surveil, stalk, and harass dissidents in the United States. Defendant SACM's
4 Committee for Support and Oversight monitors and reports on dissident student activities back to
5 other members of the Saudi Criminal Enterprise. Defendant SACM engages in transnational
6 repression by encouraging scholarship students to target and harass other Saudi students in the
7 United States if they criticize Defendant KSA.⁷

9 21. The Saudi Criminal Enterprise has other members, who joined the racketeering
10 enterprise as co-conspirators, including **Defendants John Does 1-10**.

11 22. Most notable among the non-party conspirators is non-party MBS, the Prime
12 Minister and Crown Prince of Saudi Arabia. At his direction, Defendant KSA's secret police and
13 other foreign agents have repressed political dissent by kidnapping, disappearing, torturing, killing,
14 and terrorizing Saudi Arabian and foreign citizens. Most infamously, as the U.S. Office of the
15 Director of National Intelligence found, "Saudi Arabia's Crown Prince Muhammad bin Salman
16 approved an operation in Istanbul, Turkey to capture or kill Saudi journalist Jamal Khashoggi."⁸

22 ⁶ See, e.g., Exhibit 6 ("Figures obtained from the Office of International Affairs show that 83
23 percent of Saudi Arabian students at [Portland State University] received scholarship funding from
24 the Saudi Arabian Cultural Mission in fall 2015.").

25 ⁷ See Exhibit 7 ("... [P]rosecutors say Ibrahim Alhussayen, 42, who was studying at a Mississippi
26 university on a scholarship funded by the Saudi Royal Court and Saudi Cultural Mission, used the
27 @samar16490 Instagram account to harass Saudi Arabian citizens in the US and Canada who were
28 known critics of their government. Most of the alleged victims are women.").

⁸ See Exhibit 8.

1 Non-party MBS also directed Defendants Abouammo and Alzabarah to access the confidential
2 account data of Twitter users who were critical of Defendant KSA.⁹

3 23. The Saudi Criminal Enterprise conspired to quell speech, activism, and the lawful
4 petitioning of government representatives in the United States. It conscripted a U.S. corporation,
5 Defendant Twitter, into the conspiracy to obtain access to confidential personal information of the
6 corporation's customers. The Saudi Criminal Enterprise then used that information to attack
7 political dissidents, including U.S. residents, citizens, and green card holders on U.S. soil and
8 abroad.
9

10 24. The common goal of the Saudi Criminal Enterprise is transnational repression.
11 Transnational repression is the strategy through which an authoritarian regime controls freedoms
12 beyond its own borders to protect its power at home.¹⁰ Transnational repression can be carried out
13 in many ways, including by wrongfully detaining, physically or digitally surveilling, harassing,
14 threatening, or taking hostage critics of the state.¹¹ The goal of transnational repression is to
15 intimidate and chill political and social dissenters from voicing their criticism or otherwise
16 exercising their fundamental civil and human rights.
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21 ⁹ The U.S. District Court for the District of Columbia held that non-party MBS was immune from
22 prosecution for the Khashoggi murder under the Head of State immunity doctrine, a finding that
23 was supported by the Biden Administration. *See Cengiz v. Salman*, No. 20-3009, 2022 WL
17475400, at *4-7 (D.D.C. Dec. 6, 2022).

24 ¹⁰ *See* Exhibit 9 at 14 (“Transnational repression is not the mere exacting of violence beyond
25 national borders, but a mode of governance: To the modern authoritarian state, borders extend to
26 the body of the furthest subject they can reach, or presenting even more complex challenges, to
the behaviors, speech or criticisms that may form outside of their own sovereign control.”).

27 ¹¹ *See id.* at 6-8 (listing various forms of transnational repression carried out by Defendant KSA in
the United States).

1 25. Here, each member of the Saudi Criminal Enterprise participated in a conspiracy to
2 chill anti-authoritarian advocacy by, among other conduct, unlawfully obtaining personally
3 identifying information of political dissidents to identify and target them and kidnapping, torturing,
4 stalking, harassing, threatening, and killing other political dissidents. The conspiracy repeatedly
5 violated U.S. laws and terrorized political dissidents in the United States and abroad. Plaintiffs
6 Areej and Abdulrahman are two of many victims of the conspiracy.
7

8 **JURISDICTION AND VENUE**

9 26. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 because
10 the action arises under the Racketeer Influenced and Corrupt Organizations Act (“RICO”) of 1970,
11 Pub. L. 91–45, 84 Stat. 922 (codified at 18 U.S.C. § 1962 et seq.), and the Alien Tort Statute, 18
12 U.S.C. § 1350.
13

14 27. Venue is properly laid in the Northern District of California pursuant to 28 U.S.C.
15 § 1391(b)(2) because a substantial part of the events giving rise to the claims set forth herein
16 occurred in this District. Alternatively, venue is proper pursuant to 28 U.S.C. § 1391(b)(3) because
17 there is no district in which this action may otherwise be brought and because Defendants are
18 subject to the Court’s personal jurisdiction with regard to this action.
19

20 **DIVISIONAL ASSIGNMENT**

21 28. San Francisco is the appropriate division because a substantial part of the events
22 giving rise to the claims set forth herein occurred in this Division.
23

24 **FACTUAL ALLEGATIONS**

25 **A. Background: Defendant Twitter and the Arab Spring**

26 29. Social media and the Internet have become borderless and ubiquitous tools of
27 political organization and speech. The rise of the Internet age has strained the power of
28

1 authoritarian regimes to suppress dissent and control speech. Previously, dissenters were largely
2 within arm's reach, inside a state's borders under its oppressive police state. Now, undesirable
3 speech can originate from foreign countries and reach the state with a mere click.

4 30. In 2010, the Arab Spring roiled the Arab world, unseating brutal dictators while
5 promising liberal reform. The Arab Spring was a series of anti-government protests, uprisings,
6 and armed rebellions that spread across much of the Arab world beginning in the early 2010s,
7 challenging authoritarian regimes. Young people largely built this grassroots movement on
8 Defendant Twitter's platform, often using aliases to protect themselves and family as they
9 organized and voiced their anger.
10

11 31. Anonymity was a shield to protect protestors against authoritarian repression.
12 During the Arab Spring, Defendant Twitter empowered such persons, allowing them to use
13 "pseudonymous accounts, meaning an account's profile is not required to use the name or image
14 of the account owner."¹² Defendant Twitter described itself as being from the "free speech wing
15 of the free speech party."¹³ But, unfortunately, Defendant Twitter became a participant tool of
16 transnational repression to silence voices of dissent beyond Saudi Arabia's borders in the United
17 States and abroad, all in an effort to monetize its commercial relationship with Defendant KSA.
18

19 32. The fair inferences from the evidence and allegations stated below demonstrate that
20 Defendant Twitter's participation in the racketeering activity was either knowing or based on its
21 conscious avoidance and/or deliberate indifference to the criminality occurring within Defendant
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25

26 ¹² See Exhibit 10.

27 ¹³ See Exhibit 11.

1 Twitter as it abetted acts of murder, kidnapping, and torture.¹⁴ Indeed, press accounts of Defendant
2 KSA’s official, malign activities utilizing Defendant Twitter began to circulate as early as 2018,¹⁵
3 and, as early as 2015, the FBI visited Defendant Twitter’s headquarters to inform them of a “Saudi
4 espionage problem.”¹⁶ Despite being warned of dangerous activity occurring on its platform,
5 Defendant Twitter only finally banned Defendant Al-Qahtani on or about September 20, 2019,
6 well after his malign activities had been revealed and after much of the damage had been done,
7 including to Plaintiff Abdulrahman.¹⁷

9 **B. The Pattern of Racketeering Activity**

10 33. Defendant Twitter is a commercial enterprise. According to public filings, during
11 the period of the racketeering activity, on average, Defendant Twitter was worth an estimated
12 \$10.2 billion, generated \$2.8 billion in advertising revenue, and enjoyed a market cap of \$24.3
13 billion. Defendant KSA has a commercial relationship with Defendant Twitter, which is used to
14 advance the goals of the Saudi Criminal Enterprise.

