

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria)

John Doe  
c/o Allred, Bacon, Halfhill & Young, PC  
11350 Random Hills Road, Suite 700  
Fairfax VA 22030

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\*  
\* Case No.

Plaintiff,

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v.

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UNITED STATES DEPARTMENT OF  
STATE  
c/o Rewards for Justice  
Washington D.C. 20522  
20522-0303 USA

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SERVE:  
The Executive Office  
Office of the Legal Advisor  
Suite 5.600  
600 19<sup>th</sup> Street, NW  
Washington D.C. 20522

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Defendant.

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**COMPLAINT AND JURY DEMAND**

NOW COMES John Doe, by counsel, and hereby files his Complaint against the United States Department of State c/o Rewards for Justice Program, and in support, states:

**NATURE OF THE CASE**

1. This lawsuit seeks the Court's intervention to enforce a reward due to the Plaintiff for the Defendant's unlawful breach of its duties pursuant to a reward offered as part of the Rewards for Justice Program for Information regarding the Hizballah Financial Networks. Plaintiff complied with all requests and demands made as part of the above-referenced reward offer. Plaintiff

supplied pertinent information that ultimately led to the disruption of the financial mechanisms of the terrorist organization, Lebanese Hizballah. Defendant failed to issue a determination or issue a reward to the Plaintiff, in violation of the Rewards for Justice Program, and in violation of Rewards for Justice Program for Information regarding the Hizballah Financial Networks. A copy of the Reward Poster is attached hereto as Exhibit A. Defendant violated its contract and agreement with the Plaintiff, when it failed to provide a determination or reward to the Plaintiff, in exchange for the information Plaintiff provided.

2. Plaintiff therefore appeals to this Court to enforce the contract and reward promised to the Plaintiff, and award Plaintiff the sum of Ten Million Dollars (\$10,000,000.00) from the Defendant in accordance with the Rewards for Justice Program.

#### **PARTIES AND JURISDICTION**

3. Plaintiff, John Doe, is an individual residing in the United States, but was at all relevant times herein a citizen of Lebanon.

4. Defendant, the United States Department of State, c/o Rewards for Justice is a federal administrative agency located at Washington D.C. 20522, 20522-0303 USA. The Rewards for Justice Program was established by the 1984 Act to Combat International Terrorism, Public Law 98-533 (codified 22 U.S.C. Section 2708). The goal of the Rewards for Justice Program is to bring international terrorists to justice and prevent acts of international terrorism against U.S. persons or property. Under the Rewards for Justice Program, the Secretary of State may authorize rewards for information that leads to the arrest or conviction of anyone who plans, commits, aids, or attempts international terrorist acts against U.S. persons or property, that prevents such acts from occurring in the first place, that leads to the identification or location of a key terrorist leader, or that disrupts terrorism financing.

5. This action arises under the Department of State Rewards for Justice Program, 22 U.S.C. Section 2708. This Court has subject matter over this action pursuant to 28 U.S.C. because this action arises under the laws of the United States and involves a Federal Question.

6. Venue is proper in the Eastern District of Virginia, Alexandria, pursuant to 28 U.S.C. Sections 1391(b) and (e), as a substantial part of the events and omissions giving rise to the claims asserted in this Complaint occurred in Northern Virginia, and in this Court's jurisdiction.

### **FACTUAL ALLEGATIONS**

7. The Defendant, through its Rewards for Justice Program published a reward offer for information pertaining to Lebanese Hizballah's Financial Network ("Hizballah Reward"). See Exhibit A. The Hizballah Reward offered a reward of up to Ten Million Dollars (\$10,000,000.00) for information leading to the disruption of the financial mechanisms of Lebanese Hizballah. *Id.*

8. Defendant promised, through the Hizballah Reward, a reward, for up to Ten Million Dollars (\$10,000,000.00), for information leading to the identification and disruption of any of the following: (a) a significant source of revenue for the organization or its key financial facilitation mechanisms; (b) major Hizballah donors and financial facilitators; (c) financial institution and exchange houses knowingly facilitating significant Hizballah transactions; (d) businesses and investments owned or controlled by Hizballah; (e) front companies engaged in international procurement of dual-use technology; and (f) criminal schemes involving Hizballah members and supporters, who are financially benefitting the organization.

9. Plaintiff, thereafter, engaged in confidential discussions with the Defendant, to provide information sought in the Hizballah Reward. Plaintiff provided specific information regarding the following: (a) significant sources of revenue for the organization or its key financial

facilitation mechanisms; (b) major Hizballah donors and financial facilitators; (c) financial institution and exchange houses knowingly facilitating significant Hizballah transactions; (d) businesses and investments owned or controlled by Hizballah; (e) front companies engaged in international procurement of dual-use technology; and (f) criminal schemes involving Hizballah members and supporters, who are financially benefitting the organization.

