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18 **UNITED STATES DISTRICT COURT**

19 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

20 BROIDY CAPITAL MANAGEMENT
21 LLC, ELLIOTT BROIDY, and ROBIN
ROSENZWEIG,

22 Plaintiffs,

23 v.

24 STATE OF QATAR, STONINGTON
25 STRATEGIES LLC, NICOLAS D.
MUZIN, and DOES 1-10,

26 Defendants.

Case No. 2:18-cv-2421

**COMPLAINT AND DEMAND FOR
JURY TRIAL**

1 Plaintiffs Broidy Capital Management LLC, Elliott Broidy, and Robin
2 Rosenzweig, by and through their attorneys Boies Schiller Flexner LLP, bring
3 this action seeking injunctive relief and monetary damages against Defendants
4 the State of Qatar, Stonington Strategies LLC (“Stonington”), Nicolas D.
5 Muzin (“Muzin”), and Does 1-10, for Defendants’ unlawful conduct, as set
6 forth below. Defendants Stonington, Muzin, and Does 1-10 are collectively
7 referred to herein as the “Agent Defendants.”

8 NATURE OF THE ACTION

9 1. This is a case about a hostile intelligence operation undertaken by
10 a foreign nation on the territory of the United States against successful,
11 influential United States citizens who have spoken out against that country’s
12 support for terrorism and who have entered into significant business
13 relationships relating to defense and counterterrorism with a rival nation. The
14 purpose of the operation appears to have been to diminish the influence of
15 Plaintiffs within the United States through a campaign to discredit Plaintiffs in
16 the press and in the eyes of government officials, and to disrupt their business
17 relationship with rival nations.

18 2. The State of Qatar, by itself and/or through its agents, unlawfully
19 hacked into the email accounts and computer servers of United States citizens
20 in California, stole private emails and documents from them, and broadly
21 disseminated the stolen emails and documents to domestic and foreign media.
22 Defendants engaged in a sophisticated electronic warfare, espionage, and
23 disinformation campaign against Plaintiffs in an effort to retaliate against
24 them, and to discredit them in the United States and abroad. In addition to
25 disseminating unlawfully stolen emails and documents, Defendants doctored
26 or wholly forged documents using information found on Plaintiffs’ computers
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1 to portray a false narrative about Plaintiffs, and to disseminate that false
2 narrative to media organizations.

3 3. The State of Qatar sponsors and supports terrorists, having once
4 been called a “Club Med for Terrorists.” Last year, the State of Qatar
5 launched a multi-million dollar public relations campaign to obfuscate its ties
6 to, and financial and logistical support of, some of the world’s worst extremist
7 and terrorist organizations—including Al Qaeda (and its affiliate Al-Shabab),
8 Hamas, the Taliban, and the Muslim Brotherhood—and to change its image in
9 the United States, specifically in the Jewish community in the United States.
10 To lead this campaign in the United States, the State of Qatar hired Defendant
11 Muzin’s firm and several other agents, included among the John Does 1-10.

12 4. Defendants’ actions are motivated by activities undertaken by
13 Plaintiff Broidy that threaten the State of Qatar. As a prominent member of
14 the American Jewish community who has frequently interacted with the
15 President of the United States, Plaintiff Broidy has been especially vocal in
16 expressing criticism of the State of Qatar’s support of terrorism, to private
17 persons, to United States government officials whom the State of Qatar wishes
18 to influence (including the President), and to the public at large, through the
19 support of initiatives that highlight Qatar’s efforts to deceive Americans (such
20 as by telling the world they are against terrorism and housing a United States
21 military base while at the same time giving support and assistance to
22 terrorists).

23 5. On June 5, 2017, the United Arab Emirates (“UAE”) and Saudi
24 Arabia led an effort to isolate the State of Qatar because of the State of
25 Qatar’s support for terrorism as well as the country’s close ties to Iran. The
26 UAE and Saudi Arabia severed diplomatic relations with the State of Qatar,
27 and the UAE closed its airspaces to Qatari aircrafts. Saudi Arabia further

1 closed its border with Qatar and banned Qatari-flagged ships from docking at
2 Saudi Arabian ports.

3 6. Plaintiff Broidy operates businesses that have contracts with the
4 government of the UAE to assist the UAE in developing its defense and
5 counterterrorism capabilities. These contracts, which were finalized in 2017,
6 are worth over \$200 million. Plaintiff Broidy also has entered into
7 preliminary discussions with Saudi Arabia about providing similar capabilities
8 enhancement in that country.

9 7. For more than 25 years, Plaintiff Broidy has supported the State
10 of Israel through donations to many organizations.

11 8. Since September 11, 2001, Plaintiff Broidy has increased his
12 involvement in supporting the safety of his homeland, the United States. As
13 part of his involvement, he became active in fundraising for the Republican
14 Party because he believed its views on how to defend the United States were
15 aligned with his own. He also became involved in numerous civic activities
16 involving counter-terrorism to promote the security of the United States.

17 9. Beginning with the AIPAC Policy Conference at the end of
18 March 2017, Plaintiff Broidy and others began to be vocal critics of the State
19 of Qatar's for its support for terrorists and its friendly relationship with Iran,
20 which Mr. Broidy sees as a major threat to the security of the United States
21 and its allies, and began to support financially public initiatives – such as
22 conferences – to educate Americans about Qatar's support for terrorist and
23 extremist organizations.

24 10. Shortly thereafter, the State of Qatar, in an attempt to blunt the
25 effect of the these initiatives and media reports highlighting its duplicitous
26 nature, hired teams of lobbyists and began to spend millions of dollars in an
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1 effort to whitewash its record and hide the true facts about its support for
2 terrorists.

3 11. These lobbyists include Avenue Strategies, a firm founded by
4 Corey Lewandowski, former campaign manager for the Trump campaign, and
5 former U.S. Attorney General John Ashcroft, whose responsibilities included
6 lobbying members of Congress and the Trump Administration (including the
7 White House) to try to convince our nation’s political leadership to see
8 Defendant State of Qatar in a more favorable light.

9 12. Defendant State of Qatar also tried to enlist the support of the
10 Jewish community in the United States, and hired Defendant Muzin.
11 Defendant Muzin owns and operates Defendant Stonington, which is a
12 registered foreign agent of the State of Qatar. The State of Qatar pays Muzin
13 \$300,000 per month for “strategic communications” and for trying to
14 influence public opinion in, and the foreign policies of, the United States.
15 Muzin has been employed by the State of Qatar to improve the State of
16 Qatar’s image in the United States and whitewash its coddling of terrorist
17 leaders by getting support from Jewish leaders. Defendant Muzin first
18 attempted to try to arrange meetings between leaders of American Jewish
19 organizations and the current Emir of Qatar, Sheikh Tamim bin Hamad Al
20 Thani (the “Emir”) while the Emir was attending the United Nations General
21 Assembly in New York City. The opposition of Plaintiff Broidy and others to
22 these efforts helped prompt American Jewish leaders to refuse to meet with
23 the Emir at the United Nations General Assembly in September 2017, thereby
24 frustrating the State of Qatar’s plan as well as Muzin’s efforts to win over
25 Jewish leaders. According to a February 13, 2018 article in *Tablet Magazine*,
26 an online publication focused on Jewish news, “Muzin largely failed to
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1 persuade Jewish leaders to agree to meetings with influential Qataris visiting
2 New York for the opening of the United Nations General Assembly.”

