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8 Attorneys for Plaintiff  
9 ALI AL-AHMED

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 ALI AL-AHMED, ) CASE NO.:  
14 Plaintiff, )  
15 v. ) **COMPLAINT AND DEMAND**  
16 TWITTER, INC., ) **FOR JURY TRIAL**  
17 ALI HAMAD A ALZABARAH, and )  
18 AHMAD ABOUAMMO, )  
19 Defendants. )

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2 For his complaint, Plaintiff Ali Al-Ahmed (“Mr. Ahmed”), by and through its attorneys  
3 Gerstman Schwartz LLP, avers as follows:

4 **THE PARTIES**

5 1. Plaintiff Ali Al-Ahmed (hereinafter “Plaintiff” or “Mr. Al-Ahmed”) is one of the  
6 leading critics to the Kingdom of Saudi Arabia (hereinafter “KSA”) who resides, and has been  
7 granted asylum in, the United States, because as a political dissident and human rights  
8 advocate, he faced imminent persecution were he to return to his native country, Saudi Arabia.

9  
10 2. Defendant Twitter, Inc., (hereinafter “Twitter”) is incorporated in Delaware with  
11 its headquarters in San Francisco, California.<sup>1</sup>

12 3. In 2011, Saudi Prince Alwaleed Bin Talal (hereinafter “Bin Talal”) purchased \$300  
13 million worth of stock in Twitter. In 2015, Bin Talal made an additional investment, owning  
14 5.2% of the company, more than Twitter’s founder and CEO<sup>2</sup>. A January 29, 2018 article in  
15 the British newspaper, *The Daily Mail*, reported that after being imprisoned and perhaps  
16 tortured by KSA, Bin Talal signed over many of his assets to Crown Prince Mohammed Bin  
17 Salman (hereinafter “MBS”). According to *The Daily Mail*, a deal was allegedly made with  
18 MBS allowing MBS to seize control of these assets and those of other princes, so long as the  
19 assets remained in the United States.  
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23 <sup>1</sup> The term “Twitter” shall hereinafter refer to Twitter, Inc., its agents, employees, and assigns.

24 <sup>2</sup> Twitter’s April 20, 2016 Annual Proxy Statement, on page 56, confirms that HRH Prince Alwaleed Bin Talel  
25 Abudulziz Alsaud beneficially owned 4.99% of the company. A second amendment to a 13G filed with the Securities  
26 Exchange Commission on or about December 31, 2016 states that “based...on the [third quarter 10Q] percentage of  
27 class was reduced to 4.9%.” This auspicious reduction permitted the Kingdom to avoid future filing and disclosure  
28 requirements. A BBC report dated October of 2015 noted that “Prince Alwaleed bin Talal and his investment firm  
now owns just over 5%, which is more than Twitter's new chief executive Jack Dorsey. His cash injection comes at  
a critical time for Twitter, which is struggling to attract new followers. Saudi Arabia is said to be home to 40% of  
all active Twitter users in the Middle East.” <http://www.bbc.co.uk/newsbeat/article/34474798/meet-twitters-second-biggest-shareholder-saudi-prince-alwaleed-bin-talal>.

1           4.       Based on news reports indicating that 40% of all active Twitter users in the Middle  
2 East reside in the Kingdom, and this highly influential stake made in Twitter by a Saudi prince,  
3 Twitter's hiring of Saudi Nationals, who turned out to be Saudi agents, and its abject failure to  
4 properly safeguard Plaintiff's account takes on a new light. Plaintiff's personal and highly  
5 sensitive information, including confidential information provided by his followers and  
6 journalistic sources, was disclosed to third parties including, but not limited to, the KSA and  
7 its agents as a result of Defendants' recklessness, negligence, and, at times, intentional acts or  
8 omissions that appear to have been designed to appease a critical investor, MBS.

9  
10           5.       Defendant Ahmad Abouammo (hereinafter "Abouammo") is a dual citizen of the  
11 United States and Lebanon and resided in Walnut Creek, California, in the Northern District  
12 of California, from at least November 4, 2013, until May 22, 2015, and thereafter resided in  
13 Seattle, Washington. Abouammo was an employee of Twitter from on or about November 4,  
14 2013, to on or about May 22, 2015. Abouammo was a Media Partnerships Manager responsible  
15 for the Middle East and North Africa (MENA) region at Twitter. As a Media Partnerships  
16 Manager, Abouammo was involved in providing assistance for notable accounts, including  
17 accounts of public interest or belonging to brands, journalists, and celebrities in the MENA  
18 region, with content and Twitter strategy, and with sharing best practices.

