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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9

10 Jane Doe, individually, and on behalf §
11 of all others similarly situated; John §
12 Doe, individually, and on behalf of all §
13 others similarly situated §
DOES plaintiffs 1 through 1000, §

14 Plaintiffs, §

15 vs. §

16 Ivo Tanku Tapang, an individual; and §
17 DOES 1 through 5000. §
18 Defendants. §

Case No.:

**COMPLAINT FOR DAMAGES,
INJUNCTION AND
DECLARATORY RELIEF**

- 1. FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES PURSUANT TO THE ANTI-TERRORISM ACT;
- 2. FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES PURSUANT TO STATE TORT LAW;
- 3. FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES PURSUANT TO THE ALIEN TORT CLAIMS ACT;
- 4. FOR RICO (18 U.S.C. § 1962(C))
- 5. FOR RICO CONSPIRACY (18 U.S.C. § 1962(D))
- 6. LIABILITY FOR AIDING AND ABETTING ACTS OF INTERNATIONAL

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- TERRORISM PURSUANT TO
18 U.S.C. § 2333(a)
- 7. LIABILITY FOR CONSPIRING
IN FURTHERANCE OF ACTS
OF INTERNATIONAL
TERRORISM PURSUANT TO
18 U.S.C. § 2333(a)
- 8. PROVISION OF MATERIAL
SUPPORT TO TERRORISTS IN
VIOLATION OF 18 U.S.C.
§2339a
- 9. NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS

DEMAND FOR JURY TRIAL

I. INTRODUCTION

This case concerns plaintiffs, Jane Doe and John Doe, U.S. citizens and resident of this County where this court is venued for Jane Doe, resident of Los Angeles county for John Doe, on behalf of themselves and all others similarly situated, who have suffered the death of beloved parents, children and siblings, and resulting from that, suffered severe emotional distress, harassment, anxiety, suffering, sleepless nights and other assorted grief and anguish due to the conduct, actions, participation, and material support of defendant Tapang Ivo Tanku (“Tapang”) to his agents, joint venturers, forces, organization named Ambazonia Defense Forces (“ADF”) which culminated in the death of plaintiff Jane Doe’s father and brother on May 20, 2018, and Plaintiff John Doe’s father in August of 2018.

Plaintiff Jane Doe files this complaint on behalf of herself, and others similarly situated, approximated in the thousands, residing here in the United States, citizens or residents of the United States, and/or Cameroonians, but who have lost loved ones and family, pain and anguish and suffering, due to the conduct and actions of defendant Tapang. Plaintiff John Doe files similarly.

Defendant Tapang, from what he presumes is a safe harbor hiding place at his San Jose residence in the USA, while he engages in terrorist acts occurring in Cameroon, has spectacularly and beyond any reasonable doubt (see Exhibits A and B charts illustrating over one hundred posts and videos, and hyperlinks to Tapang’s postings and links to his video posts, with all charts information and accompanying links documents and videos, fully incorporated herein) conducted himself and acted, participated, and materially supported actions by the ADF, for which he is the spokesperson, which has lead not just to the death of plaintiffs father and brother, but also of hundreds of innocent civilians.

Terrorism is broadly defined as “the unlawful use of violence and intimidation, especially against civilians, in the pursuit of political aims as,” and “international

1 terrorism,” according to 18 U.S.C. § 2331 as “activities that involve acts or acts
2 dangerous to human life that are in violation of the criminal laws of the United States
3 or of any State, that would be a criminal violation if committed within the jurisdiction
4 of the United States or of any State.” The conduct, actions, participation, and material
5 support of Tapang to the events of the May 20th attacks in Cameroon is terrorism in
6 miniature, as well as all other ADF and armed separatist groups attacks on innocent
7 civilians in the North West and South West regions of Cameroon. Because of the
8 foregoing, there can be no doubt: **Tapang is a terrorist, and one of the highest**
9 **order.** He must be stopped. While Tapang and his ilk will surely seek to hide behind
10 the protections of Constitutional First Amendment Rights to free speech, this case is
11 not about inhibiting their rights to free speech, or to engage in political advocacy, or
12 as a rights group, and it expressly disavows any such intentions, but it is about their
13 conduct, actions, material support, and participation in terrorism, which lead to
14 plaintiffs injuries. Tapang has engaged in conduct and actions equating to “training”,
15 “expert advice or assistance,” “service”, and providing “personnel” to the Ambazonia
16 Defense forces and its fighters, leading to deaths of innocent civilians, including the
17 parents and siblings of plaintiffs.

18 To better understand this case, a brief synopsis of the background of this matter
19 will be enlightening. Tapang is the spokesperson for a group that hails itself as
20 Ambazonia Defense Forces (“ADF”) with a stated political aim of secession or
21 separation from the Republic of Cameroon. However, in seeking that political goal,
22 Tapang, his agents, joint venture associates, co-conspirators, ADF and related
23 organizations, engage in acts of terrorism against innocent civilians that do not
24 subscribe to their stated political goal of separation from the Republic of Cameroon
25 to form an Ambazonia state, and it is such actions that led to the death of plaintiff Jane
26 Doe’s father and brother, plaintiff John Doe’s father, and sufferings of plaintiff
27 residing here in the USA. This same story is applicable to all other plaintiffs, US

1 residents and citizens, victims of Tapang’s conduct and actions that constitute material
2 support of terrorism, which he conducts from within the territorial jurisdiction of the
3 United States.

4 The loss of one’s life is never adequately compensated by monetary
5 compensation. Accordingly, this complaint will also seek a preliminary and
6 permanent injunction, as well as declaratory relief, against any and all conduct,
7 actions, participation, and material support of terrorism against Tapang, his
8 organizations, supporters, accomplices, and DOES defendants, who will be named
9 once discovery gets going and they are identified.

10 Plaintiffs will file, as appropriate, criminal complaints with the FBI offices with
11 jurisdiction over Tapang’s residence, police reports with local police terrorism units,
12 as well as complaints with the immigration authorities for his immigration law
13 violations. Plaintiffs seek, and will get, God willing, justice for themselves and all
14 others similarly situated.

15 NATURE OF ACTION

16 1. This is an action for damages against Ivo Tanku Tapang and DOES 1-
17 5000, pursuant to the Antiterrorism Act, 18 U.S.C. § 2333 (“ATA”) for aiding,
18 abetting, and knowingly providing material support and resources to the Ambazonia
19 Defense Forces (ADF) and other armed militia groups that carried out May 20th
20 attacks that killed plaintiff Jane Doe’s father and brother, plaintiff John Doe’s father,
21 as wells attacks throughout circa October 2016 to present that has killed hundreds of
22 innocent civilians, who are the parents, children, and spouses, of US citizens and
23 residents natives of Cameroon.

24 2. The ATA’s civil remedies have served as an important means for
25 enforcing the federal criminal anti-terrorism provisions since the early 1990s.

26 3. Congress enacted the ATA in October 1992 as a legal complement to
27 criminal penalties against terrorists that kill or injure Americans abroad, specifically

1 intending that the civil provisions would not only provide a mechanism for
2 compensating victims of terror but also serve as an important means of depriving
3 terrorists of financial resources to carry out attacks.

4 4. Following the bombing of the World Trade Center in New York by al-
5 Qaeda in 1993, Congress targeted terrorist resources again by enacting 18 U.S.C. §
6 2339A in September 1994, making it a crime to provide material support or resources
7 knowing or intending that they will be used in preparing or carrying out terrorist acts.

8 5. In April 1996, Congress further expanded the effort to cut off resources
9 to terrorists by enacting 18 U.S.C. § 2339B, making it a crime to knowingly provide
10 material support or resources to a designated foreign terrorist organization.