3 13. Soon after the failure of the State of Qatar’s and the Agent
4 Defendants’ United Nations General Assembly initiative, Muzin began to
5 invite American Jewish leaders on all-expense-paid trips to Qatar to further
6 the State of Qatar’s public relations campaign. Plaintiff Broidy and others
7 again encouraged American Jewish leaders to decline the invitations. These
8 efforts were mostly successful in helping to prompt many American Jewish
9 leaders to decline to participate in the public relations trips to Qatar.

10 14. The Emir is expected to travel again to the United States in April
11 2018 for bilateral meetings with the Trump Administration and visits to
12 Capitol Hill. The failure of the State of Qatar and its agents to improve the
13 State of Qatar’s image in the United States—and, specifically, with the
14 American Jewish community—led to meetings and discussions in advance of
15 the Emir’s anticipated visit to discuss the impediments to the State of Qatar’s
16 public relations efforts. On information and belief, during those discussions,
17 many of which occurred in the Embassy of Qatar in Washington, D.C.,
18 Defendant Muzin fingered Plaintiff Broidy as such an impediment.

19 15. Starting last year, the State of Qatar, Muzin, and other foreign
20 agents conspired in a strategic campaign to retaliate against and discredit
21 Plaintiff Broidy. Through this campaign, Defendant State of Qatar seeks to
22 damage Plaintiff Broidy’s reputation in order to frustrate his ability to educate
23 the American people about Qatar, to damage his reputation and reduce his
24 influence within the United States, to harm his ability to do further business
25 with the UAE and other Middle Eastern countries that are aligned against
26 Qatar because of its support for terrorism, and to impact negatively his other
27 business prospects around the world.

1 16. Over a period of months, on information and belief in the second
2 half of 2017 and in the first quarter of 2018, including critically on February
3 14, 2018, the State of Qatar, by itself and/or through its agents, hacked
4 Plaintiffs’ personal and business email accounts and computer servers in
5 California. On information and belief, during the same time period and using
6 similar techniques, the State of Qatar also, by itself and/or through its agents,
7 hacked the electronic communications of at least one other United States-
8 based, United States citizen who was also involved in activities that threatened
9 Defendant State of Qatar’s public relations campaign.

10 17. On information and belief, Defendants illegally accessed
11 Plaintiffs’ credentials and used those credentials, along with other means, to
12 access Plaintiffs’ computer networks, and to thereafter steal and doctor
13 Plaintiffs’ emails and documents.

14 18. On information and belief, Defendants then began to disseminate
15 these emails and documents—including the forged documents—to media
16 organizations around the world and to provide those media organizations with
17 false stories based on those documents.

18 19. Defendants’ efforts to target Plaintiff Broidy in this manner have
19 been largely successful—several media organizations have published articles
20 (including front page stories in the March 22 and 26, 2018 editions of *The*
21 *New York Times*, a March 26, 2018 story by the Associated Press, a story in
22 the March 1, 2018 edition of the *Wall Street Journal*, and additional articles in
23 *The Huffington Post*, *McClatchy* and *Bloomberg News*, which stories were
24 reprinted or summarized by numerous other news outlets). As acknowledged
25 in the article in today’s *New York Times*, these articles were based on
26 information news organizations received from anonymous sources which
27 claimed the materials were hacked from Plaintiffs’ computers. Some of the
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1 documents received by these news organizations were clearly falsified, altered
2 or forged.

3 20. Al Jazeera, the international broadcaster owned by the State of
4 Qatar, was the only news organization willing to publish a story that relied on
5 clearly falsified or forged documents purporting to contain proof that Plaintiff
6 Broidy engaged in potentially unlawful business activities with a Russian
7 bank that is now sanctioned by the United States.

8 21. As a result of Defendants' actions, Plaintiffs, and in particular
9 Plaintiff Broidy, have been harmed. If Defendants are not enjoined from
10 disseminating the unlawfully obtained and fabricated data, Plaintiffs will
11 continue to suffer further serious injury. As a result, Plaintiffs request
12 injunctive relief to prevent the further accessing, use, and dissemination of
13 Plaintiffs' data by Defendants, who seek only to benefit themselves and harm
14 Plaintiffs by illegally targeting United States citizens. Plaintiffs also seek
15 monetary damages with respect to harm that has already occurred, despite the
16 inability of such monetary damages to fully compensate Plaintiffs for the
17 harm they have suffered.

18 **PARTIES**

19 22. Plaintiff Broidy Capital Management LLC ("BCM") is an
20 investment firm run by Plaintiff Elliott Broidy. BCM is a corporation duly
21 organized under the laws of the State of California with its principal place of
22 business in Los Angeles, California.

23 23. Plaintiff Elliott Broidy is a citizen of the United States and the
24 State of California who resides in Los Angeles, California. Plaintiff Broidy is
25 the Chief Executive Officer and Chairman of BCM.

26 24. Plaintiff Robin Rosenzweig is a citizen of the United States and
27 the State of California who resides in Los Angeles, California. Plaintiff

1 Rosenzweig is a sole practitioner attorney with a law firm called Colfax Law
2 Office, Inc. and the wife of Plaintiff Broidy.

3 25. Defendant the State of Qatar is a foreign state. The head of state
4 and head of government of Qatar is the current Emir of Qatar, Sheikh Tamim
5 bin Hamad Al Thani. The Emir has made visits to Los Angeles, California
6 and has hosted the Mayor of Los Angeles, Eric Garcetti, in Doha, the capital
7 of Qatar, as part of an effort to strengthen the partnership between the cities of
8 Los Angeles and Doha. Additionally, the State of Qatar maintains a
9 Consulate in Los Angeles, California. Entities related to the State of Qatar
10 own a majority interest in Ooredoo Q.S.C. (“Ooredoo”), an international
11 telecommunications company incorporated under the laws of Qatar with its
12 principal place of business in Doha, Qatar. Ooredoo provides services
13 throughout the Middle East and Southeast Asia and, in partnership with T-
14 Mobile and AT&T, provides roaming services in the United States, and its
15 facilities were employed to attack Plaintiffs’ computer servers.

16 26. Defendant Stonington Strategies LLC is a public relations and
17 lobbying firm incorporated under the laws of Delaware, with its principal
18 place of business in New York City. Stonington registered on September 3,
19 2017 under the Foreign Agents Registration Act (“FARA”), 22 U.S.C. § 611
20 *et seq.*, as a foreign agent providing “strategic communications” for the State
21 of Qatar. Stonington originally was retained to provide these services for
22 \$50,000 per month. On November 1, 2017, the State of Qatar increased the
23 amount to \$300,000 per month.

