

FILED 20 DEC '21 10:45 USDC ORF

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JOHN MAURITZ HUMMASTI,

PLAINTIFF,

CIVIL COMPLAINT

VS.

No. 3:21-CV-1852-MO

REPUBLIC OF PAKISTAN,

DEFENDANT,

CAIR's San Francisco chapter director ZAHRA BILOO,

DEFENDANT,

TWITTER,

DEFENDANT.

COMES NOW, John Mauritz Hummasti, Plaintiff, and hereby complains as follows:

BACKGROUND

This is a Civil Action for Injunctive and Declaratory Relief against Defendants and for a redress of Plaintiff's First Amendment Free Speech claims against Defendant Twitter who, (together with Defendant Zahra Biloo) rather than (self-) censor "anti-Semitic hate speech" from their internet platform, promotes and permits "anti-Semitic hate speech" to be posted and remain on their internet platform by Defendant CAIR's San Francisco chapter director *Zahra Biloo* postings on twitter and those acting in concert and participation with them; and against Defendants who allege that Plaintiff has violated Pakistan's Criminal Code §295C by posting an on-line "tweet" related to Twitter's unlawful

and unconstitutional censure of 'On-Line' posting "Star of David" content and Defendant Twitter's suspension and locking of Plaintiff's Twitter account in violation of the First Amendment.

Relevant thereto, Defendant CAIR's San Francisco chapter director Zahra Billoo and Defendant Twitter continues to promote "anti-Semitic hate speech" in violation of the Israeli Law "Combatting Terrorism Law, 5776-2016" (Combatting Terrorism Law, 5776-2016, SEFER HAHUKIM [BOOK OF LAWS, the official gazette] 5776 No. 2556, p. 898; and Defendant Billoo is acting as an unregistered agent for a foreign terrorist organization (the IKWAN) by providing "material support and assistance to foreign terrorist organizations" (Hamas or the Muslim Brotherhood) in violation of the prohibitions regarding terrorism – e.g. 18 USC 2339A, et. seq.!

In relationship thereto, as ADL CEO Jonathan Greenblatt has stated: Defendant Billoo's "Islamophobia" allegations didn't discourage "Muslims from working with Jewish groups at-large," CAIR's statement claimed. She just lumped the ADL, Jewish Federation, campus Hillels and "Zionist synagogues" into an enemies list, connecting them all to a vast Jewish conspiracy to harm Muslims."

Such conspiratorial "*Jihadist*" allegations of a " a vast Jewish conspiracy to harm Muslims" under the guise of "Islamophobia" is an insidious attempt to incite violence against the International Jewish Community and "exclude Jews out of social justice and civil rights spaces such as the Internet."

In relationship to Defendant Twitter's unlawful suppression of and censure of 'On-Line' posting "Star of David" content, Plaintiff, an Orthodox Jew, on or about 21 July 2020 made the following posting <<https://twitter.com/JohnHummasti/status/1285990439263145986> >:

"@RabbiWolpe Why don't they ban Louis Farrakahn and the followers of that false prophet Muhammad the pedophile?"

Clearly, the content of Plaintiff's posting, while it may be offensive to the sensibilities of some Muslims, is protected religious speech under the First Amendment to the United States Constitution as it merely expresses the commonly held Jewish belief that Muhammad was a false prophet and Islam is

not a valid religion but rather “heresy” - a pagan [Quraish] tribal religion which promotes pedophilia and slanders Jews and attempts to rewrite Jewish history.

That is, a “false prophet” as Deuteronomy states (xiii. 2-6 [A. V. 1-5], xviii. 20-22), is designated there as “prophet, or a dreamer of dreams,” [...] And in the same Scriptural dicta the Talmud discovers provisions against the following classes of false prophets: (a) one who presumes to speak in G-D's name what He has not commanded (xviii. 20); (b) one who pretends to have been charged with a message which, in reality, G-D has entrusted to another (as an example of this class Hananiah, the son of Azur the prophet); (c) **one who speaks in the name of other gods** (Deut. xiii, 3 [A. V. 2], xviii. 20), whether ordering the observance of strictly Mosaic precepts on pretense of a revelation to that effect from *a strange deity*, or declaring that G-D ordains the worship of a strange deity, or that a strange deity ordains its own worship of itself (Sanh. xi. [x.] 5, 6; 89a).