11 6. In the wake of the terror attacks on the United States by al-Qaeda on
12 September 11, 2001 killing nearly 3,000 Americans, Congress amended the “material
13 support” statutes, 18 U.S.C. §§ 2339A-B, via the PATRIOT Act in October 2001 and
14 the Intelligence Reform and Terrorism Prevention Act of 2004, to impose greater
15 criminal penalties for violating these statutes and to expand the definition of “material
16 support or resources” prohibited thereby.

17 7. The Ambazonia Defense Forces (“ADF”), of which Tapang is the
18 spokesperson, is the "official" military wing of the Ambazonian separatist movement,
19 and although other smaller, independent militias exist, they tend to cooperate closely
20 with the ADF if not absorb into it altogether.

21 8. Officially, ADF aims to raise the cost of Cameroon's military presence in
22 the region higher than the profits the country gets from there; their aim is to make
23 North-West and South-West regions of Cameroon “ungovernable”, and to coerce,
24 intimidate, kill, kidnap, harm any innocent civilians who do not obey or agree or
25 subscribe to their political goals.

1 14. Plaintiffs' claims are based not upon the speech communications of
2 Tapang and Does defendants on social media postings, but upon Defendants provision
3 of the infrastructure, platform, which provides material support to ADF and related
4 armed militia in Cameroon.

5 **THE PARTIES**

6 15. Jane Doe, a resident of this County, along with her siblings lost their
7 father in the May 20th attacks in Kumbo as further detailed below. Jane Doe is a citizen
8 of the United States. The nondisclosure of Jane Doe's identity is necessary for Jane
9 Doe and her family's life, as Tapang and his ADF are currently operational and
10 engaging in consistent acts of terrorism. As the 9th Circuit has held, pseudonyms may
11 be used to protect a party from "injury", and "a party may preserve his or her
12 anonymity in judicial proceedings in special circumstances when the party's need for
13 anonymity outweighs prejudice to the opposing party and the public's interest in
14 knowing the party's identity." *Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d
15 1058, 1067-68 (9th Cir. 2000)(quoting *United States v. Doe*, 655 F.2d 920, 922 n.1
16 (9th Cir. 1981). Plaintiffs will seek leave of court to proceed under a pseudonym.

17 16. John Doe, a resident of Los Angeles County, along with his mother and
18 siblings, lost their father, due to the actions of Tapang providing material support to
19 ADF forces, who killed their father because he allegedly cooperated with the
20 government of Cameroon. The nondisclosure of John Doe's identity is necessary for
21 John Doe and his family's life, as Tapang and his ADF are currently operational and
22 engaging in consistent acts of terrorism. As the 9th Circuit has held, pseudonyms may
23 be used to protect a party from "injury", and "a party may preserve his or her
24 anonymity in judicial proceedings in special circumstances when the party's need for
25 anonymity outweighs prejudice to the opposing party and the public's interest in
26 knowing the party's identity." *Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d
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1 1058, 1067-68 (9th Cir. 2000)(quoting *United States v. Doe*, 655 F.2d 920, 922 n.1
2 (9th Cir. 1981). Plaintiffs will seek leave of court to proceed under a pseudonym.

3 17. DOES Plaintiffs 1 -1000 are nationals of Cameroon, whether living in
4 the USA or in Cameroon, who have suffered injury or harm, whether to themselves,
5 or death of their parents and siblings, due to the actions of Tapang and DOES
6 Defendants. Plaintiffs have setup a website, www.cameroonvictims.org, where
7 similar plaintiffs, whether residing in the USA or in Cameroon, may submit in
8 confidentiality the story of their loss, so that plaintiff's attorney may join them in this
9 lawsuit.

10 18. Defendant Ivo Tanku Tapang, an individual, resides within this district,
11 in San Jose, California. A substantial portion of his material support activities were
12 conducted within this district.

13 19. DOES defendants 1 through 5000 are US residents, nationals, citizens,
14 who are natives of Cameroon, who have provided financial and other material support,
15 including training, expert advice or assistance, service, and personnel, to named
16 defendant Tapang Ivo, his ADF, agents, fighters, and related organizations, in
17 violation of Federal and State Anti-terrorism laws, and other criminal statutes.

18 20. DOES defendants 1 through 5000 are US residents, nationals, citizens,
19 who are natives of Cameroon, whose conduct, voluntary or involuntary, supports or
20 promotes the goals of Tapang Ivo, his ADF, agents, fighters, and related organizations
21 in violation of Federal and State Anti-terrorism laws, and other criminal statutes.

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23 **JURISDICTION AND VENUE**

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25 21. The Court has jurisdiction over this case under 28 U.S.C. §1331 (federal
26 question jurisdiction); and 28 U.S.C. §1332 (diversity jurisdiction).

1 by the tortious act or omission of the Tapang Ivo and/or one or more of his agents or
2 partners acting within the scope of their agency or partnership.

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4 **II. FACTUAL ALLEGATIONS**

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6 **A. LEGAL BACKGROUND: ANTITERRORISM LEGISLATION**

7 i. The Antiterrorism Act (“ATA”)

8 28. In the 1980’s, terrorist groups carried out a number of major terror
9 attacks around the world, killing and injuring many Americans abroad.

10 29. Among these terror attacks were:

- 11 a. The April 1983 suicide bombing of the U.S. Embassy in Beirut, Lebanon,
12 killing 63 people, including 17 Americans;
- 13 b. The October 1983 suicide bombing of U.S. Marine barracks in Beirut,
14 Lebanon, killing 241 U.S. Marines and injuring more than 100;
- 15 c. the December 1983 terrorist bombings of the U.S. Embassy and the
16 residential quarters of American company Raytheon in Kuwait;
- 17 d. The September 1984 terrorist bombing of a U.S. Embassy annex
18 northeast of Beirut, Lebanon;
- 19 e. The June 1985 hijacking of TWA flight 847;
- 20 f. The October 1985 hijacking of the Achille Lauro cruise ship and murder
21 of wheelchair-bound American Leon Klinghoffer; and
- 22 g. The December 1985 terrorist bombings of the Rome and Vienna airports.

23 30. In response to these attacks, Congress in 1986 amended the U.S. Criminal
24 Code, Title 18, Part I, to add a new chapter titled, “Extraterritorial Jurisdiction Over
25 Terrorist Acts Abroad Against United States Nationals.”

1 31. This new chapter contained a new section titled, “Terrorist acts abroad
2 against United States nationals,” providing criminal penalties for killing, conspiring,
3 or attempting to kill a national of the United States, or engaging in physical violence
4 with the intent to cause serious bodily injury to a national of the United States or that
5 results in serious bodily injury to a national of the United States.

6 32. In addition, Congress later enacted the ATA, which established a private
7 cause of action for U.S. nationals injured by acts of international terrorism, as a legal
8 complement to the criminal penalties against terrorists that kill or injure Americans
9 abroad.

10 33. In enacting the ATA, Congress specifically intended that the civil cause
11 of action would not only provide a mechanism for compensating victims of terror, but
12 also serve as an important means of depriving terrorists of financial resources to carry
13 out attacks.

14 34. As the ATA was being considered in Congress, the State Department’s
15 Deputy Legal Advisor, Alan J. Kreczko, testified before the Senate Judiciary
16 Committee’s Subcommittee on Courts and Administrative Practice that this proposed
17 bill “will add to the arsenal of legal tools that can be used against those who commit
18 acts of terrorism against United States citizens abroad.”¹

19 35. The Deputy Legal Advisor also testified:

20 “[T]his bill will provide general jurisdiction to our federal courts and a cause of
21 action for cases in which an American has been injured by an act of terrorism
22 overseas.

