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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JANE DOE 1, Individually and on behalf of Proposed Class Members;
JOHN DOE 1, Individually and on behalf of Proposed Class Members;
JOHN DOE 2, Individually and on behalf of Proposed Class Members;
JENNA ROE 3, Individually and on behalf of Proposed Class Members;
JAMES DOE 4, Individually and on behalf of Proposed Class Members;
JOHN DOE 5, Individually and on behalf of Proposed Class Members;
JENNA DOE 6, Individually and on behalf of Proposed Class Members;
JANE DOE 2, Individually and on behalf of Proposed Class Members;
JENNA DOE 7, Individually and on behalf of Proposed Class Members;
JENNA DOE 8, Individually and on behalf of Proposed Class Members;
JOHN DOE 9, Individually and on behalf of Proposed Class Members;
JENNA DOE 10, Individually and on behalf of Proposed Class Members;
JENNA DOE 11, Individually and on behalf of Proposed Class Members;
JANE DOE 3, Individually and on behalf of Proposed Class Members;
JOHN DOE 12, Individually and on

Case No. CV:

**CLASS COMPLAINT FOR
INJUNCTIVE RELIEF AND
DAMAGES**

JURY TRIAL DEMANDED

behalf of Proposed Class Members; and JOHN DOE 13, Individually and on behalf of Proposed Class Members; all Plaintiffs C/O 621 Maryland Ave. NE, Washington, D.C. 20002

Plaintiffs,

v.

APPLE INC. 1 Infinite Loop Cupertino, CA 95014; ALPHABET, INC. 1600 Amphitheatre Parkway, Mountain View, California 94043; MICROSOFT, INC., 1 Microsoft Way, Redmond WA 98052; DELL TECHNOLOGIES, INC., 1 Dell Way, Round Rock, TX 78682; and TESLA, INC., 3500 Deer Creek Rd, Palo Alto, CA 94304.

Defendants.

I. NATURE OF THE ACTION

1. Defendants Apple Inc. (“Apple”), Alphabet, Inc. (“Alphabet”)(which is the parent company of Google LLC)(“Google”), Dell Technologies Inc. (“Dell”), Microsoft Inc. (“Microsoft”), and Tesla Inc. (“Tesla”) are knowingly benefiting from and aiding and abetting the cruel and brutal use of young children in Democratic Republic of Congo (“DRC”) to mine cobalt, a key component of every rechargeable lithium-ion battery used in the electronic devices these companies manufacture. The young children mining Defendants’ cobalt are not merely being forced to work full-time, extremely dangerous mining jobs at the

expense their educations and futures; they are being regularly maimed and killed by tunnel collapses and other known hazards common to cobalt mining in the DRC. The following photo is of Plaintiff John Doe 5's crushed legs. He was mining cobalt in a tunnel with no supports for Congo Dongfang Mining, which is part of Huayou Cobalt, which sells cobalt to Defendants Apple and Microsoft. He is typical of the young men maimed by cobalt mining in the DRC, where production has soared under extremely primitive conditions to meet the demand for cobalt caused by the tech boom led by Defendants.



Plaintiff John Doe 5's crushed legs

2. Defendants Apple, Alphabet, Dell, Microsoft, and Tesla are merely the latest to join the list of rapacious exploiters that have given the DRC a particularly horrific history of being pillaged and plundered and its people brutalized and

exploited. The area that is now the DRC had a relatively large population and was fertile ground for the slave traders. Estimates are that between the 16th and 19th centuries, several million slaves were taken from the Congo basin alone. In the mid-19th century, when slavery was finally made illegal in most of the world, the Congo received a brief respite. However, as industrialization began in earnest, a new breed of greedy exploiters returned to Africa to brutalize and enslave people in their home countries to extract natural resources. In the late 1880's, King Leopold II of Belgium seized the Congo as his personal private property in his bid to be a colonial power. While purporting to bring Christianity and civilization to the "Congo Free State", he instead deployed a brutal private army to impose a system of forced labor through strict quotas to compel villagers to deliver ivory to his collectors. Then, the rubber craze hit and, unfortunately for the people of the Congo, the forests of the Congo grew natural rubber trees. Leopold imposed a second brutal quota system on villagers to harvest raw latex to make rubber. Villages that did not cooperate were destroyed and noncompliant workers were punished with amputation by machete or execution. The horrors of this period are graphically depicted in Adam Hochschild's book, *King Leopold's Ghost*, as well as in Joseph Conrad's *Heart of Darkness*.

3. Shortly before Leopold's death in 1909 he sold the Congo Free State to the Belgian state, a transaction that merely changed the beneficiaries of the brutal exploitation of the people and resources of the Congo. When Independence finally

came to the DRC¹ in 1960, the people then suffered through some of the most corrupt leaders imaginable. In succession, Mobutu Sese Seko, Laurent-Désiré Kabila, and Joseph Kabila, each stole more than the last while the people of the DRC lived in extreme poverty.

4. The modern tech boom brought on a new wave of brutal exploitation to the people of the DRC. The DRC is particularly rich in many minerals needed for the manufacture of the various products made by Defendants Apple, Alphabet, Dell, Microsoft, and Tesla. The DRC is rich in tin, copper, tungsten, gold, and tantalum, but these minerals are widely available in other places. On the other hand, approximately two-thirds of the global supply of cobalt is mined in the “copper belt” region of Haut-Katanga and Lualaba Provinces in the DRC. Cobalt is a key component of every rechargeable lithium-ion battery in all of the gadgets made by Defendants and all other tech and electric car companies in the world,² that has brought on the latest wave of cruel exploitation fueled by greed, corruption and indifference to a population of powerless, starving Congolese people.

5. The Plaintiffs here are a representative group of children who were forced by extreme poverty to leave school and pursue the only economic option in their

¹ The country was first called the Republic of Congo, then the DRC, then Zaire, then back to the present name of DRC.

² Plaintiffs have brought suit against a first group of companies, Defendants Apple Inc., Alphabet Inc., Dell Inc., Microsoft Inc., and Tesla, based on a number of factors. Plaintiffs are conducting additional research and expect to add others using cobalt from the DRC that is mined by young children performing hazardous work and facing extreme danger.

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