24 27. Defendant Nicolas D. Muzin is the Chief Executive Officer of
25 Stonington and a political lobbyist who signed the FARA documents on
26 behalf of Stonington as a registered foreign agent of the State of Qatar.

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1 Defendant Muzin is a citizen of the United States and a resident of the state of
2 Maryland.

3 28. On information and belief, Defendants Does 1-10 are agents of
4 the State of Qatar, some of whom may not have not registered under FARA.
5 On information and belief, none of Defendants Does 1-10 is a citizen or
6 resident of the state of California.

7 JURISDICTION AND VENUE

8 29. This Court has subject matter jurisdiction and personal
9 jurisdiction over the State of Qatar pursuant to 28 U.S.C. § 1330 and the
10 Foreign Sovereign Immunities Act (the “FSIA”), 28 U.S.C. § 1602 *et seq.*,
11 because its conduct falls within the exception to foreign sovereign immunity
12 set forth in 28 U.S.C. § 1605(a)(5). Plaintiffs intend to serve the State of
13 Qatar pursuant to 28 U.S.C. § 1608(a), among other lawful means that may
14 present themselves.

15 30. This Court further has subject matter jurisdiction over this action
16 under 28 U.S.C. § 1331, and supplemental jurisdiction over Plaintiffs’ state
17 law claims under 28 U.S.C. § 1367. Additionally, this Court has subject
18 matter jurisdiction over Plaintiffs’ claims under 28 U.S.C. § 1332 because
19 Plaintiffs are all citizens of the state of California and, to Plaintiffs’
20 knowledge, none of the Defendants is a citizen of the state of California.
21 Accordingly, the citizenship of the parties is diverse. The amount in
22 controversy exceeds \$75,000, exclusive of interest and costs.

23 31. This Court has personal jurisdiction over the Agent Defendants
24 under the state of California’s long-arm statute, Cal. Civ. Proc. Code § 410.10.

25 32. Venue is proper in this judicial district under 28 U.S.C. §
26 1391(b)(2) because a substantial part of the events or omissions giving rise to
27 this claim occurred in this judicial district. Venue is also proper in this

1 judicial district under 28 U.S.C. § 1391(f)(1) for the same reasons and because
2 Defendant the State of Qatar is a foreign state.

3 STATEMENT OF FACTS

4 **I. DEFENDANTS DELIBERATELY TARGETED PLAINTIFF** 5 **BROIDY BECAUSE OF HIS AFFILIATIONS, HIS** 6 **INFLUENCE, AND HIS CRITICISMS OF THE STATE OF** 7 **QATAR.**

8 33. Defendant the State of Qatar has allowed and continues to allow
9 itself to be a sanctuary for terrorist leaders and organizations, including but
10 not limited to Al Qaeda (and its affiliates including Al-Shabab and Al Qaeda
11 in Syria, also known as Al-Nusra Front or Jabhat Al-Nusra), Hamas, the
12 Taliban, and the Muslim Brotherhood.

13 34. Numerous individuals residing in Qatar have been sanctioned by
14 the United States Department of Treasury for raising funds for Al Qaeda.

15 35. Individuals who serve as fundraisers for Al Qaeda's Syrian
16 franchise (the Nusra Front) operate freely in Qatar. These individuals appear
17 at state-owned Mosques and on broadcasts aired by the state-funded Al
18 Jazeera. The State of Qatar has failed to shut down these fundraisers.

19 36. The State of Qatar has also been accused of hosting the Somali
20 terrorist group Al-Shabab, an Al Qaeda affiliate.

21 37. The State of Qatar also has permitted Hamas leaders to operate
22 freely within the country. Indeed, the State of Qatar has provided substantial
23 funding to Hamas, despite being subjected to international political and
24 economic sanctions for such support.

25 38. The State of Qatar has further allowed the Taliban to operate and
26 maintain an office in Doha.

1 decided to retain agents in Washington, D.C. and to pay them significant sums
2 of money to impact public opinion and public policy in the United States.
3 According to the Center for Responsive Politics, the State of Qatar spent
4 nearly five million dollars on lobbyists and media relations in 2017 in an
5 effort to ensure that the United States would support the State of Qatar in its
6 diplomatic standoff with other Arab countries.

7 45. Among the high-profile agents hired by the State of Qatar was
8 former Attorney General John Ashcroft, who leads that engagement for the
9 Ashcroft Law Group. The relevant contract with the State of Qatar states that
10 former Attorney General Ashcroft would seek to “enlist the support and
11 expertise of former key government leaders, including former officials who
12 held very senior positions within the Intelligence Community, the Federal
13 Bureau of Investigation, the Department of Treasury and the Department of
14 Homeland Security[.]”

15 46. Defendant Muzin also sought out other high-profile individuals
16 who could be helpful in furthering the interests of the State of Qatar. On
17 information and belief, Defendant Muzin recruited former Arkansas Governor
18 Mike Huckabee, a Republican candidate for President, prominent media
19 commentator, and father of current White House Press Secretary Sarah
20 Huckabee Sanders, to participate on a trip to Qatar. On January 8, 2018,
21 former Governor Huckabee tweeted “I’m in Doha,” and then on January 12,
22 2018, tweeted, “Just back from a few days in surprisingly beautiful, modern,
23 and hospitable Doha[.]”

24 47. On information and belief, Defendant Muzin also met with White
25 House aide Victoria Coates, the Senior Director for International Negotiations
26 on the National Security Council and a former aide to Senator Ted Cruz, to
27 advocate for United States policies that would be supportive of the State of
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1 Qatar. On information and belief, Defendant Muzin got Coates to have her
2 boss, Jason Greenblatt, the Special Envoy for International Negotiations, send
3 out a Tweet that was supportive of Qatar. On February 9, 2018, Greenblatt
4 tweeted: “Qatar partnering with Israel can bring real relief to the people of
5 Gaza. Ending support for Hamas and focusing on humanitarian aid and
6 reconstruction will end the suffering.”

7 48. One of the objectives of this multi-million dollar lobbying effort
8 was to whitewash and obscure the voluminous record of the State of Qatar’s
9 support for terrorism. The State of Qatar also sought to discredit United States
10 citizens who opposed the State of Qatar’s agenda and frustrated its public
11 relations offensive.

12 49. Even before Defendant Muzin was retained, officials of
13 Defendant State of Qatar told him at a meeting in Qatar of their concerns
14 about Plaintiff Broidy. As Defendant Muzin recounted, “They knew about
15 him [Broidy]” and “knew that he [Broidy] had been influential” in shaping the
16 White House’s views on Qatar.

17 50. Qatari officials complained in particular about President Trump’s
18 remarks at a June 2017 meeting of the Republican National Committee where
19 President Trump singled out Plaintiff Broidy in the audience and stated:
20 “Elliott Broidy is fantastic.” That acknowledgment was followed by a round
21 of applause. Later in his speech, President Trump made the following remarks
22 in the speech: “We’re having a dispute with Qatar — we’re supposed to say
23 Qatar. It’s Qatar, they prefer. I prefer that they don’t fund terrorism.”