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20           6.       Defendant Ali Hamad A Alzabarah (hereinafter "Alzabarah") is a citizen of Saudi  
21 Arabia and resided in San Bruno, California in the Northern District of California from at least  
22 August 12, 2013, until December 3, 2015. Alzabarah was an employee of Twitter from on or  
23 about August 12, 2013, to on or about December 4, 2015. While employed at Twitter,  
24 Alzabarah was a Site Reliability Engineer whose responsibility was maintaining Twitter's  
25 hardware and software to ensure uninterrupted service.

1 7. On November 19, 2019, Abouammo and Alzabarah were indicted for acting as  
2 agents for the government of Saudi Arabia who, while employed at Twitter, accessed user  
3 information without authorization and provided it to Saudi Arabian government officials.<sup>3</sup>  
4 Abouammo and Alzabarah gained access to dissidents and critics of the Saudi government  
5 including, upon information and belief, Mr. Al-Ahmed.

6  
7 8. Defendants Twitter, Abouammo, and Alzabarah shall hereinafter be referred to  
8 collectively as “Defendants.”

9 **VENUE AND JURISDICTION**

10 9. Jurisdiction is proper in this Court because this litigation arises under federal law,  
11 namely 18 U.S.C. §2701 et seq. (“Stored Communications Act”). Jurisdiction is also proper  
12 because this Court has diversity jurisdiction over this action and each Defendant under 28  
13 U.S.C. § 1331.

14  
15 10. The Court has supplemental jurisdiction over the state law claims asserted in this  
16 case under 28 U.S.C. § 1367 and 28 U.S.C. § 1362 because there is diversity of citizenship  
17 between the parties and the amount in controversy exceeds \$75,000.

18 11. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1391(c).

19 12. This Court has personal jurisdiction over Twitter because Twitter, on information  
20 and belief, conducts business in the State of California and within this district.

21 13. This Court has personal jurisdiction over Abouammo and Alzabarah because they  
22 resided, and were present in, the State of California and within this district when the acts  
23 alleged occurred.  
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27 <sup>3</sup> <https://www.justice.gov/usao-ndca/united-states-v-ahmad-abouammo>.

**GENERAL ALLEGATIONS**

***“Twitter being abused to instill fear, to silence your voice,  
or to undermine individual safety, is unacceptable.”***

-- @TwitterSafety, October 3, 2020<sup>4</sup>

14. Defendants have engaged in outrageous, irresponsible, and despicable conduct that should be punished to the maximum extent under the law.

15. This is an action to vindicate the rights of Mr. Al-Ahmed, a political refugee who has been granted political asylum in the United States from the despotic regime in the KSA. Because of the tremendous wealth of key figures in KSA, major corporations, including Twitter, have enabled, collaborated, colluded, conspired with, aided and abetted, and/or otherwise turned a blind eye to KSA’s efforts to suppress, torture, falsely imprison, terrorize, and murder dissenters both within Saudi Arabia and around the world.

**A. Allegations Relevant To All Causes Of Action**

16. Mr. Al-Ahmed is a leading voice of dissent casting an evidently unwanted magnifying glass upon the acts and omissions, policies and, at times, alleged crimes conducted on behalf of, or with the knowledge and consent of, the KSA or elements within the KSA. Mr. Al-Ahmed is also one of the most active and courageous journalists within the United States covering the KSA. Through his prominent social media presence, and persistent critique of the KSA, Mr. Al-Ahmed has brought broad awareness to issues of social and political concern including allegations of KSA human rights violations, KSA links to international terrorism, and KSA corruption within the Kingdom.

17. It is not an overstatement to suggest that Mr. Al-Ahmed has become a thorn in the side of the KSA. Indeed, he would not dispute that he has made it his life’s work to counter KSA propaganda and expose systemic corruption, violence, and police state tactics within the KSA, and to counter the KSA’s efforts to masquerade itself as a modern nation. As a

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<sup>4</sup>Twitter Safety (@TwitterSafety), Twitter (Oct. 3, 2020), <https://twitter.com/TwitterSafety/status/1312498519094091779> (on file with the *Columbia Law Review*) (emphasis added).

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