23 We view this bill as a welcome addition to the growing web of law we are
24 weaving against terrorists. . . . The existence of such a cause of action . . . may
25 deter terrorist groups from maintaining assets in the United States, from
benefiting from investments in the U.S. and from soliciting funds within the

26 ¹ “Statement of Alan J. Kreczko, Deputy Legal Adviser, On S. 2465: A bill to provide a new civil cause
27 of action in federal court for terrorist acts abroad against United States nationals,” Before the
Subcommittee on Courts and Administrative Practice of the Senate Judiciary Committee (July 25,
1990), <https://www.state.gov/documents/organization/28458.pdf>.

1 U.S. In addition, other countries may follow our lead and implement
2 complimentary national measures, thereby increasing obstacles to terrorist
operations.

3 Moreover, the bill may be useful in situations in which the rules of evidence or
4 standards of proof preclude the U.S. government from effectively prosecuting
5 a criminal case in U.S. Courts. Because a different evidentiary standard is
involved in a civil suit, the bill may provide another vehicle for ensuring that
terrorists do not escape justice.”²

6 36. Likewise, Senator Grassley, one of the sponsors of the bill,
7 explained a purpose of ATA’s civil cause of action as follows:
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9 “The United States must take a strong stand against terrorism. The Department
10 of State testified that this bill would add to the arsenal of legal tools that can be
used against those who commit acts of terrorism against U.S. citizens abroad.

11 . . .

12 Now is the time for action. Now is the time to strengthen our ability to both
deter and punish acts of terrorism.

13 We must make it clear that terrorists’ assets are not welcome in our country.
14 And if they are found, terrorists will be held accountable where it hurts them
most: at their lifeline, their funds.”³

15 37. In July 1992, a Senate Committee Report explained that the ATA’s
16 treble damages provision “would interrupt, or at least imperil, the flow of money” to
17 terrorist organizations.

18 38. In October 1992, Congress enacted ATA’s civil provisions,
19 including 18 U.S.C. §2333.

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21 **B. The “Material Support” Statutes and Regulations**
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26 ² Id.

27 ³ 36 Cong. Rec. 26716-26717 (Oct. 1, 1990), [https://www.gpo.gov/fdsys/pkg/GPO-CRECB-1990-
28 pt19/pdf/GPO-CRECB-1990-pt19-1.pdf](https://www.gpo.gov/fdsys/pkg/GPO-CRECB-1990-pt19/pdf/GPO-CRECB-1990-pt19-1.pdf).

1 39. On February 26, 1993, a group of *al-Qaeda* terrorists detonated a truck
2 bomb under the North Tower of the World Trade Center in New York City, attempting
3 to cause the collapse of both towers and the death of thousands of Americans.

4 40. Although the damage from the World Trade Center bombing was
5 limited, it nevertheless killed six people and injured more than one thousand.

6 41. In response, Congress again took aim at the resources available to
7 terrorists in September 1994 and enacted 18 U.S.C. § 2339A, making it a crime to
8 provide material support or resources to terrorists, knowing or intending that they
9 would be used for terrorist acts.

10 42. Tapang and DOES defendants engage in the provision of material
11 support of terrorism through their ADF and its agents and soldiers, ad defendants
12 conduct through fund raising meetings, declarations for actions which incite
13 immediate and imminent hard to innocent civilians, their officially declared aim of
14 conduct intimidation and threats against civilians, of kidnappings, and their
15 acknowledged kidnappings, killings, of civilians they find non-compliant with their
16 civilian goals. Tapang provides expert advice or assistance, personnel, training, and
17 service to the ADF and related armed militia who conduct acts of violence,
18 intimidation, killings against civilians in the Anglophone regions of Cameroon.

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**PLAINTIFF SPECIFIC FACTUAL ALLEGATIONS AGAINST
TAPANG AND HIS ORGANIZATION ADF**

29 43. Plaintiffs, still with a heavy heart from her loss, and mindful that she is
30 going up against defendant Tapang, a terrorist, who does not value human life, and
31 who has terrorist ADF forces at this disposal, beck and call who may wreck further
32 unimaginable pain to her and family at his instructions, however, bravely, by and
33 through their undersigned counsel, hereby further specifically allege :

34 44. Plaintiffs, individually and on behalf of those similarly situated, are the
35 surviving children of the victims murdered in the May 20, 2018 terrorist attacks which
36 killed plaintiffs' father and brother in Kumbo, Bui Division, North-West Region,
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1 Cameroon. (the "May 20th Attacks") and individuals who suffered personal injuries
2 in the May 20th Attacks incited, participated, assisted, contributed materially,
3 organized, and supported by defendant Tapang Ivo, as well as all those innocent
4 civilians who have suffered similar losses circa October 2016 to present due to the
5 conduct and material support of Tapang and his accomplices, ADF, and Doe
6 defendants.

7 45. Plaintiffs seek such relief against the Tapang Ivo for the attributable acts
8 of the Ambazonia Defense Forces and its bodies, alter -egos, and officers, employees
9 and agents acting within the scope of their office, employment or agency by Tapang
10 knowingly providing material support and resources to the Ambazonia Defense
11 Forces terrorist organization and facilitating the May 20th Attacks, deaths of hundreds
12 of others, in that, as set forth in detail herein, he:

- 13 a. Raised, laundered and paid substantial financial support to Ambazonia
14 Defense Forces to fund its budget and terrorist activities, including the
15 preparation and execution of the May 20th Attacks, and scores of other
16 violence, intimidation of civilians, and destruction of property.
- 17 b. Funded the terrorist training camps in the North-West and South-West
18 regions of Cameroon where Ambazonia Defense Forces indoctrinated
19 and taught their soldiers how to carry out guerilla warfare, intimidation,
20 violence, and terrorism against any military or uncooperative or
21 unsupportive civilians.
- 22 c. Provided critical logistical support and resources to Ambazonia Defense
23 Forces around North-West and South-West regions of Cameroon,
24 funding safe houses, transferring Ambazonia Defense Forces money,
25 weapons and equipment across international borders and other
26 assistance, all of which enabled Ambazonia Defense Forces to conduct
27 the May 20th Attacks and kills scores of other civilians;

1 d. Actively supported Ambazonia Defense Forces in its final preparations
2 for the May 20th Attacks through a network of the their soldiers, officers,
3 and/or agents who met with and aided the ADF killers, providing them
4 with money, cover, advice, contacts, transportation, assistance and other
5 material support and resources.

6 46. Provides expert advice or assistance to the ADF and related organizations
7 through his regular Facebook postings, YouTube videos, which advises the ADF
8 fighters how, when, to act, stance to adopt, how to react, and instructions on
9 punishments to meter to innocent civilians who don't obey, including plaintiffs
10 parents.

11 47. Similar to paragraph 50 above, Tapang provides the afore-noted services
12 to the ADF and related organizations as described in paragraph 50. These services also
13 recruit "personnel" for the ADF and related organizations, serve as media and public
14 relations for the ADF and related organizations and armed militia groups.

15 48. Provides ADF and the armed militia with training on how to engage in
16 subterfuge, propaganda, to achieve their goals of separation from the Republic of
17 Cameroon.

18 49. All the above-noted actions are in violation of 18 U.S.C. §§ 2339A, the
19 statute that prohibits the provision of material support with the knowledge or intent
20 that the support be used to carry out a terrorist attack.