24 51. According to Defendant Muzin, the officials of Defendant State
25 of Qatar, with whom he met shortly after President Trump’s remarks stated:
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1 “Broidy was like sitting in the front row and that he had somehow prompted
2 Trump to say that.”

3 52. According to filings with the United States Department of Justice
4 mandated under FARA, at least the following agents were retained in the
5 second half of 2017 or the first quarter of 2018 to help the State of Qatar to
6 improve its image in the United States:

- 7 a. Avenue Strategies Global LLC (July 17, 2017 agreement), a
8 firm with which former Trump Campaign Manager Corey
9 Lewandowski has been affiliated, at the rate of \$150,000 per
10 month, increased to \$500,000 per month on September 5,
11 2017;
- 12 b. Stonington Strategies LLC (August 24, 2017 agreement) at
13 the rate of \$50,000 per month, increased to \$300,000 per
14 month on November 1, 2017;
- 15 c. Ashcroft Law Group (June 7, 2017 agreement), at the rate of
16 \$2.5 million for a 90 day retainer
- 17 d. Levick Strategic Communications (June 5, 2017 agreement) at
18 the rate of \$54,000 per month;
- 19 e. Information Management Services Inc. (June 19, 2017
20 agreement) at the rate of \$375,000 per month;
- 21 f. Conover & Gould Strategic Communications (June 29, 2017
22 agreement) at the rate of \$100,000 per month;
- 23 g. Gallagher Group (July 11, 2017 agreement) at the rate of
24 \$25,000 per month;
- 25 h. McDermott, Will & Emery (July 13, 2017 agreement) at the
26 rate of \$40,000 per month;

- 1 i. Nelson Mullins Riley & Scarborough LLP (July 26, 2017
- 2 agreement) at the rate of \$100,000 per month;
- 3 j. Portland PR (December 6, 2017 agreement) at the rate of
- 4 \$123,195 per month;
- 5 k. Mercury Public Affairs (September 7, 2017 agreement) at the
- 6 rate of \$120,000 per month;
- 7 l. Bluefront Strategies (September 12, 2017 agreement)
- 8 \$100,000;
- 9 m. Hawksbill Group (August 1, 2017 agreement) \$165,000;
- 10 n. Vitello Consulting (December 6, 2017 agreement) \$10,000 as
- 11 a subcontractor of Stonington Strategies;
- 12 o. Iron Bridge Strategies (February 1, 2018 agreement) at the
- 13 rate of \$25,000 per month;
- 14 p. Tigercomm LLC (January 11, 2018 agreement) at the rate of
- 15 \$30,000 per month;
- 16 q. Husch Blackwell Strategies (February 1, 2018 agreement) at
- 17 the rate of \$25,000 per month;
- 18 r. SGR Government Relations & Lobbying (February 1, 2018
- 19 agreement) at the rate of \$40,000 per month; and
- 20 s. Venable LLP (January 31, 2018 agreement) at the rate of
- 21 \$150,000 per month.

22 53. Defendant Muzin, CEO of Stonington, is a graduate of Yale Law
23 School and a high-level Republican political operative. Muzin served as chief
24 of staff to then-Congressman Tim Scott and served as senior policy advisor
25 and deputy chief of staff for strategy to Senator Ted Cruz. According to his
26 biography on the Stonington website, Muzin also worked on the Trump
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1 Presidential campaign as well as on the transition team to recruit candidates
2 for the new Administration.

3 54. Defendant Muzin's efforts as an agent of the State of Qatar
4 quickly focused on an effort to put a pro-Jewish spin on the State of Qatar's
5 facilitation of terrorist activities in the Middle East. Muzin is quoted in a
6 September 5, 2017 article in *O'Dwyer's*, an online magazine covering the
7 public relations industry, as stating: "Engagement with Qatar can only be in
8 the best interests of the United States and the Jewish community, as we cannot
9 allow Qatar to be ostracized by its neighbors and pushed into Iran's sphere of
10 influence."

11 55. Shortly thereafter, as reported by the Israeli newspaper *Haaretz*,
12 Defendant Muzin invited American Jewish leaders to meet with the Emir in
13 New York City during the Emir's visit for the United Nations General
14 Assembly later that month.

15 56. The Zionist Organization of America ("ZOA") reacted to that
16 invitation with a press release on September 12, 2017, in which the
17 organization's president, Morton A. Klein, stated that although he had
18 "received an invitation to meet with" the Emir of Qatar during the United
19 Nations General Assembly, he had "decided not to accept this invitation."
20 Mr. Klein further stated: "Any Jewish leader meeting with the Qatari Emir or
21 Crown Prince likely means well, but he will serve as an unwitting prop in
22 their PR ploy to whitewash the legitimate reasons why its Arab Muslim
23 neighbors are boycotting them and why Israel and Jews are horrified by them,
24 meaning it will only strengthen Qatar's embrace of Iran and critical backing of
25 Hamas."

26 57. Around that time and subsequently, Defendant Muzin, along with
27 others, also invited American Jewish leaders to Qatar.

1 invitations of the State of Qatar and Defendant Muzin to meet with the Emir
2 in New York City and/or to visit Qatar.

3 63. Additionally, on September 15, 2017, *Forbes* published a piece
4 by a contributing writer titled “Why is Qatar offering to trade dead Israelis for
5 meetings with live Jews?” The article reported that an offer was being made
6 to American Jewish leaders to return the corpses of two Israeli soldiers whom
7 Hamas had killed if those leaders would meet with the Emir. The article
8 stated:

- 9 a. Rabbi Shmuel Boteach (who according to *Newsweek* is one of
10 the ten most influential rabbis in the United States) stated that
11 “all who agreed to whitewash the terror-stained hands of the
12 emir would be condoning murder.”
- 13 b. The State of Qatar hired Defendant Muzin, who “may have
14 hinted to some Jewish leaders that his lobbying had the
15 ‘blessing’ of Israel’s elected government.” Israel’s
16 Ambassador to the United States, Ron Dermer, denied this,
17 stating: “It is not true.”
- 18 c. The State of Qatar has admitted to giving approximately \$1.4
19 billion to Hamas over the past few years.
- 20 d. Qatar is “like Woodstock for terrorists,” and has also “been
21 accused of hosting the Somali terrorist group Al-Shabab, an al
22 Qaeda affiliate.”
- 23 e. Defendant Muzin claimed that he contacted prominent
24 American Jewish leaders, but that “[e]ach denied agreeing to
25 any meeting with Qatar and two of these leaders denied ever
26 even speaking to Muzin.” “Like a child’s game of telephone,
27 Muzin apparently told each Jewish leader that a different
28

1 prominent Jew had already agreed to meet the emir. This
2 didn't turn out to be true.”