10. Specifically, Plaintiff provided information that ultimately lead to the disruption of the financial mechanism of Lebanese Hizballah as demanded by the Hizballah Reward. Defendant's representatives never denied Plaintiff's compliance with the Hizballah Reward or the bona fides of Plaintiff's information.

11. Upon turning over the above referenced information and complying with the specific demands of the Defendant, Plaintiff requested the compensation that he was entitled to and as promised by the Defendant through the Hizballah Reward. Defendant failed to make a determination as required under 22 U.S.C. Section 2708 and failed to provide Plaintiff with a reward as offered and promised. Plaintiff, thereafter, made a demand through his counsel for payment. Despite demand, Defendant failed to respond and has breached its contractual obligations and its obligations pursuant to 22 U.S.C. Section 2708. Plaintiff, therefore, respectfully requests that this Court enforce the contract and reward promised to the Plaintiff, and award Plaintiff the sum of Ten Million Dollars (\$10,000,000.00) from the Defendant in accordance with the Rewards for Justice Program and the Hizballah Reward.

## **CLAIMS**

### **COUNT I**

DEFENDANT'S VIOLATION OF 22 U.S.C. SECTION 2708 AND BREACH OF REWARD

12. Defendant made an offer and promise to the public and to any individual through its Hizballah Reward. Specifically, Defendant promised a reward of up to Ten Million Dollars (\$10,000,000.00), for information leading to the identification and disruption of any of the following: (a) a significant source of revenue for the organization or its key financial facilitation mechanisms; (b) major Hizballah donors and financial facilitators; (c) financial institution and exchange houses knowingly facilitating significant Hizballah transactions; (d) businesses and investments owned or controlled by Hizballah; (e) front companies engaged in international procurement of dual-use technology; and (f) criminal schemes involving Hizballah members and supporters, who are financially benefitting the organization. As a result, Defendant made a legal and binding offer to any individual who provided information that led to the disruption of the financial mechanisms of Lebanese Hizballah.

13. Plaintiff responded to the Hizballah Reward and provided significant information to the Defendant. The information provided by Plaintiff ultimately led to the disruption of the financial mechanisms of Lebanese Hizballah as required by the Defendant's offer.

14. Upon turning over the above referenced information and complying with the specific demands of the Defendant, Plaintiff requested the compensation that he was entitled to and as promised by the Defendant through the Hizballah Reward. Defendant failed to make a determination as required under 22 U.S.C. Section 2708 and failed to provide Plaintiff with a reward as offered and promised.

15. Plaintiff, thereafter, made a demand through his counsel for payment. Despite demand,

Defendant failed to respond and has breached its contractual obligations and its obligations pursuant to 22 U.S.C. Section 2708. Defendant violated its obligations pursuant to 22 U.S.C. Section 2708 and breached its obligations under the Hizballah Reward.

16. Plaintiff respectfully requests that this Court enforce the reward promised to the Plaintiff, and award Plaintiff the sum of Ten Million Dollars (\$10,000,000.00) from the Defendant in accordance with the Rewards for Justice Program and the Hizballah Reward.

17. Plaintiff demands a trial by jury.

**RELIEF REQUESTED**

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award Plaintiff a judgment in the sum of Ten Million Dollars (\$10,000,000.00) in favor of the Plaintiff and against the Defendant, the Department of State c/o Rewards for Justice Program; and
- B. That said judgment include pre-judgment and post-judgment interest, costs and reasonable attorneys' fees; and
- C. Award the Plaintiff any other further relief as the Court may deem just and proper.

Dated: March 9, 2020

Respectfully Submitted,

/s/James T. Bacon, Esq. \_\_\_\_\_  
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D.C. Bar No. 416209

*Attorney for Plaintiff*

tabbles' **PLAINTIFF'S EXHIBIT**  
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# REWARD

## UP TO \$10 MILLION



Mohammad Bazzi



Adham Tabaja



Ali Charara

The U.S. Department of State is offering a reward of up to \$10 million for information leading to the disruption of the financial mechanisms of Lebanese Hizballah. Absolute confidentiality is assured and relocation may be available. If you have information, please contact the nearest U.S. embassy or consulate or email [LH@rewardsforjustice.net](mailto:LH@rewardsforjustice.net).



### REWARDS FOR JUSTICE

Washington, D.C. 20533-0303 USA | 1-800-USREWARDS  
[LH@rewardsforjustice.net](mailto:LH@rewardsforjustice.net) | [www.rewardsforjustice.net](http://www.rewardsforjustice.net) | [@Rewards4Justice](https://twitter.com/Rewards4Justice)