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22 **DOCUMENTS AND POSTS BY TAPANG SUPPORTING ALL**
23 **FACTUAL ALLEGATIONS**

24 50. Attached as **Exhibit A** to this complaint is conduct and postings and
25 articles detailing specific conduct and material support by Tapang noted in paragraphs
26 43 through 53, that are directed to inciting, and in fact do incite, imminent lawless
27 action, with such conduct and speech, not only likely to produce such lawless action,

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1 but actually did produce the lawless action, including but not limited to, the May 20th
2 attacks where plaintiffs father and brother died, as well as loss of hundreds of innocent
3 civilian lives in the North-West and South-West regions, terrorizing students from not
4 going to school for over two years and ongoing, from late 2016 to present, disruption
5 of business and commercial activities, and instigating fear in all civilians in these
6 regions to adhere strictly to the edicts from defendant Tapang and his organization.

7 51. Exhibit A reflects plaintiffs' allegations that Tapang's conduct, actions,
8 and speech intended to incite a violent or lawless action, and that the action was likely
9 to imminently occur, and in fact did occur repeatedly, as a result.

10 **VIDEOS OF TAPANGS CONDUCT AND ACTIONS SUPPORTING**
11 **ALL FACTUAL ALLEGATIONS**

12 52. Attached as **Exhibit B** to this Complaint is the table comprising 37
13 separate columns of videos, noting date of video and title of video, illustrating the
14 conduct, actions, and speech of Tapang showing his material support of ADF
15 terrorism in general, the May 20th attacks, and ongoing, and evidencing his material
16 support of training, expert advice or assistance, service, and personnel provided to the
17 ADF and related militia.

18 **Ivo Tapang's knowledge of Ambazonia Defense Forces and its terrorist**
19 **agenda against decedents prior to May 20, 2018 and continuing.**

20 53. In a wide variety of actions and conduct leading to the attacks on May
21 20, 2018, which caused Jane Doe's father's death, Ivo Tapang promised death, harm,
22 retribution, and injury to any civilians who dared to support the May 20th
23 Independence day celebrations of the Republic of Cameroon, as well as since October
24 2016, has consistently supported violence, intimidation, and criminal acts against
25 civilians who do not strictly abide by his organization's edicts, such as, "ghost town",
26 where all shops must be closed, and "no schools," a prohibition against students
27 returning to school until his aim of an independent Ambazonia state is achieved.

1 54. At all relevant times mentioned herein, Ivo Tapang: adopted an extremist
2 version of secession, seeking violence and terror and kidnappings and intimidation
3 against any non-compliant civilian as the means to achieve secession from the
4 Republic of Cameroon.

5 55. As detailed herein, Ivo Tapang's ADF agents, partners, and joint venture
6 associates, continued to provide material support and resources for Ambazonia
7 Defense Forces through late 2016, and including May 20, 2018 to present, combined
8 actions that led to plaintiffs parents death, and the deaths of hundreds of others.

9
10 **Ivo Tapang's tortious acts were a proximate cause of the May 20th Attacks**
11 **and the killings of hundreds of civilians.**

12 56. The planning for the May 20th Attacks began, on information and belief,
13 on or about March of 2018, as Tapang decided to forcefully stop and any all May 20th
14 (which is Cameroon's Independence Day) celebrations in the North-West and South-
15 West Regions.

16 57. Tapang and his accomplices, and DOES defendants, set in motion, a
17 series of postings, threats, warnings, to any Anglophone civilian who dares venture
18 outside to acknowledge or "celebrate" the 20th of May independence day, that is,
19 customarily, a cause of celebration in prior years throughout the Republic of
20 Cameroon.

21 58. On that fateful day, Jane Doe's father and brother, being present in
22 Kumbo, and having been suspected of being sympathizers to the government of
23 Cameroon, were shot down by fighters of ADF for "leaving their home."

24 59. A witness to the incident stated that Jane Doe's father had been sick for
25 a few days, and it was urgent that his son take him to the hospital, and when his
26 condition deteriorated drastically on the morning of May 20th, they had no choice but
27 to try to seek medical attention and leave their residence. Yet, in using the material

1 support provided by Tapang, ADF fighters mercilessly killed Jane Doe's father and
2 brother as suspected sympathizers of Cameroon's government and for violating their
3 strict edict for no May 20th celebrations.

4 60. As detailed herein, at each stage of Ambazonia Defense Forces' planning
5 and execution leading up to the May 20th Attacks, Ivo Tapang knowingly provided
6 Ambazonia Defense Forces with support, financing and resources that were material,
7 substantial and critical to the success of the May 20th Attacks.

8 61. John Doe's father was killed by Tapang's ADF because, as they stated
9 and posted his dead body in social media groups, he was a traditional ruler and spy of
10 the Cameroon government.

11 **Ivo Tapang's direct funding of ADF**

12 62. Ivo Tapang is responsible for coordinating and raising substantial
13 funding of Ambazonia Defense Forces that was vital to the operation of that terrorist
14 organization and its preparations for and realization of the May 20th Attacks, as well
15 as all other attacks and killings of innocent civilians from late 2016 to present,
16 including but not limited to the following:

17 63. Top ranking Ivo Tapang sympathizers made substantial financial
18 contributions to Ambazonia Defense Forces;

19 64. From 2017 through and including May 20, 2018, Ivo Tapang, acting
20 through his agents, joint venture associates, and partners, including Does Defendants
21 1-5000, have raised money through meetings, groups, social media, to support their
22 ADF fighters and related organizations in executing their stated political aims and
23 official positions, which includes terrorism as defined in USC code against innocent
24 civilians. Some of these civilians have relatives abroad here in the USA, and their
25 death, torture, kidnapping directly affects their USA citizen families.

Ivo Tapang's material support of ADF camps used to indoctrinate and provide terrorist training for ADF soldiers

65. Tapang’s ADF fighters and others involved in supporting the May 20th Attacks, and the violence and armed separatist groups from late 2016 to present, were indoctrinated and given their terrorist training necessary to prepare for and execute the May 20th Attacks and other attacks at one or more Ambazonia Defense Forces terrorist training camps located in the bushes of the North-West and South-West regions, far from where there are roads or easy accessibility.

66. Prior to and including May 20, 2018, to present, Ivo Tapang provided logistical support to Ambazonia Defense Forces in additional ways, as will be determined through further investigation, disclosures and discovery of Ivo Tapang.

Ivo Tapang's material support for Ambazonia Defense Forces’ planning and execution of the May 20th Attacks, and numerous other attacks against innocent civilians, students, and government officials.

67. Ivo Tapang provided material support and resources for Ambazonia Defense Forces and their fighters directly linked to the actual planning and execution of the May 20th Attacks, numerous other attacks in hundreds from late 2016 to present, attacks against students who seek to go to school, government officials, including but not limited to the following:

- i. Fund raising
- j. Using his Facebook posts to provide instructions on strategy, policy, and ADF regulations
- k. Recruiting of fighters
- l. Assistance with procuring and providing weapons, equipment, and other tangible materials.
- m. Coordination with other separatists groups abroad and in Cameroon
- n. Leadership of the ADF in the USA

- 1 o. Expert advice and assistance on how to obtain separation by violence and
- 2 force from Cameroon
- 3 p. Assistance with the training of ADF fighters
- 4 q. Using other social media such as email, twitter, Skype, WhatsApp to
- 5 promote ADF violent agenda, plan the dates and times of attacks, and other
- 6 activities in violation of USA laws.
- 7 r. Recruiting of administrative personnel in the USA to assist the ADF in all
- 8 aspects of its goals.
- 9 s. Providing media relations service, coordination services, for the ADF in the
- 10 USA; and so on and forth, without limitation.

11 **Ivo Tapang's domination and control of ADF conduct**

12 68. As set forth herein, at all relevant times, Tapang used his position from
13 the USA to effectuate all the various services, conduct, and duties, without limitation,
14 listed in paragraph 71 above, and paragraphs 43 through 53.