3 64. Although many American Jewish leaders declined the invitations
4 given in September 2017, Defendant Muzin continued his attempts to arrange
5 trips to Qatar for American Jewish leaders. These trips furthered the State of
6 Qatar's strategy to court favor with high-profile American Jewish leaders,
7 whom they believed could shift United States policy in favor of the State of
8 Qatar. On information and belief, in some instances, Defendant Muzin paid
9 for the trips taken. Among those participating in the trips were:

- 10 a. Rabbi Shmully Hecht, co-founder and Rabbinical Advisor of
11 Shabtai, the Jewish Society at Yale University, who wrote in a
12 January 25, 2018 article in *The Times of Israel*, an online Israeli
13 newspaper: “A few months ago, Nick Muzin asked me to attend
14 meetings with influential global thought leaders who are also
15 prominent in the Jewish world, and the Emir of Qatar. . . . Many
16 prominent Jewish leaders have flown to Qatar and have spent
17 quality time with the country's leadership.”
- 18 b. Alan Dershowitz, the Felix Frankfurter Professor of Law,
19 Emeritus, at Harvard Law School, who wrote in a January 12,
20 2018 article in *The Hill*: “I just returned from a private visit to
21 Qatar, at the invitation of and paid for by the Emir. . . . I observed
22 that Qatar is quickly becoming the Israel of the Gulf States,
23 surrounded by enemies, subject to boycotts and unrealistic
24 demands, and struggling for its survival.”
- 25 c. Mr. Klein, the President of ZOA, who, despite his initial
26 reluctance to meet with the Emir at the United Nations,
27 ultimately decided to travel to Qatar in order to have the chance

1 to confront the Emir, wrote in a January 30, 2018 article in
2 *Haaretz*: “I decided it was important for me to speak truth to
3 power, especially when the Emir repeatedly invited me to give
4 them my views on what they needed to do.”

- 5 d. Malcolm Hoenlein, the executive vice chairman of the
6 Conference of Presidents of Major Jewish Organizations.

7 65. Despite these successes, there was nonetheless significant
8 backlash in the American Jewish community against Defendant Muzin’s work
9 on behalf of the State of Qatar. For example:

- 10 a. On January 15, 2018, Rabbi Shmuel Boteach published “An
11 Open Letter to the Emir of Qatar,” stating: “Newspapers are
12 filled with reports that you have hired an Orthodox Jew, Nick
13 Muzin, of Stonington Strategies, and his partners, as agents of
14 Qatar to promote your image among American Jews, and to
15 lobby the US government. There is non-stop chatter of rabbis,
16 writers and community leaders accepting free trips to Doha,
17 which is big news because your regime funds Hamas — which is
18 responsible for an endless stream of funerals in Israel.”
- 19 b. A spokesman for the Israeli Embassy in Washington denounced
20 the trips to Qatar. *See Haaretz* on January 31, 2018 (“We oppose
21 this outreach effort in the Jewish and pro-Israel community.”)
22 and the *New York Times* on February 9, 2018 (“We do not
23 approve of these visits by the Jewish organizations to Qatar.”).

24 66. Plaintiff Broidy did not make any public statements against the
25 trips to Qatar, but he and others did speak with other American Jewish leaders
26 to discourage them from going on the trips being organized by Defendant
27 Muzin on behalf of the State of Qatar.

1 72. Beginning January 16, 2018 and continuing until at least March
2 2, 2018, multiple instances of unlawful access to corporate email accounts at
3 BCM occurred. The accounts targeted included but were not limited to
4 Plaintiff Broidy’s own email account.

5 73. Although initial forensic analysis of the BCM email server logs
6 suggested that the unauthorized access originated from IP addresses in the
7 United Kingdom and the Netherlands, a more thorough review of server data
8 from February 14, 2018 revealed that the attack had originated from an IP
9 address in Qatar. On information and belief, the IP addresses in the
10 Netherlands and the United Kingdom originally identified were used to mask
11 the true identity of the source of the intrusion. Plaintiff Broidy’s advanced
12 cyber unit was able to uncover problems with the attacker’s obfuscation
13 technique on February 14, 2018, which revealed that the attack originated in
14 Qatar.

15 **III. DEFENDANT THE STATE OF QATAR, ACTING**
16 **THROUGH STATE-OWNED INSTRUMENTALITIES AND**
17 **THE AGENT DEFENDANTS, DELIBERATELY**
18 **OBTAINED AND DISSEMINATED STOLEN AND**
19 **ALTERED EMAILS AND DOCUMENTS (WHILE**
20 **KNOWING THEY WERE STOLEN), AND ENGAGED IN A**
21 **HOSTILE CAMPAIGN AGAINST PLAINTIFF BROIDY.**

22 74. On March 1, 2018, the contents of emails stolen from Plaintiffs
23 appeared in the *Wall Street Journal* in an article titled, “Trump Ally Was in
24 Talks to Earn Millions in Effort to End 1MDB Probe in U.S.” Additional
25 emails stolen from those accounts were published or reported on in other
26 media outlets: the *Huffington Post* on March 2, 2018; the *New York Times* on
27 March 3, 2018; and the BBC on March 5, 2018. On March 22, 2018, the *New*
28 *York Times* published a front page article noting that an “anonymous group
critical of Mr. Broidy’s advocacy of American foreign policies in the Middle
East” has been distributing “documents, which included emails, business

1 proposals and contracts,” supposedly belonging to Plaintiffs. On March 23,
2 2018, *Bloomberg* published an article alleging that Plaintiff Broidy had helped
3 get Russian companies removed from a United States sanctions list; the news
4 article noted that it had “received two separate documents this week
5 purporting to be versions” of a unverifiable January 2017 proposal by Plaintiff
6 Broidy geared towards influencing United States officials. On March 26,
7 2018, the *New York Times* published another front page story on Plaintiff
8 Broidy that again acknowledged that it relied on “[h]undreds of pages of Mr.
9 Broidy’s emails, proposals and contracts” received from “an anonymous
10 group critical of Mr. Broidy’s advocacy of American foreign policies in the
11 Middle East.” On information and belief, the State of Qatar, acting through
12 the Agent Defendants, disseminated the various stolen emails and documents,
13 some of which had been doctored.

14 75. On information or belief, the State of Qatar, acting through the
15 Agent Defendants, disseminated additional stolen documents that were not
16 authentic (including documents that had been altered or wholly fabricated)
17 that attempt to portray Plaintiff Broidy as involved with a Russian bank that
18 had been the subject of international sanctions. Al Jazeera, the State of
19 Qatar’s state-owned broadcaster, published those documents on March 8,
20 2018. None of the other media organizations to which the documents had
21 been distributed at the time did so.

22 76. On March 8, 2018, Defendant Muzin demonstrated his
23 knowledge that Plaintiff Broidy had been successfully targeted by the State of
24 Qatar by stating: “I did not cause the Broidy stuff, just because I have
25 information” and “I don’t know all the details, but I know that I am hearing
26 repeatedly that there’s a lot more coming.”

1 77. On information and belief, following that March 8, 2018
2 conversation, there were further unlawful disclosures of the contents of
3 Plaintiffs' emails and the altered and forged documents, and the *New York*
4 *Times*, *The Associated Press*, *Newsweek*, *Bloomberg*, *The Huffington Post*,
5 and other news organizations have indicated to Plaintiffs that they have
6 received documents that purport to belong to Plaintiffs, and plan to write
7 additional stories about them. The dissemination of stolen and doctored
8 materials concerning Plaintiffs is ongoing.