15 34. Among other aspects of the commercial relationship, Defendant KSA took
16 advantage of Defendants Abouammo’s and Alzabarah’s status as employees at Defendant Twitter
17 to obtain user data. Defendant KSA has used Defendant Twitter to advance its tourism.¹⁸

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22 ¹⁴ See *United States v. Jewell*, 532 F.2d 697, 700 (9th Cir. 1976) (“[D]eliberate ignorance and
23 positive knowledge are equally culpable.”).

24 ¹⁵ See, e.g., Exhibit 12.

25 ¹⁶ Exhibit 4.

26 ¹⁷ See Exhibit 13 (“Qahtani, a close confidante of Crown Prince Mohammed bin Salman, ran the
27 royal court’s media center as well as an electronic army tasked with protecting the kingdom’s
28 image and attacking its perceived enemies online.”).

¹⁸ See Exhibit 14.

1 Defendant KSA has been a longtime investor in Defendant Twitter and is currently its second-
2 largest shareholder.¹⁹ That commercial relationship is at the heart of Defendant Twitter's
3 participation in the Saudi Criminal Enterprise.

4 35. The Saudi Criminal Enterprise first unlawfully obtained and transferred thousands
5 of Twitter users' personal and confidential data over a seven-month period in 2014 and 2015. The
6 conspiracy principally targeted anonymous Twitter users who posted critical or embarrassing
7 information about Defendant KSA and the Saudi royal family. With that anonymity breached due
8 to the malign activities of Defendant Twitter, the Saudi Criminal Enterprise put a target on the
9 backs of those users, betraying the trust the users had placed in Defendant Twitter. The Saudi
10 Criminal Enterprise has since attacked, harassed, detained, tortured, and abducted persons whose
11 identifying information was exposed.
12

13
14 36. Plaintiff Abdulrahman was among the conspiracy's victims. He was kidnapped
15 from Red Crescent Society, his place of work in Saudi Arabia, and for two years was detained
16 without representation or communication with his family, tortured, and kept in solitary
17 confinement; then, a year later, he was put through a sham trial and sentenced to decades of
18 imprisonment. His fate today is unknown.
19

20 37. When Plaintiff Areej tried to save her brother by speaking out, she became a target
21 of the Saudi Criminal Enterprise. Because she dared call out Defendant KSA's history of
22 repression, petition her U.S. representatives to help her brother, and condemn the Saudi Criminal
23 Enterprise's kidnapping, torture, forced disappearance, and baseless charges against her brother,
24

25
26
27 ¹⁹ See Exhibit 15.

1 the Saudi Criminal Enterprise has stalked, harassed, threatened, and intimidated Plaintiff Areej
2 and wielded the familial bond of love for her brother against her.

3 **1. Racketeering Acts 1 to 30,892: The Saudi Criminal Enterprise Accessed**
4 **Confidential Identifying Data from Defendant Twitter.**

5 38. In 2014, Defendants Abouammo and Alzabarrah were employees of Defendant
6 Twitter in California.²⁰ During their employment, they accessed confidential user data, such as
7 identifying information on thousands of Twitter users, and sent this data to Defendant KSA,
8 including information on Plaintiff Abdulrahman. Defendants Abouammo and Alzabarrah were
9 recruited by Defendant Al-Asaker. Defendant Almutairi then coordinated Defendants Abouammo
10 and Alzabarrah's activities while they used their positions at Defendant Twitter to fraudulently
11 transmit confidential information to Defendant KSA.
12

13 39. Defendant Twitter hired Defendant Abouammo as a Media Partnerships Manager
14 responsible for the Middle East and North Africa region. He began working at Defendant Twitter
15 on November 4, 2013, while residing in California.
16

17 40. On or around May 16, 2014, a representative of a U.S.-Saudi Arabian trade
18 organization in Washington D.C. asked Defendant Abouammo to help arrange a tour for a
19 delegation of "entrepreneurs" from Saudi Arabia to Defendant Twitter's headquarters in
20 California. Defendant Abouammo acceded. The visit occurred on or around June 13, 2014, with
21 Defendant Al-Asaker and other employees of the Saudi royal family. During that meeting,
22 Defendants Almutairi and Al-Asaker discussed the goals of the Saudi Criminal Enterprise.
23
24
25
26

27 ²⁰ See Exhibit 2 (The criminal indictment in *United States v. Abouammo*, No. 19-cr-621 (N.D.
28 Cal.), includes information related to the racketeering acts alleged in this Section B.1.).

1 41. Later that year, on or around November 15, 2014, Defendant Almutairi emailed
2 Defendant Abouammo. He requested an “urgent meeting” to discuss their “mutual interest.” They
3 met in San Francisco near Defendant Twitter’s headquarters. During that meeting, Defendants
4 Almutairi and Abouammo discussed the goals of the Saudi Criminal Enterprise.

5 42. Defendants Almutairi and Abouammo continued to communicate by phone and
6 email in late 2014 to coordinate a meeting with Defendant Al-Asaker. Defendant Al-Asaker and
7 Defendant Abouammo met on December 5, 2014 in London. At the meeting, Defendant Al-
8 Asaker gave Defendant Abouammo a watch worth at least \$20,000. During that meeting,
9 Defendants Al-Asaker and Abouammo discussed the goals of the Saudi Criminal Enterprise.
10

11 43. After the meeting on December 5, 2014, Defendant Abouammo began sending
12 confidential data to Defendant KSA officials. Defendant Abouammo sent Defendant Al-Qahtani
13 a message on Twitter proclaiming, “proactively and reactively we will delete evil, my brother,” a
14 reference to the goal of the Saudi Criminal Enterprise to identify and harm perceived dissidents.
15

16 44. Defendant Abouammo resigned from his position at Defendant Twitter in May
17 2015, but Defendant Al-Asaker continued to ask Defendant Abouammo to refer requests to
18 Defendant Twitter for confidential information on users.
19

20 45. To continue and carry on the conspiracy, on or around February 2015, Defendant
21 Abouammo introduced Defendant Almutairi to Defendant Alzabarah. Defendant Alzabarah had
22 been working at Defendant Twitter since August 2013 as a Site Reliability Engineer. He was
23 responsible for maintaining Defendant Twitter’s hardware and software.
24

25 46. In May 2015, Defendant Alzabarah met with Defendant Almutairi in Fairfax,
26 Virginia, at a SACM-related property. Defendant Al-Asaker orchestrated the meeting. After the
27

1 meeting, Defendant Alzabarah returned to San Francisco, where Defendant Alzabarah, like
2 Defendant Abouammo, began accessing and transmitting confidential Twitter user data.

3 47. On May 29, 2015, over the course of approximately three hours, Defendants Al-
4 Asaker and Alzabarah exchanged three phone calls and Defendant Alzabarah accessed Twitter
5 user data of two users. That same day, Defendant KSA submitted emergency disclosure requests
6 to Defendant Twitter for those same two user accounts.

7
8 48. Defendant Alzabarah took personal leave and traveled to Saudi Arabia in July and
9 August 2015. During that time, Defendant Alzabarah accessed nonpublic account information of
10 hundreds of Twitter users, including on July 29, 2015, when Defendant Alzabarah connected his
11 laptop issued by Defendant Twitter to Defendant Almutairi's company's wireless local area
12 network in Saudi Arabia. Despite Defendant Alzabarah taking leave and traveling to Saudi Arabia,
13 Defendant Twitter allowed him to access sensitive and private user data for non-work-related
14 purposes and did not disable his access.

15
16 49. From January to at least November 2015, Defendant Abouammo (from January to
17 May) and Defendant Alzabarah (from May to November) accessed and disclosed confidential user
18 data at least 30,892 times.

19
20 50. While these events were ongoing, Defendant KSA was simultaneously negotiating
21 to increase its equity stake in Defendant Twitter. The efforts culminated an announced increase
22 in Defendant KSA's equity stake to over 5% on October 7, 2015, double its prior stake.²¹

23
24 51. In late 2015, U.S. intelligence agencies informed Defendant Twitter that Defendant
25 Alzabarah had sent data to Defendant KSA that Defendant Alzabarah had been able to access in

26
27 ²¹ See Exhibit 16.