15 69. Tapang is the spokesperson of the ADF and de facto leader of the ADF
16 in the United States.

17 70. Attached as **Exhibit C** is a selected excerpt from the venerable Human
18 Rights Watch, the report section discussing the violence and abuses of armed
19 separatist groups like the ADF in Cameroon.

20 71. Attached as **Exhibit D** is chart comprising two hundred (200) articles,
21 posts, references with regards to the crimes, terror, torture, kidnappings, and other
22 national and international law violations of the ADF.

23
24 **FIRST CAUSE OF ACTION**
25 **TO RECOVER PERSONAL INJURY AND WRONGFUL DEATH**
26 **DAMAGES PURSUANT TO THE ANTI-TERRORISM ACT**

27 72. Plaintiffs repeat and re-allege all of the preceding paragraphs as if fully
28 set forth herein.

1 73. This action is brought pursuant to 18 U.S.C. § 2333(a) for the injuries
2 and deaths suffered by U.S. nationals' parents and siblings in the May 20th Attacks as
3 well as other attacks causing plaintiffs harm and injuries.

4 74. Those attacks constituted acts of international terrorism pursuant to 18
5 U.S.C. §2331 that violated federal and state laws against murder, kidnapping, assault
6 and aircraft hijacking, including but not limited to 18 U.S.C. §2332b (prohibiting
7 terrorist acts of kidnapping, assault and murder).

8 75. Pursuant to 18 U.S.C. §2333(a), (d), Ivo Tapang aided and abetted
9 Ambazonia Defense Forces through numerous acts detailed herein by knowingly
10 providing it with substantial material assistance to prepare and carry out an act or acts
11 of international terrorism.

12 76. Pursuant to 18 U.S.C. §2333(a), (d), Ivo Tapang conspired with
13 Ambazonia Defense Forces and others to provide it with substantial material support
14 and resources, with the shared understanding, knowledge and intent that said support
15 and resources would be used by Ambazonia Defense Forces to prepare and carry out
16 an act or acts of international terrorism.

17 77. The others in the conspiracy currently known to plaintiffs are not named
18 herein, but include Ayaba Cho, Chris Anu, Boh Hebert, Akwanga Ebenezer, Mark
19 Baretta, Ikome Sako, Eric Tataw, and others.

20 78. Pursuant to §2333(a), Ivo Tapang committed an act or acts of
21 international terrorism, as defined in 18 U.S.C. § 2331(1)(A), in violation of federal
22 and state criminal laws, or that would have been a criminal violation if committed
23 within the United States or any state, including but not limited to a violation of the
24 following:

- 25
26 a. 18 U.S.C. §2(a) — Aiding, abetting, counseling, commanding, inducing
or procuring a federal crime;
27 b. 18 U.S.C. §371 — Conspiring to commit a federal crime;

- c. 18 U.S.C. §2332b — Conspiring to commit an act of terrorism;
- d. 18 U.S.C. §2339A - Providing material support to terrorists;
- e. 18 U.S.C. §2339C - Prohibitions against the financing of terrorism;
- f. CA Penal Code §31 — Accomplice liability – Aiding and Abetting Law;
- g. CA Penal Code §182 - Criminal Conspiracy
- h. CA Penal Code §32 – Accessory after the fact

79. Tapang's conduct amounted to a violation of 18 U.S.C. § 2(a) because Tapang intentionally aided, abetted and counseled the commission of a criminal act or acts of international terrorism by Ambazonia Defense Forces, including its operatives, by providing the terrorist organization with material support, resources and funding with the knowledge that Ambazonia Defense Forces would use such assistance to prepare for and commit such a criminal act or acts.

80. Tapang's conduct amounted to a violation of 18 U.S.C. §371 because it conspired with Ambazonia Defense Forces and others to provide it with substantial material support and resources with the shared understanding, knowledge and intent that said support and resources would be used by Ambazonia Defense Forces to prepare for and carry out a criminal act or acts of international terrorism.

81. Tapang's conduct amounted to a violation of 18 U.S.C. §2339A in that on and prior to May 20, 2018, and continuing today, he provides material support or resources for Ambazonia Defense Forces and/or conspired with Ambazonia Defense Forces and others to provide material support or resources for Ambazonia Defense Forces, with the knowledge or intent that they would be used in preparation for, or in carrying out a violation of the statutes specified in 18 U.S.C. §2339A, including 18 U.S.C. §2332b (prohibiting terrorist acts of kidnapping, assault and murder) and violation of others laws as itemized in paragraph 80.

82. Tapang's conduct amounted to a violation of 18 U.S.C. § 2339A in that it concealed or disguised the nature, location, source, or ownership of Ambazonia Defense Forces' material support or resources and/or conspired with ADF and Tapang's agents, Tapang's accomplices, Ambazonia Defense Forces, Ambazonia

1 Defense Forces operatives and sympathizers and others, known and unknown, to
2 conceal or disguise the nature, location, source or ownership of Ambazonia Defense
3 Forces' material support or resources, with the knowledge or intent that they would
4 be used in preparation for, or in carrying out a violation of the statutes specified in 18
5 U.S.C. §2339A, including 18 U.S.C. §2332b (prohibiting terrorist acts of kidnapping,
6 assault and murder) and violation of others laws as itemized in paragraph 80.

7 83. Tapang's conduct amounted to a violation of relevant state criminal laws
8 on facilitating, aiding and abetting a crime, and conspiracy, including but not limited
9 to those cited above, in that it:

- 10 a. intentionally aided, abetted and counseled Ambazonia Defense Forces by
11 providing it with material support, resources and funding with the
12 knowledge that Ambazonia Defense Forces would use such assistance to
13 commit an act or acts of international terrorism; and/or
- 14 b. believing it was probably rendering aid in the form of material support
15 or resources and funds to Ambazonia Defense Forces to engage in a
16 crime, provided Ambazonia Defense Forces with the means or
17 opportunity for the commission thereof and which in fact aided
18 Ambazonia Defense Forces to commit the May 20th Attacks; and/or all
19 other attacks and intimidation on innocent civilians from October 2016
20 to present.
- 21 c. conspired with ADF leaders, soldiers, and fighters, particularly the
22 Ambazonia Defense Forces, Ambazonia Defense Forces operatives and
23 sympathizers and others known and unknown, to violate relevant state
24 criminal laws on facilitating and aiding and abetting a crime and
25 committing an act or acts of terrorism, including assault, kidnapping and
26 murder.

27 84. As detailed herein, the aforesaid act or acts of international terrorism:

- 1 a. involve a violent act or acts dangerous to human life, as demonstrated by
2 the known and foreseeable outcomes of injury and death resulting from
3 providing substantial assistance to Ambazonia Defense Forces terrorists;
4 b. were committed primarily outside the territorial jurisdiction of the United
5 States and also transcended national boundaries in terms of the means by
6 which they were accomplished, the persons they appear intended to
7 intimidate or coerce, and the locales in which their perpetrators operated;
8 and
9 c. appeared to be intended to intimidate or coerce a civilian population; to
10 influence the policy of a government by intimidation or coercion; or, to
11 affect the conduct of a government by mass destruction, kidnapping or
12 assassination.

13 85. The aforesaid acts of Tapang were not mere negligence, but each act
14 individually and/or in combination with one or more acts, constituted conduct that was
15 intentional, reckless, willful and/or grossly negligent and each of those acts
16 individually and/or in combination with one or more of those acts was a proximate
17 cause of the May 20th Attacks, other relevant attacks, and the resulting injuries and
18 deaths of plaintiffs' parents and brother, as well as that of hundreds of other
19 Anglophone Cameroonians.