9 78. Although Defendant Muzin has attempted to distance himself
10 from the attacks on those accounts by stating he wasn't "the one who's calling
11 the reporters and giving the stories," Defendant Muzin also mentioned that
12 there are weekly meetings at the Embassy of Defendant State of Qatar in
13 Washington D.C. in which he or his representatives along with high-level
14 Embassy personnel and other registered agents of Defendant the State of
15 Qatar discuss strategies to improve its image, which strategies include
16 targeting and destroying the reputations of those who oppose them. "Broidy's
17 name comes up in Embassy meetings often," Defendant Muzin stated. In
18 subsequent conversations, Defendant Muzin clearly demonstrated his
19 knowledge of and encouragement of the unlawful conduct towards Plaintiff
20 Broidy and his participation in the conspiracy, by stating that "there's a lot
21 more coming," which, on information and belief, was followed by further
22 leaks of Plaintiffs' emails and the altered and forged documents. Defendant
23 Muzin stated to another individual critical of Qatar: "I know they're [Qatari
24 officials] after you and Broidy." (emphasis added.)

25 79. Defendant Muzin worked closely with high-level Qatari officials
26 on shaping their outreach in Washington D.C. He not only attended meetings
27 at the Embassy of Qatar but has been involved in planning the Emir's

1 forthcoming trip to Washington D.C., and was aware of details of that state
2 visit before they were made public. On information and belief, Defendant
3 Muzin hoped to parlay his high-level work with Qatari officials into lucrative
4 business deals in Qatar.

5 80. On March 19, 2018, Plaintiffs' counsel formally requested that
6 the State of Qatar take appropriate action to halt the attacks on Plaintiffs'
7 emails, documents, and data and to stop Defendants from disseminating
8 Plaintiffs' emails, documents, and data and/or to assist Plaintiffs in halting
9 dissemination if the hack had been conducted by a rogue actor in the State of
10 Qatar. However, to date, no response has been received to that letter.

11 81. On information and belief, the State of Qatar, with the knowledge
12 and participation of the Agent Defendants, orchestrated the attack on
13 Plaintiffs' email accounts after Defendant Muzin identified Plaintiff Broidy as
14 an individual who was opposing the State of Qatar's efforts to improve its
15 image and relationships in Washington, D.C. and who was aligned with its
16 regional rivals, the UAE and Saudi Arabia.

17 **FOR A FIRST CAUSE OF ACTION AGAINST ALL DEFENDANTS**
18 **Computer Fraud and Abuse Act**
19 **18 U.S.C. §§ 1030(a)(2)(C) & (a)(5)**

20 82. Plaintiffs incorporate and adopt by reference the allegations
21 contained in each and every preceding paragraph of this Complaint.

22 83. On information and belief, Defendant the State of Qatar, by itself
23 and/or through its agent Ooredoo and the Agent Defendants, accessed
24 Plaintiffs' computers at Broidy Capital Management, specifically by accessing
25 accounts associated with Plaintiff Broidy and other BCM employees. Said
26 Defendants first compromised Plaintiff Rosenzweig's personal email account
27 by a targeted phishing email in December 2017, and thereafter, beginning on
28 or about January 16, 2018, and without authorization, accessed the corporate

1 accounts of Plaintiff Broidy and other BCM employees. Defendants did so
2 with knowledge that they were accessing these accounts without Plaintiffs'
3 authorization. Defendants not only engaged in the deliberate phishing attacks
4 and unauthorized access, but also implemented identifiable obfuscation
5 techniques to engage in ultimately unsuccessful efforts to hide the origin of
6 their cyber-attacks.

7 84. On information and belief, by engaging in this conduct,
8 Defendants accessed protected computers, defined by 18 U.S.C.
9 § 1030(e)(2)(B) as computers “used in or affecting interstate or foreign
10 commerce or communication.”

11 85. On information and belief, after accessing the relevant accounts,
12 Defendants obtained and stole private emails and documents, and then
13 distributed Plaintiffs’ private information to the media. Defendants also
14 altered information contained in the emails, and in some instances wholly
15 forged new documents, and then distributed those altered or forged documents
16 to the media. On information and belief, by virtue of the actions of
17 Defendants, Plaintiffs suffered damage, including harm to their data,
18 programs, and computer systems, including but not limited to the stealing of
19 Plaintiffs’ data, and the corruption and doctoring of Plaintiffs’ emails.

20 86. On information and belief, by virtue of the actions of Defendants,
21 Plaintiffs also suffered loss, including but not limited to the investigation costs
22 associated with identifying the cyber-attacks and repairing the integrity of
23 Plaintiffs’ computer systems after the attacks, including by hiring forensic
24 investigators and data security experts, and attorneys, among other losses, in
25 an amount to be proven at trial, but in any event, in excess of \$5,000 and,
26 together with the other alleged damages, in excess of \$75,000, exclusive of
27 interest and costs.

1 87. On information and belief, the unlawful action by Defendants
2 also has caused, and will continue to cause Plaintiffs irreparable injury,
3 including reputational harm, an increased risk of further theft, an increased
4 risk of harassment, and increased risk of being required to engage in costly
5 efforts to defend themselves against erroneous, libelous accusations.
6 Plaintiffs' remedy at law is not itself adequate to compensate for the injuries
7 inflicted by Defendants. Accordingly, Plaintiffs are also entitled to injunctive
8 relief to prevent the further accessing, use, and dissemination of Plaintiffs'
9 data.

10 **FOR A SECOND CAUSE OF ACTION AGAINST ALL DEFENDANTS**
11 **California Comprehensive Computer Data Access and Fraud Act**
12 **Cal. Pen. Code § 502**

12 88. Plaintiffs incorporate and adopt by reference the allegations
13 contained in each and every preceding paragraph of this Complaint.

14 89. On information and belief, Defendant the State of Qatar, acting
15 by itself and/or through its agent Ooredoo and the Agent Defendants, violated
16 § 502(c)(2) by knowingly accessing and without permission taking and
17 making use of programs, data, and files from Plaintiffs' computers, computer
18 systems, and/or computer networks.

19 90. On information and belief, Defendants have violated § 502(c)(4)
20 by knowingly accessing and without permission altering Plaintiffs' data,
21 which resided in Plaintiffs' computers, computer systems, and/or computer
22 networks.

23 91. On information and belief, Defendants have violated § 502(c)(6)
24 by knowingly and without permission providing or assisting in providing, a
25 means of accessing Plaintiffs' computers, computer systems, and/or computer
26 networks.

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1 92. On information and belief, Defendants have violated § 502(c)(7)
2 by knowingly and without permission accessing, or causing to be accessed,
3 Plaintiffs' computers, computer systems, and/or computer networks.