1 the course of his employment. On December 2, 2015, Defendant Alzabarah tried to contact
2 Defendant Almutairi and then contacted Defendant Al-Asaker, who quickly coordinated
3 Defendant Alzabarah's departure from the United States with the Saudi Arabian consulate in Los
4 Angeles, California. The next day, Defendant Alzabarah flew to Saudi Arabia and resigned from
5 Defendant Twitter.

6
7 52. Over the course of the conspiracy, Defendant Al-Asaker and other members of the
8 Saudi Criminal Enterprise sent Defendants Abouammo and Alzabarah the names of Twitter users
9 posting criticism of Defendant KSA and the Saudi royal family. Defendants Abouammo and
10 Alzabarah unlawfully transmitted back the names, birthdates, device identifiers, phone numbers,
11 IP addresses, and session IP histories associated with these accounts.
12

13 53. Each time they accessed this user data, they committed a racketeering act in aid of
14 the Saudi Criminal Enterprise's goal of transnational repression. Each of the 30,892 accesses
15 occurred close in time to the prior access—either within minutes, hours, or days, and occasionally
16 weeks, and was part of the same conspiracy to uncover anonymous Twitter users.
17

18 54. With this user data, Defendant KSA could identify critics of the government who
19 had anonymous accounts and silence them. Among many other accounts, the conspirators
20 identified Plaintiff Abdulrahman's @sama7ti account and provided its information, including his
21 name, to Defendant KSA.
22

23 55. From January 2015 to November 2015, Defendants Abouammo and Alzabarah
24 transmitted personally identifying information of nearly 6,000 Twitter user accounts to Defendant
25 KSA, including the names of persons behind at least 33 accounts that Defendant KSA had asked
26 Defendant Twitter to disclose.
27

1 56. Six months later, despite Defendant Twitter knowing full well Defendant KSA’s
2 malign activities and various crimes, Defendant Twitter’s CEO Jack Dorsey met with non-party
3 MBS and reportedly discussed how the two could cooperate to “train and qualify Saudi cadres.”²²

4 57. Among the exposed account users were (i) Plaintiff Abdulrahman, (ii) Ali Al-
5 Ahmed, who resides on asylum in the United States, (iii) Omar Abdulaziz, who resides on asylum
6 in Canada, (iv) Turki bin Abdulaziz Al-Jasser, who was reportedly arrested and tortured while
7 imprisoned in Saudi Arabia, and (v) an account operated by the well-known whistleblower of
8 Defendant KSA, Mujtahid. Each of these individuals had posted criticism or information critical
9 of members of the Saudi Criminal Enterprise.
10

11 58. A fundamental purpose of the conspiracy was to gather intelligence on anonymous
12 Twitter users critical of Defendant KSA and the Saudi royal family so that the Saudi Criminal
13 Enterprise could terrorize and punish people into silence. The campaign to silence dissent was
14 done by threatening, harassing, kidnapping, torturing, and killing political dissenters at home and
15 abroad, and indirectly by creating an example of such persons.
16

17 59. Defendants Abouammo and Alzabarah, while they were employees of Defendant
18 Twitter, received cash, gifts, and promises from the head of non-party MBS’s affairs and operator
19 of non-party MBS’s foundation. Defendant Abouammo received over \$300,000, and Defendant
20 Alzabarah, after fleeing the United States, received a lucrative position at the MISK Foundation.
21
22
23
24
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26

27 ²² See Exhibit 17.

1 60. Defendants Almutairi, Al-Asaker, and Al-Qahtani were acting at non-party MBS’s
 2 direction. Defendant Almutairi told Defendant Abouammo that he was working on behalf of and
 3 advising a “very important” member of the Saudi royal family. Defendant Almutairi, in May 2015,
 4 posted a photo with non-party MBS and met with his representatives in Washington, D.C.



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 11
 12
 13 61. Defendant Al-Asaker personally advised non-party MBS. Defendant Al-Qahtani
 14 held a seat on the board of directors of the MISK Foundation and also advised non-party MBS.

15
 16 62. On November 19, 2019, the U.S. Attorney’s Office of the Northern District of
 17 California indicted Defendants Abouammo, Alzabarah, and Almutairi. The charges were made
 18 public on or around November 7, 2019.²³ The U.S. Attorney’s Office filed a superseding
 19 indictment on July 28, 2020, charging them with acting as an agent of a foreign government
 20 without notice, wire fraud, money laundering, and falsifying records. Only Defendant Abouammo
 21

22
 23
 24
 25
 26
 27 ²³ See Exhibit 3.

1 was arrested; Defendants Alzabarah and Almutairi are believed to be in Saudi Arabia.²⁴ Defendant
 2 Abouammo was convicted on August 9, 2022, and subsequently sentenced.²⁵

3 63. In total, the Saudi Criminal Enterprise, through the collective efforts of all the
 4 Defendants, unlawfully accessed and transmitted confidential Twitter user data 30,892 times.²⁶
 5 Each access and transmittal constituted a separate racketeering act in violation of 18 U.S.C.
 6 §§ 1028(a)(7), 1029(a)(7).
 7

8 **2. Racketeering Acts 30,893 to 30,895: The Saudi Criminal Enterprise**
 9 **Kidnapped, Tortured, and Conspired to Kill Plaintiff Abdulrahman.**

10 64. In 2011, while living in the United States, Plaintiff Abdulrahman created his
 11 anonymous Twitter account @sama7ti that called out hypocrisy in Defendant KSA and the royal
 12 family. His account was known for its scorching and entertaining sarcasm. Over several years,
 13 he built a substantial following. But he, like many others, kept his account anonymous to avoid
 14 reprisal from Defendant KSA.
 15

16 65. The Saudi royal family was a frequent subject of his tweets. Through his @sama7ti
 17 account, Plaintiff Abdulrahman tweeted, for example, political cartoons and commentary featuring
 18 non-party MBS, issues of gas prices and taxes, and other topical stories and critique.
 19

20 66. Plaintiff Abdulrahman also retweeted dissident journalists and activists in Saudi
 21 Arabia, including Turki bin Al-Jasser (@coluche_ar) and Omar Abdulaziz (@say_it_and_walk
 22
 23

24 ²⁴ See Exhibit 3.

25 ²⁵ Defendant Abouammo was convicted based on conduct that forms the basis of Racketeering
 26 Acts 1 through 30,892, and thus—with respect to those acts—principles of res judicata apply in
 relation to this action.

27 ²⁶ See Exhibit 18 (Tr. Ex. No. 352, *United States v. Abouammo*, 19-CR-0621, N.D. Cal. July 26,
 28 2022).

1 and @i5beearmy). Today, only Abdulaziz, who is in exile in Canada, still tweets. Al-Jasser is
2 missing, reported as being held at the Al Ha'ir prison in Riyadh.

3 67. Plaintiff Abdulrahman returned to Saudi Arabia in 2014. After returning, Plaintiff
4 Abdulrahman tweeted less, focusing instead on his humanitarian work for the Red Crescent
5 Society, where he was employed, while trying to keep a low profile. But that was all for naught
6 because the Saudi Criminal Enterprise had already targeted Plaintiff Abdulrahman. The Saudi
7 Criminal Enterprise knew that Plaintiff Abdulrahman was behind the anonymous @sama7ti
8 Twitter account as a result of the Saudi Criminal Enterprise's access to Defendant Twitter's
9 confidential files on its users.²⁷

10
11 68. Plaintiff Abdulrahman was 34 years old when he was kidnapped from his office at
12 the Red Crescent Society. It was March 12, 2018, and Plaintiff Areej and her family could not
13 reach him. Before Plaintiff Abdulrahman disappeared, Plaintiff Areej's family and Plaintiff
14 Abdulrahman spoke daily. The next day, messages, emails, and phone calls stopped going
15 through.
16

17
18 69. Plaintiff Areej began to panic. She checked with her family who was residing in
19 Saudi Arabia, but nobody knew where her brother was.

20 70. Plaintiff Abdulrahman's coworker at the Red Crescent Society told the family that
21 Plaintiff Abdulrahman was taken by Defendant KSA's secret police, the State Security Presidency.
22

23 ²⁷ Defendant Twitter's privacy policy, effective 2015, states in relevant part: "We may share or
24 disclose your non-private, aggregated or otherwise non-personal information, such as your public
25 user profile information, public Tweets, the people you follow or that follow you, or the number
26 of users who clicked on a particular link (even if only one did), or reports to advertisers about
27 unique users who saw or clicked on their ads after we have removed any private personal
28 information (such as your name or contact information)." Another provision of the policy states
that Twitter will preserve user information "if we believe that it is reasonably necessary . . . to
protect the safety of any person." See Exhibit 19.