20 86. The May 20th Attacks, other attacks from October 2016 to present, could
21 not have occurred absent the knowing and substantial assistance provided to
22 Ambazonia Defense Forces by Tapang and those attacks and resulting injuries and
23 deaths were a natural, probable and reasonably foreseeable consequence of Tapang's
24 conduct.

25 87. As a result, the Tapang and all DOES defendants are liable to plaintiffs
26 for all damages resulting from the injuries and deaths in the May 20th Attacks, as well
27 as the deaths and sufferings of all those similarly situated as plaintiffs.

1 88. Plaintiffs, the surviving family members of each decedent, the decedents
2 and their Estates have suffered and will continue to suffer past and future damages as
3 a result of the injuries and deaths sustained in the May 20th Attacks and all attacks
4 from October 2016 to present, including but not limited to: personal injury damages,
5 wrongful death damages, survival damages, economic damages, pecuniary loss, non-
6 economic damages, pain and suffering, torture, imprisonment, kidnapping, fear of
7 impending death, physical trauma, mental anguish, mental distress, grief, loss of
8 enjoyment of life, loss of earnings, financial support, services, companionship, care,
9 guidance, consortium, burial costs, medical and other expenses and other provable
10 damages allowed by law.

11 89. WHEREFORE, plaintiffs pray that judgment(s) for relief in the form of
12 an award or awards of monetary damages for personal injury, wrongful death, all
13 recoverable losses under 28 U.S.C. §2333 and other appropriate relief be entered on
14 their first cause of action in favor of the plaintiffs individually and as estate
15 representatives and against the defendant Tapang Ivo, with separate awards for each
16 plaintiff, where appropriate, plus interest, costs, punitive damages, treble damages,
17 attorney's fees, and such other relief as the Court deems just and proper.

18
19 **SECOND CAUSE OF ACTION**
20 **FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES**
21 **PURSUANT TO STATE TORT LAW**

22 90. Plaintiffs repeat and re-allege all of the preceding paragraphs as if fully
23 set forth herein.

24 91. Prior to and including May 20, 2018, Ivo Tapang: participated and
25 associated with Ambazonia Defense Forces in its terrorist agenda as set forth herein;
26 provided Ambazonia Defense Forces and its fighters with substantial material support,
27 financing and resources; knew that it was assisting a terrorist organization that had

1 conducted and was actively planning attacks against the United States; and committed
2 tortious acts and omissions that were intentional, knowing, reckless, willful, wanton,
3 grossly negligent and/or negligent.

4 92. Tapang's conduct was a proximate cause of the deaths, injuries and
5 resulting damages suffered by plaintiffs, as it furnished the essential support networks,
6 cover and funding used by Ambazonia Defense Forces to successfully plan and
7 execute the May 20th Attacks, as well as attacks that has killed hundreds of innocent
8 civilians.

9 93. Tapang tortuously aided and abetted Ambazonia Defense Forces by
10 providing substantial assistance in the form of funding, support and resources to
11 Ambazonia Defense Forces and its fighters with the knowledge that they planned to
12 use such assistance to prepare for and conduct terrorist attacks against innocent
13 civilians in Kumbo, Bui Division, North-west region as well as in other parts of
14 Anglophone Cameroon, and acted with reckless disregard of the known probable risk
15 that such assistance would be used for those terrorist purposes.

16 94. Tapang tortuously conspired with Ambazonia Defense Forces and others
17 to provide Ambazonia Defense Forces and its fighters with substantial material
18 support and resources, with the shared agreement, understanding, knowledge and
19 intent that said support and resources would be used by Ambazonia Defense Forces
20 to plan and carry out terrorist acts against the United States.

21 95. Despite such knowledge, Ivo Tapang intentionally and/or recklessly
22 failed to properly supervise its ADF soldiers, fighters, officers, and agents and to stop
23 them from using Ivo Tapang's resources, but rather desired to provide substantial
24 assistance to Ambazonia Defense Forces, despite the known and/or foreseeable risk
25 that such assistance was being used by Ambazonia Defense Forces to prepare and
26 conduct a terrorist attack on May 20th, as well as other dates, resulting in plaintiffs
27 harm.

1 96. Moreover, Ivo Tapang intentionally and/or recklessly selected, hired and
2 retained as its ADF fighters, soldiers, officers, agents, and various individuals, and
3 others, who Ivo Tapang knew were Ambazonia Defense Forces operatives or
4 sympathizers, despite the known and/or foreseeable risk that these persons and agents
5 would use and/or were using their positions to provide substantial assistance to
6 Ambazonia Defense Forces to prepare and conduct the May 20th attacks, as well as
7 other attacks against innocent civilians in the Anglophone regions.

8 97. The aforesaid intentional, criminal, knowing, reckless, willful, wanton,
9 grossly negligent and/or negligent acts and/or omissions of Ivo Tapang were
10 individually and/or in combination with one or more of those acts and/or omissions a
11 proximate, a substantial cause of the May 20th Attacks, as well as other attacks, and
12 the plaintiffs' injuries, deaths and resulting damages.

13 98. WHEREFORE, plaintiffs pray that judgment(s) for relief in the form of
14 an award or awards of monetary damages for personal injury, wrongful death and
15 other appropriate relief be entered on their second cause of action in favor of the
16 plaintiffs individually and as estate representatives and against the defendant Tapang
17 Ivo, with separate awards for each plaintiff, where appropriate, plus interest, costs,
18 punitive damages, treble damages, attorney's fees, and such other relief as the Court
19 deems just and proper.

20
21 **THIRD CAUSE OF ACTION**
22 **FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES**
23 **PURSUANT TO THE ALIEN TORT CLAIMS ACT**

24 99. Plaintiffs repeat and re-allege all of the preceding paragraphs as if fully
25 set forth herein.

1 100. The Alien Tort Claims Act, 28 U.S.C. §1350, allows aliens to sue for
2 torts committed in violation of the law of nations, international law or a treaty of the
3 United States.

4 101. The conduct of Tapang as detailed herein to provide substantial material
5 support, resources and sponsorship for Ambazonia Defense Forces and its acts of
6 international terrorism resulting in the May 20th Attacks and all other attacks in
7 Cameroon from October 2016 to present constitutes a clear violation of the law of
8 nations and international law, which includes international legal norms prohibiting
9 crimes against humanity, mass murder, genocide, torture, extrajudicial killing, air
10 piracy, financing of terrorism, and terrorism, which can be found in and derived from,
11 among other things, the following conventions, agreements, U.N. declarations and
12 resolutions, and other documents:

- 13 a. Charter of the International Military Tribunal, Aug. 8, 1945, 59 Stat.
1544, 82 U.N.T.S. 279;
- 14 b. Allied Control Council Law No. 10 (Dec. 20, 1945);
- 15 c. Convention on the Prevention and Punishment of the Crime of Genocide,
16 Dec. 9 1948, 78 U.N.T.S. 277;
- 17 d. Geneva Convention (IV) Relative to the Protection of Civilian Persons
18 in Time of War, Aug. 12, 1949, 75 U.N.T.S. 287;
- 19 e. Hague Convention for the Suppression of Unlawful Seizure of Aircraft
20 (Hijacking), Dec. 16, 1970, 22 U.S.T. 1641, 860 U.N.T.S. 105;
- 21 f. International Convention for the Suppression of Terrorist Bombings,
22 Dec. 15, 1997, 2149 U.N.T.S. 284 (entered into force May 23, 2001);
- 23 g. International Convention for the Suppression of the Financing of
24 Terrorism, Dec. 9, 1999, 2178 U.N.T.S. 229 (entered into force Apr. 10,
25 2002);
- 26 h. U.N. Security Council Resolution 1267, U.N. Doc. S/RES/1267 (Oct. 15,
27 1999);
- 28 i. U.N. Security Council Resolution 1373, U.N. Doc. S/RES/1373 (Sept.
28, 2001);
- j. Protocol Additional (I) to the Geneva Conventions of 12 August 1949,
and Relating to the Protection of Victims of International Armed
Conflict, June 8, 1977, 1125 U.N.T.S. 3;