4 93. On information and belief, Defendants have violated § 502(c)(9)
5 by knowingly and without permission using the Internet domain name or
6 profile of another individual in connection with the sending of one or more
7 email messages and thereby damaging Plaintiffs' computers, computer data,
8 computer systems, and/or computer networks.

9 94. Plaintiffs own certain data that comprises information that, on
10 information and belief, was obtained by Defendants as alleged above.

11 95. On information and belief, Defendants knowingly accessed the
12 computers at Plaintiff BCM as well as Plaintiff Rosenzweig's computer in the
13 manner described above, and knew that at the time they accessed the various
14 accounts, they were without authorization to do so. For this reason,
15 Defendants engaged in phishing attacks as well as identifiable obfuscation
16 techniques in an attempt to hide the origin of their cyber-attack.

17 96. On information and belief, after accessing the relevant accounts,
18 Defendants obtained and stole massive amounts of private emails and
19 documents, and then distributed Plaintiffs' private information to the media.
20 Defendants also doctored the information contained in the emails and
21 documents, and then distributed those doctored or altered emails and
22 documents to the media.

23 97. On information and belief, Defendants engaged in these actions
24 as part of a targeted attack on Plaintiff Broidy, who is an outspoken critic of
25 the Qatari government and whose businesses are assisting in developing the
26 defense and anti-terrorism capabilities of the UAE, one of the regional rivals
27

1 of the State of Qatar, and has engaged in discussions to do the same for Saudi
2 Arabia, another regional rival of the State of Qatar.

3 98. On information and belief, as a direct and proximate result of
4 Defendants' unlawful conduct, Plaintiffs have been damaged in an amount to
5 be proven at trial, but in any event, in excess of \$75,000 exclusive of interest
6 and costs, including but not limited to the investigation costs associated with
7 identifying the cyber-attacks; verifying the integrity of the computer systems,
8 computer networks, computer programs, and/or data; and repairing the
9 integrity of Plaintiffs' computer systems after the attack, including by hiring
10 forensic investigators and data security experts. Plaintiffs are also entitled to
11 recover their attorneys' fees pursuant to § 502(e).

12 99. Additionally, Defendants' actions were willful and malicious,
13 such that Plaintiffs are also entitled to punitive damages under § 502(e)(4).

14 100. On information and belief, Defendants' unlawful access to and
15 theft from Plaintiffs' computers, and Defendants' subsequent dissemination of
16 Plaintiffs' information, has also caused, and will continue to cause, Plaintiffs
17 irreparable injury, including reputational harm, an increased risk of further
18 theft, and an increased risk of harassment. Plaintiffs' remedy at law is not
19 itself adequate to compensate for the injuries inflicted by Defendants.
20 Accordingly, Plaintiffs are also entitled to injunctive relief to prevent the
21 further accessing, use, and dissemination of Plaintiffs' data.

22 **FOR A THIRD CAUSE OF ACTION AGAINST ALL DEFENDANTS**
23 **Receipt and Possession of Stolen Property**
24 **in Violation of Cal. Pen. Code § 496**

25 101. Plaintiffs incorporate and adopt by reference the allegations
26 contained in each and every preceding paragraph of this Complaint.

27 102. On information and belief, Defendant the State of Qatar, acting
28 by itself and/or through its agent Ooredoo and/or the Agent Defendants,

1 received property, including documents, emails, and other materials housed on
2 Plaintiffs' computer networks, which had been stolen from Plaintiffs or had
3 been obtained from Plaintiffs in a manner that constitutes theft. Plaintiffs are
4 engaged in ongoing efforts to receive additional property stolen from
5 Plaintiffs or obtained from Plaintiffs in a manner that constitutes theft.

6 103. On information and belief, Defendants knew that the property
7 they received was stolen or obtained in a manner that constituted theft, and
8 Defendants know that the property they are continuing to acquire and
9 disseminate can only be acquired if it is stolen or obtained in a manner that
10 constitutes theft. In fact, Defendant Muzin acknowledged that he had
11 information about the cyber-attacks and knew that there was "a lot more
12 coming."

13 104. On information and belief, as a result of Defendants' actions,
14 Plaintiffs have been damaged in an amount to be proven at trial, but in any
15 event, in excess of \$75,000, exclusive of interest and costs, and are entitled to
16 treble damages, the costs of bringing this suit, and attorneys' fees under §
17 496(c).

18 105. On information and belief, Defendants' unlawful actions have
19 also caused, and will continue to cause Plaintiffs irreparable injury, including
20 reputational harm, an increased risk of further theft, and an increased risk of
21 harassment. Plaintiffs' remedy at law is not itself adequate to compensate for
22 the injuries inflicted by Defendants. Accordingly, Plaintiffs are also entitled
23 to injunctive relief to prevent the further accessing, use, and dissemination of
24 Plaintiffs' data.

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1 **FOR A FOURTH CAUSE OF ACTION AGAINST ALL DEFENDANTS**
2 **Invasion of Privacy by Public Disclosure of**
3 **Private Facts**

4 106. Plaintiffs incorporate and adopt by reference the allegations
5 contained in each and every preceding paragraph of this Complaint.

6 107. Plaintiffs have a reasonable privacy interest in their personal
7 information, including information contained in their private email accounts.
8 Additionally, Plaintiffs had a reasonable expectation that information
9 contained in their email accounts would remain private.

10 108. Access to Plaintiffs' personal accounts was achieved by unlawful
11 hacking and stealing of personal data. Without these unlawful actions,
12 Plaintiffs' personal information would not have been made public.

13 109. On information and belief, after hacking, stealing, and altering
14 Plaintiffs' personal information, Defendant the State of Qatar, acting by itself
15 and/or through its agent Ooredoo and the Agent Defendants, publicly
16 disclosed Plaintiffs' personal information by disseminating the materials to
17 the media for publication, and sought to facilitate further disclosures by
18 providing staggered data "dumps" to the media.

19 110. On information and belief, the personal information that
20 Defendants have publicly disclosed includes, but is not limited to, confidential
21 communications between Plaintiff Broidy and his clients and/or personal
22 relations and legal documents, some of which have been fabricated or altered.

23 111. The public disclosure—and its threatened further disclosures—of
24 Plaintiffs' personal information constitutes a public disclosure of private facts.

25 112. At no time have Plaintiffs waived or otherwise taken any action
26 that would constitute an implied waiver of their privilege against the public
27 disclosure of private facts.

1 113. On information and belief, the personal information that
2 Defendants have publicized, and are threatening to further publicize, are not
3 matters of public concern. Neither Defendants nor the public have a need to
4 acquire, review, or disseminate Plaintiffs' personal information and
5 communications for any legitimate purpose. Nor, in fact, have Defendants
6 acted with a legitimate purpose. Rather, they have publicly disclosed
7 Plaintiffs' private information merely to attack a private United States citizen.

8 114. The public disclosure of Plaintiffs' personal information is highly
9 offensive to a reasonable person of ordinary sensibilities. Individuals have a
10 legitimate and reasonable interest in keeping their personal email
11 communications private, and reasonably expect that such information will not
12 be publicly disclosed.