1 71. On March 13, 2018, neighbors observed men in police uniforms break into Plaintiff
2 Abdulrahman’s house and leave with a laptop and personal belongings. Plaintiff Abdulrahman
3 had been taken to an unknown location. He had not been shown any arrest warrant.

4 72. Plaintiff Areej, with her family, hoped that the government had only taken Plaintiff
5 Abdulrahman to ask a few questions and that he would be released. Her family contacted the
6 secret police, but the police denied holding Plaintiff Abdulrahman or knowing where he was.
7 Plaintiff Abdulrahman’s name did not appear in searches of any of the government’s online prison
8 databases.
9

10 73. After a month, a government clerk responded to a request from a member of
11 Plaintiff Areej’s family—Plaintiff Abdulrahman was in the “system,” the clerk said, and under
12 investigation. The clerk would give no information about where he was held. Nor was Plaintiff
13 Areej, or anyone, allowed to communicate with Plaintiff Abdulrahman. The clerk said they could
14 request a phone call or visit, but that a visit would not be permitted, and, even if it were, it could
15 be “after years, not months.”
16

17 74. Plaintiff Areej’s family submitted three more requests to see or speak with Plaintiff
18 Abdulrahman—in April, August, and October 2018. On the fourth request, they were told that
19 “there is no point of you calling us and you should just stop and wait until we respond to you.” To
20 this day, Plaintiff Areej and her family’s requests have been ignored.
21

22 75. Plaintiff Areej and her family were not entirely in the dark. They received
23 information from inside sources. They were told that Plaintiff Abdulrahman was seen by co-
24 detainees in Dhahban prison in Jeddah—a prison known for torturing its inmates. They called
25 Dhahban but were told to speak with the Presidency of State Security. On November 25, 2018, the
26
27

1 National Society for Human Rights informed Plaintiff Abdulrahman’s family that Plaintiff
2 Abdulrahman had been transferred to Al Ha’ir prison in Riyadh.

3 76. Plaintiff Areej eventually learned that Defendant KSA’s secret police broke
4 Plaintiff Abdulrahman’s hand and smashed his fingers, taunting him that “this is the hand you
5 write and tweet with.” The secret police also tortured Plaintiff Abdulrahman with electric shocks,
6 flogged and hung him from his feet, suspended him in contorted positions, deprived him of sleep,
7 threatened to behead him, insulted him, and kept him in solitary confinement for years.

9 77. The Saudi Criminal Enterprise’s activities constituted unlawful racketeering acts of
10 kidnapping Plaintiff Abdulrahman, in violation of Cal. Penal Code § 207(a), and torturing and
11 conspiring to kill Plaintiff Abdulrahman, in violation of Cal. Penal Code §§ 187, 189.

13 **3. Racketeering Acts 30,896 to 30,898: Conspiracy to Kidnap, Torture,
14 and Kill Omar Abdulaziz and Other Exposed Twitter Users.**

15 78. Omar Abdulaziz is a Twitter user whose account information, like Plaintiff
16 Abdulrahman’s, was exposed in the Saudi Criminal Enterprise’s conspiracy. Between April and
17 June 2017, Abdulaziz was approached by an agent of non-party MBS to persuade Abdulaziz to
18 return to Saudi Arabia. In mid-May 2018, two KSA agents told Abdulaziz that non-party MBS
19 was not pleased with his online criticism but that if Abdulaziz stopped criticizing KSA and
20 returned to Saudi Arabia, he would have a bright future there.

22 79. The Saudi Criminal Enterprise targeted him because he posted criticism of
23 Defendant KSA and the Saudi royal family on Twitter, including Defendant KSA’s human rights
24 abuses. Had Abdulaziz returned to Saudi Arabia, as the Saudi Criminal Enterprise’s agents urged,
25 Abdulaziz would have been kidnapped, tortured, and killed. The Saudi Criminal Enterprise’s
26

1 activities constituted unlawful racketeering acts of conspiring to kidnap, torture, and kill
2 Abdulaziz, in violation of Cal. Penal Code §§ 187, 189, 207(a).

3 80. The Saudi Criminal Enterprise has similarly conspired to kidnap, torture, and kill
4 other persons among the nearly 6,000 exposed Twitter users. Persons were targeted because they
5 posted criticism of Defendant KSA, non-party MBS, or the Saudi royal family.
6

7 81. In addition to Abdulaziz, alleged above, at least five other instances of documented
8 kidnappings—including of Plaintiff Abdulrahman—occurred close in time to the transmittal of
9 Twitter’s private user data, according to the executive director of the Arabic Network for Human
10 Rights Information. The kidnappings in those five instances were a result of the Saudi Criminal
11 Enterprise’s access to confidential data illegally disclosed by Defendant Twitter.
12

13 82. The Saudi Criminal Enterprise has conspired to or in fact kidnapped, tortured, and
14 killed numerous others among the 6,000 exposed individual Twitter accounts, in violation of Cal.
15 Penal Code §§ 187, 189, 207(a). The Saudi Criminal Enterprise’s campaign to terrorize perceived
16 political dissidents is continuing and ongoing. The Saudi Criminal Enterprise continues to use
17 confidential data illegally disclosed by Defendant Twitter.
18

19 **4. Racketeering Acts 30,899 to 30,905 and Continuing: The Saudi Criminal**
20 **Enterprise Stamped Out Other Dissenting Voices in the United States and**
21 **Abroad Through Criminal Activity.**

22 83. Beginning in 2017—around the time Plaintiff Abdulrahman was abducted—the
23 Saudi Criminal Enterprise’s campaign to crush undesirable speech escalated. Having obtained
24 confidential information illegally disclosed by Defendant Twitter, members of the Saudi Criminal
25 Enterprise began to harass, threaten, kidnap, torture, and kill exposed users. These users and others
26 whom the Saudi Criminal Enterprise have targeted in its conspiracy continue to face threats from
27

1 the Saudi Criminal Enterprise. The Saudi Criminal Enterprise’s illegal activity and assault on
2 speech and democracies worldwide shows no signs of abating.

3 84. In addition to the exposed Twitter users, the Saudi Criminal Enterprise has targeted
4 numerous other perceived dissidents. These dissidents spoke out publicly against the repressive
5 regime in Saudi Arabia and the Saudi Criminal Enterprise punished them for it.
6

7 **a. Racketeering Acts 30,899 to 30,901: Kidnapping, Torturing,
8 and Killing Jamal Khashoggi.**

9 85. Jamal Khashoggi was a United States-based columnist for the Washington Post.
10 He was well-known for his reporting and advocacy on democratic reform in the Arab world. He
11 challenged the Saudi Criminal Enterprise, which surveilled Khashoggi, waiting to strike.

12 86. In October 2017, non-party MBS’s senior lieutenant, Defendant Al-Qahtani, called
13 Khashoggi in the United States. Defendant Al-Qahtani made thinly veiled threats on the call. The
14 plan to kill Khashoggi then began at the Saudi Embassy in Washington, D.C., where Defendant
15 KSA lured Khashoggi to travel to Istanbul, Turkey to obtain necessary documents.
16

17 87. The United States-based KSA ambassador falsely told Khashoggi that he would be
18 safe during his travels. Khashoggi was tortured and killed at the Saudi Consulate in Istanbul. Non-
19 party MBS directed and ordered the execution.
20

21 88. The Saudi Criminal Enterprise’s activities constituted unlawful racketeering acts of
22 kidnapping, torturing, and killing Khashoggi, in violation of Cal. Penal Code §§ 187, 189, 207(a).
23

24 **b. Racketeering Acts 30,902 to 30,904: Conspiracy to Kidnap,
25 Torture, and Kill Saad Aljabri.**

26 89. On or around October 2018, non-party MBS sent members of the Saudi Criminal
27 Enterprise known as the “Tiger Squad”—the same team that assassinated Khashoggi—to Canada
28

1 to kidnap, torture, and kill another person critical of his regime, Saad Aljabri. The Tiger Squad
2 entered Canada through the United States.