- 1 k. Protocol Additional (II) to the Geneva Conventions of 12 August 1949,
2 and Relating to the Protection of Victims of Non-International Armed
3 Conflicts, June 8, 1977, 1125 U.N.T.S. 609;
- 4 l. Statute of the International Criminal Tribunal for the Former Yugoslavia
5 (ICTY), in Report of the Secretary-General pursuant to paragraph 2 of
6 S.C. Res.808, May 3, 1993, U.N. Doc. 8/25704, adopted unanimously by
7 S.C. Res. 827, U.N. SCOR, 48th Sess., 3217th mtg., 16, U.N. Doc.
8 S/PV.3217 (1993);
- 9 m. The Convention on the Prevention and Punishment of Crimes Against
10 International Protected Persons, Including Diplomatic Agents, 28 U.S.T.
11 1975, T.I.A.S. No. 8532 (1977), implemented in 18 U.S.C. § 1121;
- 12 n. The General Assembly Resolutions on Measures to Prevent International
13 Terrorism, G.A. Res. 40/61 (1985) and G.A. Res. 42/159 (1987); and
- 14 o. The Convention on the High Seas, April 29, 1958, arts. 14-22 (piracy),
15 13 U.S.T. 2312, 450 U.N.T.S. 11.

16 102. Tapang's conduct was a substantial cause of the May 20th Attacks and
17 all other attacks from October 2016 to present against innocent civilians in the North
18 West and South West regions, and the plaintiffs' injuries, deaths and resulting
19 damages.

20 **FOURTH CAUSE OF ACTION**
21 **FOR RICO (18 U.S.C. § 1962(C))**

22 103. Plaintiff re-alleges and incorporates by reference all prior paragraphs of
23 this Complaint and paragraphs in the counts below as though set forth fully herein.

24 104. Tapang and all Does Defendants 1 – 5000 (collectively “Defendants”)
25 are all “persons” within the meaning of 18 U.S.C. § 1961(3). At all relevant times,
26 Defendants conducted the affairs of an Enterprise—which affected interstate and
27 foreign commerce—through a pattern of racketeering activity, in violation of 18
28 U.S.C. § 1962(c).

A. ADF is the Racketeering Enterprise

105. ADF is a Racketeering Enterprise, as that term is used in 18 U.S.C. §
1961(4). The Enterprise was formed by January of 2017.

1 106. ADF had an ongoing organizational framework for carrying out its
2 objectives.

3 107. As described above, Tapang and each DOES Defendant participated in
4 the operation or management of the Enterprise.

5 108. Because ADF raises hundreds of thousands of dollars to support their
6 terrorist operations in Cameroon, by contacting sympathetic USA based Anglophone
7 Cameroon natives, it affects interstate and foreign commerce.

8 109. Tapang and each DOES Defendant conducted and/or participated in the
9 affairs of the Enterprise through a pattern of racketeering activity, including acts
10 indictable under 18 U.S.C. §2(a) — Aiding, abetting, counseling, commanding,
11 inducing or procuring a federal crime; 18 U.S.C. §371 — Conspiring to commit a
12 federal crime; 18 U.S.C. §2332b — Conspiring to commit an act of terrorism; 18
13 U.S.C. §2339A - Providing material support to terrorists; 18 U.S.C. §2339C -
14 Prohibitions against the financing of terrorism; without limitation.

15
16 **B. Alternatively, and at the Very Least, ADF Was Part of an
17 Association-In-Fact Enterprise**

18 110. Alternatively, and at the very least, ADF was part of an Association-In-
19 Fact Enterprise comprising Tapang and DOES defendants, ADF, and similar
20 organizations. . The Association-In-Fact Enterprise was formed by at least January
21 2017. From that time until present, the members of the Association-In-Fact Enterprise
22 worked together to further their mutual goals of separation from the Republic of
23 Cameroon to form an Ambazonia state, using guerilla tactics, terrorism, providing
24 material support to ADF fighters and related organizations, violence and intimidation
25 of Anglophone Cameroonians who do not support their political aims, kidnappings,
26 and other evil atrocities.

1 111. The Association-In-Fact Enterprise has an ongoing organizational
2 framework for carrying out its objectives. In fact, the Association-In-Fact Enterprise
3 could not have carried out its intricate task of sharing confidential information at the
4 moments when it would be most beneficial to ADF unless it had some structure for
5 making and communicating group decisions. The Association-In-Fact knows how to
6 reach its ADF fighters, agents, camps to provide instructions on what carnage to
7 execute on designated dates and times, including the May 20th attacks.

8 112. As described above, each Defendant participated in the operation or
9 management of the Association-In-Fact Enterprise, and benefitted financially from the
10 enterprise.

11 113. Because the Association-In-Fact Enterprise's activities including the
12 raising of funds from Cameroon native sympathizers across the 50 states of the USA,
13 using interstate transportation and communications, traveling interstate to give
14 speeches, incite support, obtain goods and services for the ADF based operatives in
15 Cameroon, it affected interstate and foreign commerce.

16 **C. RICO Predicate Acts**

17 114. Each Defendant conducted and/or participated in the affairs of ADF and
18 the Association-In-Fact Enterprise through a pattern of racketeering activity,
19 including acts indictable under 18 U.S.C. §2(a) — Aiding, abetting, counseling,
20 commanding, inducing or procuring a federal crime; 18 U.S.C. §371 — Conspiring to
21 commit a federal crime; 18 U.S.C. §2332b — Conspiring to commit an act of
22 terrorism; 18 U.S.C. §2339A - Providing material support to terrorists; 18 U.S.C.
23 §2339C - Prohibitions against the financing of terrorism; without limitation.

24 115. Additional facts, conduct, actions, of Tapang and DOES defendants,
25 including ADF, acting jointly, and in concert with each other, are as noted in the
26 Exhibit A and Exhibit B documents listed with links to the videos, as well as videos
27 listed, with hyperlinks to the videos.

1 **C. RICO Damages**

2 116. Plaintiff has been injured by Defendants’ violation of 18 U.S.C. §
3 1962(c). Defendants caused enormous harm to Plaintiff, as described above. All of
4 these injuries occurred within the United States.

5
6 **FIFTH CAUSE OF ACTION**

7 **FOR RICO CONSPIRACY (18 U.S.C. § 1962(D))**

8 117. Plaintiff re-alleges and incorporates by reference all prior paragraphs of
9 this Complaint and paragraphs in the counts below as though set forth fully herein.

10 118. Defendants conspired with each other to violate 18 U.S.C. § 1962(c).
11 Defendants knowingly agreed, combined, and conspired to conduct the affairs of the
12 Enterprise or the Association-In-Fact Enterprise through ADF operations, Interim
13 Government (“IG”) operations, Southern Cameroons Defense Forces (SOCADEF)
14 operations, and the like. Each Defendant agreed that the operation would involve
15 repeated violations of 18 U.S.C. §2(a) — Aiding, abetting, counseling, commanding,
16 inducing or procuring a federal crime; 18 U.S.C. §371 — Conspiring to commit a
17 federal crime; 18 U.S.C. §2332b — Conspiring to commit an act of terrorism; 18
18 U.S.C. §2339A - Providing material support to terrorists; 18 U.S.C. §2339C -
19 Prohibitions against the financing of terrorism; without limitation Defendants’
20 conspiracy to violate 18 U.S.C. § 1962(c) violated § 1962(d).