13 115. The public disclosure of Plaintiffs' personal information has
14 caused, and will continue to cause, Plaintiffs injury, including reputational
15 harm, an increased risk of further theft, and an increased risk of harassment.

16 116. On information and belief, Plaintiffs will continue to suffer this
17 injury as long as their personal information is available to Defendants and,
18 consequently, to numerous organizations. Plaintiffs' remedy at law is not
19 itself adequate to compensate for the injuries inflicted by Defendants.
20 Accordingly, Plaintiffs are entitled to injunctive relief to prevent the further
21 accessing, use, and dissemination of Plaintiffs' data.

22 117. The public disclosure of Plaintiffs' personal information has also
23 caused them to suffer monetary damages, at an amount to be proven at trial,
24 but in any event, in excess of \$75,000, exclusive of interest and costs.
25 Because Defendants' actions are intolerable in a civilized community,
26 Plaintiffs also seek punitive damages.

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FOR A FIFTH CAUSE OF ACTION AGAINST ALL DEFENDANTS
Invasion of Privacy by Intrusion
Upon Seclusion

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2 118. Plaintiffs incorporate and adopt by reference the allegations
3 contained in each and every preceding paragraph of this Complaint.

4 119. Plaintiffs have a legally protected privacy interest in their
5 personal information and email accounts, and had a reasonable expectation
6 that their information would remain private. Plaintiffs' accounts were
7 password protected, and at no time did Plaintiffs provide those passwords, or
8 the contents of their emails, to the public.

9 120. On information and belief, Defendant the State of Qatar, acting
10 by itself and/or through its agent Ooredoo and the Agent Defendants, hacked,
11 stole, doctored, and disseminated to others the personal and private
12 information of Plaintiffs. Defendants clearly did so without permission and
13 with deliberate intent to access and obtain Plaintiffs' personal and private
14 information. At no point did Plaintiffs authorize Defendants to hack, steal,
15 doctor, or disseminate their personal and private information.

16 121. On information and belief, Defendants' intentional intrusion
17 upon Plaintiffs' seclusion was highly offensive to Plaintiffs and would be
18 unjustifiable and highly offensive to an ordinary, reasonable person.

19 122. The public disclosure of Plaintiffs' personal information has
20 caused, and will continue to cause, Plaintiffs injury, including reputational
21 harm, an increased risk of further theft, and an increased risk of harassment.

22 123. Plaintiffs will continue to suffer this injury as long as their
23 personal information is available to Defendants and, subsequently, to media
24 organizations and the world at large. Plaintiffs' remedy at law is not itself
25 adequate to compensate for the injuries inflicted by Defendants. Accordingly,
26

1 Plaintiffs are entitled to injunctive relief to prevent the further accessing, use,
2 and dissemination of Plaintiffs' data.

3 124. The public disclosure of Plaintiffs' personal information has also
4 caused them to suffer monetary damages, at an amount to be proven at trial,
5 but in any event, in excess of \$75,000, exclusive of interest and costs.
6 Because Defendants' actions are intolerable in a civilized community,
7 Plaintiffs also seek punitive damages.

8 **FOR A SIXTH CAUSE OF ACTION AGAINST ALL DEFENDANTS**

9 **Conversion**

10 125. Plaintiffs incorporate and adopt by reference the allegations
11 contained in each and every preceding paragraph of this Complaint.

12 126. By hacking and stealing Plaintiffs' personal emails and
13 documents, along with Plaintiff Rosenzweig's passwords, Defendant the State
14 of Qatar, acting by itself and/or through its agent Ooredoo and the Agent
15 Defendants, took Plaintiffs' exclusive private and personal property.
16 Additionally, on information and belief, certain of the emails were doctored
17 and then deleted by Defendants from Plaintiffs' computers.

18 127. On information and belief, Defendants clearly engaged in these
19 actions without permission from Plaintiffs and with the deliberate intent to
20 access and obtain Plaintiffs' personal and private information. At no point did
21 Plaintiffs authorize Defendants to hack, steal, doctor, or disseminate their
22 exclusive personal and private information.

23 128. Plaintiffs will continue to suffer injury as long as their personal
24 information is available to Defendants and, subsequently, to media
25 organizations and the world at large. Plaintiffs' remedy at law is not itself
26 adequate to compensate for the injuries inflicted by Defendants. Accordingly,
27

1 Plaintiffs are entitled to injunctive relief to prevent the further accessing, use,
2 and dissemination of Plaintiffs' data.

3 129. The public disclosure of Plaintiffs' personal information has also
4 caused them to suffer monetary damages, at an amount to be proven at trial,
5 but in any event, in excess of \$75,000, exclusive of interest and costs.

6 130. Additionally, Defendants' actions were willful and malicious,
7 such that Plaintiffs are also entitled to punitive damages.

8 **FOR A SEVENTH CAUSE OF ACTION AGAINST ALL**
9 **DEFENDANTS**

10 **Civil Conspiracy**

11 131. Plaintiffs incorporate and adopt by reference the allegations
12 contained in each and every preceding paragraph of this Complaint.

13 132. On information and belief, Defendants willfully, intentionally,
14 and knowingly agreed and conspired with each other and with others to
15 engage in the wrongful conduct alleged herein, including but not limited to

- 16 a. Intentionally accessing Plaintiffs' accounts without
17 authorization and then stealing and/or doctoring Plaintiffs'
18 data and emails, in violation of the Computer Fraud and
19 Abuse Act, 18 U.S.C. § 1030(a)(2)(C) & (a)(5);
- 20 b. Knowingly accessing or causing to be accessed, and without
21 permission taking, altering, and making use of Plaintiffs'
22 programs, data, and files from Plaintiffs' computers, computer
23 systems, and/or computer networks, and/or knowingly and
24 without permission providing or assisting in providing a
25 means of accessing Plaintiffs' computers, computer systems,
26 and/or computer networks, in violation of the California

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Comprehensive Computer Data Access and Fraud Act, Cal. Pen. Code § 502;

- c. Intentionally receiving stolen property, in violation of Cal. Pen. Code § 496;
- d. Invading Plaintiffs’ reasonable privacy interests and then publicly disseminating Plaintiffs’ private information in a manner that is highly offensive to a person of reasonable sensibilities; and/or
- e. Taking and converting Plaintiffs’ exclusive private and personal property without permission and with deliberate intent to access and obtain Plaintiffs’ personal and private information.

133. On information and belief, Defendants performed the acts alleged pursuant to, and in furtherance of, their agreement and/or furthered the conspiracy by cooperating, encouraging, ratifying, and/or adopting the wrongful acts of others.

134. On information and belief, Defendants expressly or tacitly agreed to, at the very least:

- a. Devise and execute a scheme to access without permission, take, convert, alter, obtain, and use Plaintiffs’ private data and computer networks;
- b. Transfer and then disseminate the stolen private data; and/or
- c. Access, receive, and/or possess the stolen private information, all with the intent to harm Plaintiff Broidy, a private United States citizen residing in California.