3 90. Aljabri is a former Saudi intelligence official who the Saudi Criminal Enterprise
4 believes defected and betrayed non-party MBS. In or around the spring of 2015—several years
5 before non-party MBS directed members of the Saudi Criminal Enterprise to locate and kill
6 Aljabri—non-party MBS implied to Aljabri that he had a covert agent inside Twitter who took
7 action to silence Twitter users critical of non-party MBS.
8

9 91. Prior to the attempted assassination, Defendant KSA deployed three members of
10 the Saudi Criminal Enterprise in the United States to gather information on Aljabri’s whereabouts
11 and habits to facilitate the attempt. The three members were affiliated with Defendant SACM in
12 the United States and participated in MISK-sponsored programming in the United States.
13

14 92. Two of his children were also taken hostage in Saudi Arabia because of Aljabri’s
15 dissident activities. On March 16, 2020, they were kidnapped in a raid by over fifty armed men
16 from their residence in Saudi Arabia and held incommunicado.
17

18 93. The Saudi Criminal Enterprise’s activities constituted unlawful racketeering acts
19 of conspiring to kidnap, torture, and kill Aljabri, in violation of Cal. Penal Code §§ 187, 189,
20 207(a).
21

22 **c. Racketeering Act 30,905: Kidnapping Saad Almadi.**

23 94. In 2021, the Saudi Criminal Enterprise kidnapped and detained Saad Almadi when
24 he visited Saudi Arabia. Almadi is a Saudi-American dual citizen who lived in Florida.

25 95. The Saudi Criminal Enterprise targeted him because he sent a tweet in 2015 that
26 non-party MBS “has taken over the economy, defense and everything under the king.” He received
27 a 16-year sentence—increased to 19 years after he appealed his sentence and his son petitioned
28

1 U.S. officials for help. Almadi was released from prison in March 2023 but is banned from leaving
2 Saudi Arabia.

3 96. The Saudi Criminal Enterprise’s activities constituted unlawful racketeering acts of
4 kidnapping Almadi, in violation of Cal. Penal Code § 207(a).

5 **C. Racketeering Acts 30,906 to 30,908: The Saudi Criminal Enterprise Stalks,
6 Threatens, Terrorizes, and Conspires to Kidnap, Torture, and Kill Plaintiff Areej.**

7 97. When Plaintiff Areej began speaking out against Defendant KSA to share what
8 happened to Plaintiff Abdulrahman, she raised her profile with the Saudi Criminal Enterprise. She
9 became a target of its conspiracy of transnational repression.
10

11 **1. The Saudi Criminal Enterprise Stalks and Threatens to “Throw Away”
12 Plaintiff Areej Like Her Brother After She Speaks Out.**

13 98. Plaintiff Abdulrahman was being held in a secret prison with others who had spoken
14 out against non-party MBS and the Saudi regime on Twitter. Saudi officials gloated about
15 obtaining confidential information from Defendant Twitter about Plaintiff Abdulrahman and the
16 other prisoners.

17 99. Plaintiff Areej began speaking out publicly against the Saudi Criminal Enterprise
18 and her brother’s unlawful disappearance.

19 100. Plaintiff Areej filed a complaint with the United Nations and shared details of her
20 concerns with many organizations, including the American Bar Association and human rights
21 groups MENA Rights Group, ALQST, the Freedom Initiative, Amnesty International, Human
22 Rights Watch, and Human Rights Foundation. Plaintiff Areej also petitioned the United States
23 Department of State and her local county and state representatives.
24

25 101. Around April 9, 2019, a woman activist publicly referenced Plaintiff Areej’s efforts
26 to shed light on her brother’s kidnapping. Plaintiff Areej received an influx of online threats,
27

1 frightening messages, and a phone call from Defendants John Doe 1-9, saying Defendant KSA
2 killed her brother and warning her that she and her family would meet the same fate.

3 102. In May 2019, Plaintiff Areej visited Oslo to attend the Oslo Freedom Forum hosted
4 by the Human Rights Foundation, where an agent of the Saudi Criminal Enterprise, Defendant
5 John Doe 10, threatened her. At 5:00 am on May 29, 2019, Plaintiff Areej was walking to the train
6 station in Oslo. When she left the hotel, she noticed a car parked across from the hotel with its
7 engine running.
8

9 a. The streets were empty, except for a man, Defendant John Doe 10, in a suit
10 walking parallel to her on the other side keeping the exact same pace as her
11 stride. Defendant John Doe 10 was speaking into a headset and staring
12 pointedly at her as she walked. Plaintiff Areej stopped a passerby, who she
13 asked to walk with her. The man continued to follow Plaintiff Areej.
14

15 b. When Plaintiff Areej and her companion had to part ways, Plaintiff Areej
16 decided that continuing to the train station was too dangerous. She turned
17 into the first building with security inside because she was fearful that
18 Defendant John Doe 10 was an agent of the Saudi Criminal Enterprise
19 tasked with following her. The moment she did, her fears were confirmed—
20 Defendant John Doe 10 yelled at her in Arabic with a Saudi accent, “Where
21 are you going?!”
22
23
24
25
26
27
28

1 103. Plaintiff Areej was rattled by being stalked but decided her only option was to be
 2 louder in protest. Plaintiff Areej began tweeting about her brother on her Twitter account
 3 @AreejASadhan. The account has since been a dedicated tool for her advocacy.
 4



17 104. Plaintiff Areej first began tweeting in March 2019, expressing frustration that her
 18 continued silence has made the situation with her brother worse. In April 2019, she tweeted: “. . . I
 19 will speak out of necessity, as silence has become more dangerous than speaking in an environment
 20 where speech is forbidden. I will tell you about the case of my brother[.]” In one early tweet, she
 21 asked: “. . . [A]fter a year of trying all possible methods that did not work . . . I no longer have
 22 any other choice. [W]here is my brother?”
 23

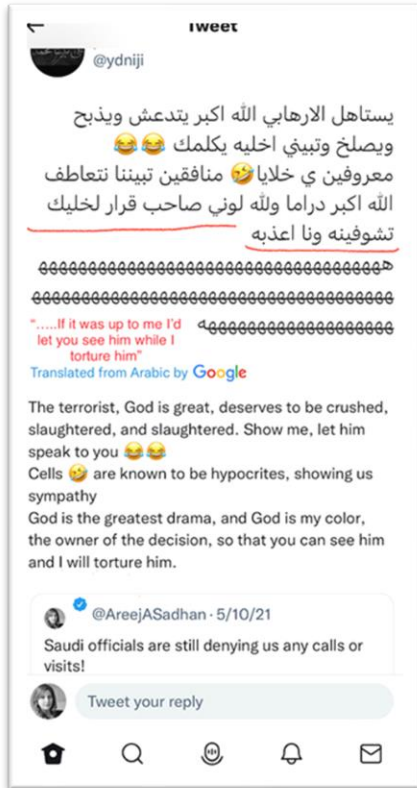
24 105. Since then, she has been tweeting and speaking out regularly about the Saudi
 25 Criminal Enterprise’s transnational repression of her brother. Immediately, she received threats
 26
 27
 28

1 to her life in response. Defendant John Doe 1, using the Twitter handle @9198Turky, replied to
 2 one tweet “God willing, it will be your turn.”



106. Other tweets, published on Twitter by Defendants John Does 2 through 9,
 107 threatened her life and sadistically taunted her: “In the sewer and you will follow him.” “Any
 108 word or trying to amplify opinion, you’ll regret it.” “If it was up to me I’d let you see him while
 109

I torture him.” The stream of threats from Defendant Al-Qahtani’s “digital army” has been unrelenting:



1 107. From the moment that Plaintiff Areej received the first threat, she knew that she
2 was in danger and that the Saudi Criminal Enterprise would try to silence her. Because of Plaintiff
3 Areej's public activism, United States officials and international organizations began pressuring
4 Defendant KSA to account for Plaintiff Abdulrahman's whereabouts and allow him to
5 communicate with his family.
6

7 108. Two years after Plaintiff Abdulrahman had vanished, in early 2020, the family
8 received its first call from Plaintiff Abdulrahman. Plaintiff Abdulrahman was allowed to speak
9 with a family member for one minute.