21 119. Plaintiffs have been injured by Defendants’ violation of 18 U.S.C. §
22 1962(d). Plaintiffs have been injured by Defendants’ violation of 18 U.S.C. § 1962(c).
23 Defendants caused enormous harm to Plaintiff’s. All of these injuries occurred within
24 the United States.

25 **SIXTH CAUSE OF ACTION**

26 **LIABILITY FOR AIDING AND ABETTING ACTS OF**
27 **INTERNATIONAL TERRORISM PURSUANT TO 18 U.S.C. § 2333(a)**

1 or authorizing acts of international terrorism, including the acts of international
2 terrorism that injured Plaintiffs.

3 127. By aiding and abetting ADF and related armed groups and militia in
4 Cameroon in committing, planning, or authorizing acts of international terrorism,
5 including acts that caused each of the Plaintiffs to be injured in his or her person and
6 property, Defendants are liable pursuant to 18 U.S.C. § 2333(a) and (d) for threefold
7 any and all damages that Plaintiffs have sustained as a result of such injuries, and the
8 costs of this suit, including attorney's fees.

9
10 **SEVENTH CAUSE OF ACTION**
11 **LIABILITY FOR CONSPIRING IN FURTHERANCE OF ACTS OF**
12 **INTERNATIONAL TERRORISM PURSUANT TO 18 U.S.C. § 2333(a)**

13 128. Plaintiffs repeat and re-allege each and every allegation of the foregoing
14 paragraphs as if fully set forth herein.

15 129. Defendant Tapang knowingly agreed, licensed, and permitted ADF and
16 its affiliates to register and use Defendants' platform, Facebook posts, WhatsApp
17 account, twitter, phone communications, financial support, fundraising, conduct,
18 actions, participations, and other services to promote and carry out ADF's activities,
19 including ADF's illegal acts of international terrorism that injured Plaintiffs.

20 130. Defendant Tapang were aware that U.S. federal law prohibited providing
21 material support and resources to, or engaging in transactions with, terrorist
22 organizations and/or engaging in acts constituting international terrorism.

23 131. Defendant Tapang thus conspired with ADF in its illegal provision of
24 Defendants' platform, Facebook posts, WhatsApp account, twitter, phone
25 communications, and conduct, financial support, fundraising, actions, participations
26 other services to promote and carry out ADF's illegal acts of international terrorism,
27 including the acts that injured Plaintiffs.

1 137. Tapang provided these services, equipment, and personnel to ADF and
2 related armed separatist groups, knowing that they were to be used in preparation for,
3 or in carrying out, criminal acts including the acts that injured the Plaintiffs.

4 138. As set forth more fully above, but for the material support and resources
5 provided by Defendants, the attack that injured the Plaintiffs would not have occurred.

6 139. By committing violations of 18 U.S.C. § 2339A that have caused the
7 Plaintiffs to be injured in his or her person, business or property, Defendants are liable
8 pursuant to 18 U.S.C. § 2333 for any and all damages that Plaintiffs have sustained as
9 a result of such injuries.

10
11 **NINTH CAUSE OF ACTION**
12 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

13 140. Plaintiffs repeat and re-allege each of the foregoing allegations with the
14 same force and effect as if more fully set forth herein.

15 141. Tapang engaged in negligent behavior by providing services, material
16 support, training, expert advice or assistance, personnel, social media platform, other
17 media communications, to ADF and related armed separatist groups.

18 142. Tapang's acts of providing the aforementioned actions to ADF and other
19 armed separatist groups constituted a willful violation of federal statutes, and thus
20 amounted to a willful violation of a statutory standard.

21 143. As a direct, foreseeable and proximate result of the conduct of Tapang as
22 alleged herein above, Plaintiffs has suffered severe emotional distress, and therefore
23 Tapang is liable to the Plaintiffs for Plaintiffs' severe emotional distress and related
24 damages.

25
26 **PRAYER FOR RELIEF**

1 WHEREFORE, Plaintiff demands judgment against Defendants on all Counts,
2 and seeks such relief as specified below for all Counts for which such relief is provided
3 by law:

- 4 a) Awarding Plaintiff damages in an amount to be determined at trial;
- 5 b) Awarding Plaintiff compensatory and treble damages, as available, in an
6 amount to be proven at trial;
- 7 c) Awarding Plaintiff the financial gain earned by Defendants as a consequence
8 of the violations described herein;
- 9 d) Awarding Plaintiff statutory damages, as available;
- 10 e) Awarding Plaintiff punitive damages, as available;
- 11 f) Issuing a **Declaration** that: defendant Tapang’s conduct, and that of DOES
12 defendants, and like sympathizers, who assist with providing material support
13 to ADF and similar organization attacks on innocent civilians is a violation of
14 USA ant-terrorism act laws.
- 15 g) Issuing an **Injunction, including a preliminary injunction**: restraining
16 Tapang and his agents, fighters, organization, and those acting in active
17 concert or participation with him from: engaging in conduct as alleged in this
18 Complaint, and principally the material support of terrorism in Cameroon, and
19 including, but not limited to an injunction against engaging in these crimes: 18
20 U.S.C. §2(a) — Aiding, abetting, counseling, commanding, inducing or
21 procuring a federal crime; 18 U.S.C. §371 — Conspiring to commit a federal
22 crime; 18 U.S.C. §2332b — Conspiring to commit an act of terrorism; 18
23 U.S.C. §2339A - Providing material support to terrorists; 18 U.S.C. §2339C -
24 Prohibitions against the financing of terrorism; kidnapping, assault, battery,
25 murder, destruction of property, civilian intimidation and threats, without
26 limitation.

- 1 h) Awarding Plaintiff all costs and attorneys' fees to the full extent permitted
2 under the applicable law;
- 3 i) Awarding Plaintiff pre- and post-judgment interest as permitted by law;
- 4 j) Awarding any other relief as the Court may deem just and proper.
- 5 k) That the Court, *sua sponte*, with its inherent Constitutional and Statutory
6 powers to ensure justice, and to help save lives and pain and sufferings of
7 similar plaintiffs within its jurisdiction:
- 8 a. Refer this matter to the terrorism units of the FBI with jurisdiction over
9 this defendant Tapang who lives and works within the San Jose
10 community, with most persons oblivious to his true person, as his
11 conduct and actions present a clear and present danger of imminent
12 terrorism that harms US citizens, for investigations and assessment
13 consistent with the allegations herein;
- 14 b. Refer this matter to the terrorism units of the California State and local
15 police with jurisdiction over the defendant Tapang, as his conduct and
16 actions present a clear and present danger of terrorism imminent that
17 harms US citizens, for investigations and assessment consistent with the
18 allegations herein;
- 19 c. Refer this defendant Tapang, an immigrant, to the United States
20 Department of Homeland Security ("DHS"), Immigration and Customs
21 Enforcement, and other related DHS agencies, for immediate
22 investigation and assessment to determine whether his conduct and
23 actions present a clear and present danger of imminent terrorism that
24 harms US citizens, for investigations consistent with the allegations
25 herein;
- 26 d. All other actions which this Court deems appropriate to prevent terrorist
27 acts emanating from Tapang harming US citizens and residents.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 26, 2018, I directed that the foregoing document be electronically filed with the Clerk of the Court by using the CM/ECF system, and

[X] (By U.S. Mail) I deposited such envelope in the mail at Los Angeles, CA on December 26, 2018 with postage thereon fully prepaid. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Defendant
IVO TANKU TAPANG
5055 DENT AVE APT 97
SAN JOSE, CA 95118-2288

By: _____/S/_____
EMMANUEL NS AHLAI

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