10 109. Plaintiff Abdulrahman told the family member that he was being held in Al Ha'ir
11 prison in Riyadh. The family member urged him to be strong and patient and said that the family
12 was praying for him.
13

14 110. A year passed before the family heard from Plaintiff Abdulrahman again. On
15 March 2, 2021, Plaintiff Abdulrahman called the family member. He shared positive news that
16 the prosecutors had told him he would be released from prison soon. Plaintiff Abdulrahman said
17 he felt hopeful and that he could not wait to see his family. Plaintiff Areej's family was excited
18 and happy and believed that his indefinite detention would soon be over—that he would be able
19 to return to his family.
20

21 **2. The Saudi Criminal Enterprise Holds Plaintiff Abdulrahman Hostage to**
22 **Terrorize Plaintiff Areej in Retaliation for Her Speech.**

23 111. Plaintiff Abdulrahman was not released. Instead, the Saudi Criminal Enterprise put
24 him through a sham trial and shattered his expectation and hope that he would soon be released
25 when they convicted and sentenced him to 20 years in prison followed by a 20-year travel ban.
26 Until Plaintiff Abdulrahman was sentenced, he and his family believed that he might return home.
27

1 No longer. Plaintiff Abdulrahman’s baseless conviction and resulting sentence conferred a
2 permanent injustice upon his life—he became a convicted person who would likely never be able
3 to return to work and, even if he could, his conviction would impose restrictions on employment
4 opportunities and have immigration consequences for work visas.

5
6 112. On March 3, 2021, the Saudi Criminal Enterprise reportedly presented the case in
7 secret before the Specialized Criminal Court (“SCC”) for a first hearing—approximately three
8 years after he had been detained. Plaintiff Abdulrahman had no legal representation and his family
9 members were denied access to the hearing. Plaintiff Areej followed these events from the United
10 States, awaiting updates from her family.

11
12 113. On March 4, 2021, Speaker Nancy Pelosi’s office received a call from Defendant
13 KSA’s Embassy. An Embassy official said that Abdulrahman was in “good health,” that his “arrest
14 and trial relate to a national security matter of transferring funds to problematic individuals
15 designated as terrorists,” and that he had been “appointed a lawyer and will receive due process
16 under Saudi law.” Plaintiff Abdulrahman’s “legal rights and health,” the Embassy official said,
17 “will always be guaranteed, and if there was a conviction there is a right to appeal.”
18

19 114. A week later, there was a second hearing. Plaintiff Abdulrahman received a court-
20 appointed lawyer, and a family member was finally allowed to see Plaintiff Abdulrahman. The
21 meeting happened within ear shot of security guards and lasted only five minutes.

22
23 115. Plaintiff Abdulrahman’s family member noticed that he had trouble walking and
24 focusing, his toenails were missing, his hand was mutilated, and his body showed other signs of
25 torture. Plaintiff Abdulrahman had spent five days in an ICU.

26 116. Plaintiff Abdulrahman was forced to sign confessions and evidentiary documents
27 blindfolded. And he had been threatened not to speak of the torture in court or he would receive

1 more. Plaintiff Abdulrahman’s legal representative was forced to remove details about torture
2 from Plaintiff Abdulrahman’s response in court.

3 117. The proceedings lasted one month. The public prosecutor presented as evidence
4 200 printed tweets from Plaintiff Abdulrahman’s account @Sama7ti—the same anonymous
5 account for which Defendant Twitter illegally disclosed confidential, personally identifying data
6 for Plaintiff Abdulrahman. Plaintiff Abdulrahman’s lawyer was allowed to review the Twitter
7 posts for less than an hour before they were introduced as evidence at the proceeding.
8

9 118. Over five hearings, Defendant KSA accused Plaintiff Abdulrahman of funding and
10 supporting terrorism and sending tweets that would prejudice the public order and religious values,
11 including the formal charge of “storing and sending what would prejudice public order and
12 religious values which is declared criminal and punishable under paragraph 1 of article 6 of Anti-
13 Cyber Crime Law issued by Royal Decree no. 17/M dated 08/03/1428 H through publishing tweets
14 on his Twitter accounts[.]” His tweets violated this law, the charges stated, because they were
15 allegedly “contempt[uous] of religion,” “adopting an extremist approach calling for the exclusion
16 of women and depriving them of the rights guaranteed to them by law,” and “offending state
17 institutions and officials and spreading false rumors about them.”
18

19 119. The Saudi Criminal Enterprise’s agenda was in the open: on April 5, 2021, Plaintiff
20 Abdulrahman was sentenced to 20 years in prison followed by a 20-year travel ban. Plaintiff Areej
21 had to watch her brother reappear, find hope, and be cruelly shut down.
22

23 120. After Plaintiff Abdulrahman was sentenced, and his sentence affirmed, he
24 disappeared once again. The family has had no contact with him since. His family has asked
25 government officials to speak with Plaintiff Abdulrahman many times but were either summarily
26 denied or ignored.
27

28 *Al-Sadhan, et. al. v. Twitter, Inc. et. al.*, No. _____

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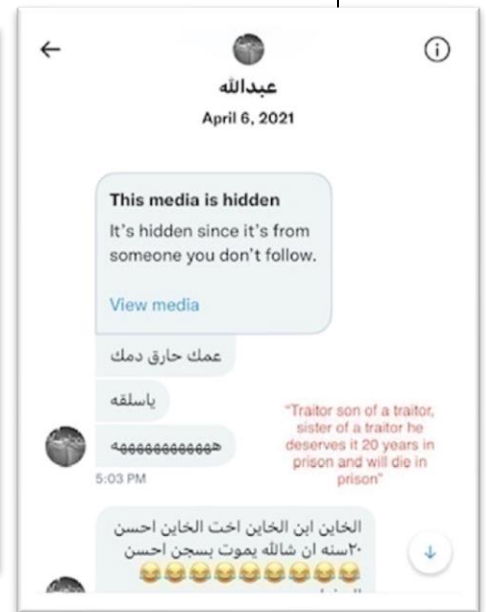
COMPLAINT – DEMAND FOR JURY TRIAL

1 **3. The Saudi Criminal Enterprise Again Stalks Plaintiff Areej and Threatens to**
2 **Kill Plaintiff Areej in Graphic and Violent Messages.**

3 121. Defendant KSA has offered no information about Plaintiff Abdulrahman—where
4 he is held, or if he is alive. Instead, the Saudi Criminal Enterprise continues to intimidate, taunt,
5 stalk, and threaten to kidnap, torture, and kill Plaintiff Areej and her family.

6 122. In October 2022, Ahmed Alobaid followed Plaintiff Areej while she was attending
7 a human rights event with the Freedom Initiative in Washington, D.C. An agent of the Saudi
8 Criminal Enterprise, Alobaid, who worked for the Saudi Ministry of Foreign Affairs, followed
9 Plaintiff Areej and her three companions, also human rights activists, to a restaurant. Alobaid
10 menaced Plaintiff Areej and her companions. Alobaid was sent to the restaurant by members of
11 the Saudi Criminal Enterprise to intimidate or track her whereabouts and activism.

12 123. The attacks from Defendant Al-Qahtani’s “digital army” have continued and
13 escalated. For example, Defendant John Doe 2 sent a Tweet on August 18, 2022, threatening to
14 “rape” Plaintiff Areej and “throw [her] head under MBS’s foot.” And on October 16, 2022: “Keep
15 barking in Twitter and you’ll get the fate of your brother, God willing.”
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1 124. The Saudi Criminal Enterprise’s activities constituted unlawful racketeering acts of
2 conspiring to kidnap, torture, and kill Plaintiff Areej, in violation of Cal. Penal Code §§ 187, 189,
3 207(a).

4 **D. The Saudi Criminal Enterprise’s Unlawful Activities Have Caused Plaintiff Areej to**
5 **Severely Suffer, Including By Losing Substantial Business Opportunities.**

6 125. The Saudi Criminal Enterprise’s conduct has caused Plaintiff Areej to take time
7 away from her employment to care for her health and advocate for her and her family’s safety and
8 her brother’s release. Plaintiff Areej’s efforts to combat the Saudi Criminal Enterprise’s threats,
9 stalking, and treatment of her brother have resulted in her losing countless opportunities at work
10 and the right to earn more.
11

12 126. Plaintiff Areej’s advocacy work against the human rights abuses by the Saudi
13 Criminal Enterprise is a second job and takes away from her ability to earn more at her primary
14 place of employment due to her inability to put in more work and focus on development projects,
15 which would likely have led to promotions and pay increases, and the need to take a leave of
16 absence, which was partially unpaid. But for the actions of the Saudi Criminal Enterprise and its
17 targeting of Plaintiff Areej and her brother, she would not have been deprived this right.
18

19 127. Since approximately 2020, Plaintiff Areej has devoted much of her focus and
20 energy toward traveling across the country and abroad to speak out against human rights abuses
21 by the Saudi Criminal Enterprise and for her safety and her brother’s release. The time that she
22 has spent advocating for her brother is time that she would have otherwise spent furthering her
23 career and pursuing employment opportunities. For example, in or around September 2019
24 through December 2019, Plaintiff Areej took a three-month leave to care for her health and safety
25 and to advocate for her brother. While she was on leave, Plaintiff Areej’s colleagues replaced her
26
27
28

1 on teams and projects. She could not complete projects that ultimately contributed to her peers—
2 who replaced Plaintiff Areej on those initiatives—being promoted within the company over her.
3 This has been a recurring experience. In order around late 2019, Plaintiff Areej took sick days and
4 time off to care for her health and to gain strength to advocate against the Saudi Criminal Enterprise
5 and for her brother’s release after receiving a message about his torture. As a result of Plaintiff
6 Areej’s leave of absences from work, Plaintiff Areej lost opportunities for professional
7 advancement and was replaced on projects that were integral to securing career progression within
8 her company.
9

10 128. Because of the time she has taken away from opportunities to develop her skills
11 and take leads on new initiatives, Plaintiff Areej has missed opportunities for promotions,
12 networking, and bonuses.
13

14 129. The Saudi Criminal Enterprise’s actions have impacted Plaintiff Areej’s ability to
15 work in other ways as well. For example, the incessant and gruesome messages that Plaintiff Areej
16 received from Defendant Al-Qahtani’s “digital army” have dissuaded her from leaving her house
17 and going to work. In one instance, after Plaintiff Areej received a message that her brother had
18 been killed, Plaintiff Areej was so devastated and fearful for her own safety if she left her house
19 that she had to request time off from work.
20

21 130. Plaintiff Areej every day bears the responsibility to protect herself and her family
22 from the Saudi Criminal Enterprise’s actions. They have failed, however, at silencing her. She
23 will continue to fight for human rights that the Saudi Criminal Enterprise seeks to diminish.
24

25 **E. The Saudi Criminal Enterprise’s Actions Are Continuous and Related.**

26 131. The fair inferences from the evidence and allegations stated herein demonstrate that
27 the Saudi Criminal Enterprise’s racketeering acts and behavior are related and continuous.
28

1 132. As described above, the racketeering acts have continued from 2015 through the
2 present and all involve the Saudi Criminal Enterprise’s efforts to engage in transnational
3 repression. For example, in 2014 and 2015, members of the Saudi Criminal Enterprise facilitated
4 the access of confidential Twitter user data and fraudulently transmitted it to Defendant KSA to
5 identify and target Defendant KSA’s political dissidents. Members of the Saudi Criminal
6 Enterprise then used Twitter data to conspire to kidnap, torture, and kill other exposed Twitter
7 users.
8

9 133. Members of the Saudi Criminal Enterprise have conspired and attempted to kidnap,
10 or in fact kidnapped, three additional U.S. citizens or residents:

- 11 a. In 2019, U.S. citizen Carly Morris was lured to Saudi Arabia, charged
12 baselessly, and detained in Saudi Arabia. She now faces a 10-year travel
13 ban. Morris was detained because she spoke out about Defendant KSA’s
14 oppressive male guardianship system.
15 b. In 2021, Anonymous No. 1, a Saudi citizen residing in the United States,
16 reported to the Freedom Initiative that an employee of Defendant KSA’s
17 embassy in Washington D.C. grabbed and pulled her towards the embassy
18 until she was able to break free.
19 c. In 2022, Anonymous No. 2, a dual United States-Saudi citizen, reported to
20 police that she had received a phone call from an individual aligned with
21 the Saudi government who threatened that “they,” the Saudi Criminal
22 Enterprise, could kidnap her and her child from the United States and
23 forcibly return them to Saudi Arabia “even though they were U.S. citizens.”
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1 134. In addition to these three U.S. residents and/or citizens, the Saudi Criminal
2 Enterprise’s transnational repression continues to threaten innocent individuals. Last year, Prince
3 Abdullah bin Faisal al Saud—a graduate student at Boston’s Northeastern University—was
4 arrested on a trip to Saudi Arabia after discussing his cousin’s imprisonment at the hands of
5 Defendant KSA. Prince Abdullah was sentenced to 30 years’ imprisonment in August 2022.
6

7 **FIRST CAUSE OF ACTION**

8 (RICO Conspiracy, 18 U.S.C. § 1962(d))

9 ***Plaintiffs Abdulrahman and Areej Against All Defendants***

10
11 135. Plaintiffs repeat and reallege the allegations in paragraphs 1-134 as if fully set forth
12 herein.

13 136. Each individual Defendant agreed and conspired to conduct and participate in the
14 conduct of the affairs of the Saudi Criminal Enterprise through a pattern of racketeering activity,
15 specifically:
16

17 a. Acts 1 to 30,892: Conspiracy to access and transfer nearly 6,000 third-party
18 users’ confidential personally identifying information 30,892 times from
19 Twitter users, including that of Plaintiff Abdulrahman and Omar Abdulaziz,
20 without the third-party users’ permission, to identify and target third-party
21 Twitter users who communicated and published political dissent of Defendant
22 KSA, in violation of 18 U.S.C. § 1028(a)(7).
23

24 b. Acts 1 to 30,892: Conspiracy to use modified telecommunications instruments
25 to obtain unauthorized access and use of nearly 6,000 third-party user accounts
26 with intent to defraud third-party Twitter users 30,892 times, including Plaintiff
27

1 Abdulrahman and Omar Abdulaziz, and affecting interstate commerce, in
2 violation of 18 U.S.C. § 1029(a)(7).

3 c. Acts 30,893 to 30,895: Conspiracy to kidnap Plaintiff Abdulrahman, in
4 violation of Cal. Penal Code § 207(a), and torturing and conspiring to kill
5 Plaintiff Abdulrahman, in violation of Cal. Penal Code §§ 187, 189.

6
7 d. Acts 30,896 to 30,898: Conspiracy to kidnap, torture, and kill Omar Abdulaziz,
8 in violation of Cal. Penal Code § 207(a) and Cal. Penal Code §§ 187, 189.

9 e. Acts 30,899 to 30,901: Conspiracy to kidnap, torture, and kill Jamal
10 Khashoggi, in violation of Cal. Penal Code § 207(a) and Cal. Penal Code
11 §§ 187, 189.

12
13 f. Acts 30,902 to 30,904: Conspiracy to kidnap, torture, and kill Saad Aljabri, in
14 violation of Cal. Penal Code § 207(a) and Cal. Penal Code §§ 187, 189.

15 g. Act 30,905: Conspiracy to kidnap Saad Almadi, in violation of Cal. Penal Code
16 § 207(a).

17
18 h. Acts 30,906 to 30,908: Conspiracy to kidnap, torture, and kill Plaintiff Areej,
19 in violation of Cal. Penal Code §§ 187, 189, 207(a).

20 137. Each individual Defendant knowingly engaged in and agreed to this pattern of
21 racketeering activity and agreed to the commission of multiple acts of statutory violations to
22 further their conspiracy to identify and target perceived political dissidents of Defendant KSA.

23
24 138. As a direct and proximate result of the Defendants' conspiracy, the racketeering
25 activities of their enterprise, the overt acts taken in furtherance of the conspiracy, and the violations
26 of 18 U.S.C. § 1962(d), Plaintiffs Abdulrahman and Areej have been severely harmed in their
27

1 property. Defendants’ activities have directly and proximately caused severe financial and
2 professional harms.

3 139. Plaintiffs Abdulrahman and Areej are entitled to damages, costs, and fees as
4 allowed by law.

5
6 **SECOND CAUSE OF ACTION**

7 (RICO, 18 U.S.C. § 1962(c))

8 ***Plaintiff Areej Against Defendants Twitter, KSA, Al-Qahtani, Abouammo,
9 Alzabarah, Almutairi, and Al-Asaker***

10 140. Plaintiffs repeat and reallege the allegations in paragraphs 1-139 as if fully set forth
11 herein.

12 141. Defendants are members of an enterprise engaged in and whose activities affect
13 interstate commerce. The purpose of the Saudi Criminal Enterprise is to suppress dissent and
14 criticism of Defendant KSA, non-party MBS, and the Saudi royal family by conscripting social
15 media organizations in the United States and abroad and silencing dissidents through theft,
16 kidnapping, indefinite detention, torture, and killing.

17 142. Defendants agreed to and did participate in the conduct of the Saudi Criminal
18 Enterprise’s affairs through a pattern of racketeering activity and for the unlawful purpose of
19 fraudulently accessing and stealing third parties’ identifying information to conspire to retaliate
20 against dissenters, including the kidnapping and torture of Plaintiff Abdulrahman and to threaten,
21 harass, and silence Plaintiff Areej.

22 143. The following acts of the Saudi Criminal Enterprise constitute a pattern of
23 racketeering activity pursuant to 18 U.S.C. § 1961(5):
24
25
26
27

- 1 a. Acts 1 to 30,892: Accessing and transferring nearly 6,000 third-party users’
2 confidential personally identifying information 30,892 times from Twitter
3 users, including that of Plaintiff Abdulrahman and Omar Abdulaziz, without
4 the third-party users’ permission, to identify and target third-party Twitter users
5 who communicated and published political dissent of Defendant KSA, in
6 violation of 18 U.S.C. § 1028(a)(7).
7
8 b. Acts 1 to 30,892: Using modified telecommunications instruments to obtain
9 unauthorized access and use of nearly 6,000 third-party user accounts with
10 intent to defraud third-party Twitter users 30,892 times, including Plaintiff
11 Abdulrahman and Omar Abdulaziz, and affecting interstate commerce, in
12 violation of 18 U.S.C. § 1029(a)(7).
13
14 c. Acts 30,893 to 30,895: Kidnapping Plaintiff Abdulrahman, in violation of Cal.
15 Penal Code § 207(a), and torturing and conspiring to kill Plaintiff
16 Abdulrahman, in violation of Cal. Penal Code §§ 187, 189.
17
18 d. Acts 30,896 to 30,898: Conspiracy to kidnap, torture, and kill Omar Abdulaziz,
19 in violation of Cal. Penal Code § 207(a) and Cal. Penal Code §§ 187, 189.
20
21 e. Acts 30,899 to 30,901: Kidnapping, torturing, and killing Jamal Khashoggi, in
22 violation of Cal. Penal Code § 207(a) and Cal. Penal Code §§ 187, 189.
23
24 f. Acts 30,902 to 30,904: Conspiracy to kidnap, torture, and kill Saad Aljabri, in
25 violation of Cal. Penal Code § 207(a) and Cal. Penal Code §§ 187, 189.
26
27 g. Act 30,905: Kidnapping Saad Almadi, in violation of Cal. Penal Code § 207(a).
28 h. Acts 30,906 to 30,908: Conspiracy to kidnap, torture, and kill Plaintiff Areej,
in violation of Cal. Penal Code §§ 187, 189, 207(a).

1 144. Defendants have directly and indirectly conducted and participated in the conduct
2 of the Saudi Criminal Enterprise's affairs through the pattern of racketeering and activity described
3 above, in violation of 18 U.S.C. § 1962(c).

4 145. Defendants intended to cause injury to Plaintiff Areej, a public and vocal dissident
5 of Defendant KSA's authoritarian regime.

6 146. As a direct and proximate result of Defendants' racketeering activities and in
7 violation of 18 U.S.C. § 1962(c), Plaintiff Areej has been severely harmed. Defendants' activities
8 have directly and proximately caused severe financial and professional harms.
9

10 147. Plaintiff Areej is entitled to damages, costs, and fees as allowed by law.
11

12 **THIRD CAUSE OF ACTION**

13 (Alien Tort Statute, 28 U.S.C. § 1350)

14 ***Plaintiff Abdulrahman Against Defendants Twitter, Abouammo, and Alzabarah***

15 148. Plaintiffs repeat and reallege the allegations in paragraphs 1-146 as if fully set forth
16 herein.

17 149. Defendants Twitter, Abouammo, and Alzabarah engaged in a joint criminal
18 enterprise with, conspired with, or aided and abetted Defendant KSA in torturing Plaintiff
19 Abdulrahman. Defendant KSA tortured Plaintiff Abdulrahman with electric shocks, flogged and
20 hung him from his feet, suspended him in contorted positions, deprived him of sleep, threatened
21 to behead him, insulted him, and kept him in solitary confinement for years.

22 150. Defendants Twitter, Abouammo, and Alzabarah acted knowingly and with specific
23 intent that Defendant KSA would detain and torture individuals whose confidential Twitter
24 account data Defendants Twitter, Abouammo, and Alzabarah transmitted to Defendant KSA,
25 including Plaintiff Abdulrahman's confidential Twitter account data.
26
27

1 151. Defendants Twitter, Abouammo, and Alzabarah acted under apparent authority or
2 color of law of Defendant KSA.

3 152. Defendants Twitter, Abouammo, and Alzabarah provided substantial assistance to
4 and agreed to participate in Defendant KSA's torture of Plaintiff Abdulrahman by providing
5 Plaintiff Abdulrahman's identifying information to Defendant KSA.
6

7 153. The torture of Plaintiff Abdulrahman constitutes a "tort . . . committed in violation
8 of the law of nations or a treaty of the United States" under the Alien Tort Statute, 28 U.S.C.
9 § 1350, in that it violated customary international law prohibiting torture as reflected, expressed,
10 defined, and codified in customary international law, multilateral treaties and other international
11 instruments, international and domestic judicial decisions, and other authorities.
12

13 154. As a result of being tortured in violation of the law of nations, Plaintiff
14 Abdulrahman has suffered severe physical and mental pain, suffering, and anguish.

15 155. As a result of being tortured in violation of the law of nations, Plaintiff
16 Abdulrahman is entitled to damages in an amount to be determined at trial.
17

18 156. Defendants Twitter, Abouammo, and Alzabarah's acts were deliberate, willful,
19 intentional, wanton, malicious, and oppressive, and should be punished by an award of punitive
20 damages in an amount to be determined at trial.

21 157. Additionally, Plaintiff Abdulrahman is entitled to a declaratory judgment stating
22 that Defendants have violated the law of nations.
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PRAYER FOR RELIEF

1
2 **WHEREFORE**, Plaintiffs Abdulrahman and Areej pray that the Court enter judgment and
3 relief as follows:

4 A. Appointing Plaintiff Areej as Next Friend of Plaintiff Abdulrahman pursuant to
5 Federal Rule of Civil Procedure 17(c)(2);

6 B. Awarding Plaintiffs Abdulrahman and Areej a money judgment for damages, in an
7 amount to be determined at trial;

8 C. Awarding Plaintiff Abdulrahman punitive and exemplary damages;

9 D. Awarding Plaintiff Abdulrahman declaratory relief that Defendants have violated
10 his rights;

11 E. Awarding Plaintiffs Abdulrahman and Areej prejudgment interest;

12 F. Awarding Plaintiffs Abdulrahman and Areej reasonable attorney’s fees and costs
13 incurred in connection with this action; and

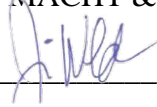
14 G. Granting such other and further relief as this Court deems just and proper.
15

16
17
18 **JURY DEMAND**

19 158. Plaintiffs Abdulrahman and Areej demand trial by jury of all claims triable to a jury
20 in this action.

1 Dated: May 16, 2023, in San Francisco, California

2
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