Since Muhammad spoke in the name of the Quraish tribal pagan “moon” deity *both* “before and after” his alleged revelations, he spoke in the name of a false, foreign deity and as such is classified as a false prophet! Moreover, since Muslims and Islamic sources (*Hadith of Bukhari*, volume 5, #234) do not dispute that Muhammad was a pedophile as that term is understood and defined; Plaintiff's posting in relationship thereto was a factual or accurate historical statement of the truth!

In response to Plaintiff's posting, Defendant Republic of Pakistan Law Enforcement claimed to Defendant Twitter that Plaintiff violated Pakistan's Criminal Code; so, on or about 5 January 2021 Defendant Twitter sent Plaintiff an email which stated in part:

Twitter Legal <twitter-legal@twitter.com>Tue, Jan 5 at 7:50 PM

“Hello @JohnHummasi,

In the interest of transparency, we are writing to inform you that Twitter has received a request from Pakistan regarding your Twitter account, @JohnHummasi, that claims the following content violates the law(s) of Pakistan.

@JohnHummasi <https://twitter.com/JohnHummasi/status/1285990439263145986>

We have not taken any action on the reported content at this time as a result of this request. [...]

Sincerely,

Twitter”

Because Pakistan claims the content of Plaintiff's posting violates Pakistan's Criminal Code §295C¹ and such alleged violation carries with it the Death Penalty, Plaintiff requests that this Honorable Court enjoin the Pakistan (or, for example, the Jordanian) government(s) from taking legal action (E.g. Extradition or placing an Interpol “Red Notice”) against Plaintiff or other action which would violate Plaintiff's First Amendment right to Free Speech and Association or which would impose a legal barrier to Plaintiff's Treaty rights (e.g. to emigrate to Eretz Yisrael) which is recognized by the **Anglo-American Treaty of 1924** as the Supreme Law of the Land and guaranteed under Israeli Law to “Return to Eretz Yisrael” (Safe Passage or Safe Conduct²).

Additionally, because Plaintiff has been denied a “Constitutionally Protected” right to Freedom of Speech (on the world-wide-web or “the internet” - a public forum) by Defendant's' allegations, actions³ and omissions; Plaintiff sent Defendant Twitter the following email:

“RE: Notice of Legal Action – Pakistan Penal Code § 295C

Yahoo/Sent

John Hummasti <johnhummasti@yahoo.com>

To: twitter-legal@twitter.com

Sun, Feb 14 at 12:34 PM

B”H

To Whom It May Concern:

Shalom. This is notice that I will be pursuing legal action in the US District Court in regards to your email of 5 January 2021 wherein you assert that Pakistan claims the content of my twitter posting (in relationship to twitter censoring “Star of David” content) @ <https://twitter.com/JohnHummasti/status/1285990439263145986> violates Pakistan Law. My research indicates that the law of Pakistan I am alleged to have violated is § 295C, which carries the death penalty.

¹ or the *Hashemite Kingdom of Jordan's criminal code, Section 273* as amended - the 2006 amendment to the Criminal Procedures Act, relates that the state has the power to prosecute any crime - including blasphemy - committed in a foreign country if it affects Jordanians through the Internet or other “electronic means” - including Twitter.

² As the Court has stated, the “**law of the flag**” provides that, neutral persons and vessels may transverse international borders with *safe conduct*, unhindered or unmolested by mercenaries, terrorists, pirates, and the like. United States v. Jho, 534 F. 3d 398 (5th Circuit 2008), 18 U.S. Code § 1545. Haig v. Agee, 453 U.S. 280, 292 (1981), Appam, 243 U.S. 124 (1917).

³ Since Defendant Twitter has both locked and suspended Plaintiff's account, Defendants violate Plaintiff's First Amendment right to freely communicate with the Jewish Community and US and Israeli Elected Officials in a public forum and has specifically prevented Plaintiff from communicating with Rabbi Wolpe.

Use of derogatory remarks, spoken, written, directly or indirectly, etc. defiles the name of Muhammad or other Prophet(s) 1986

Mandatory Death and fine (Feb. 1990^[31]) Trial must take place in a Court of Session with a Muslim judge presiding.^[32]

Because this alleged offense carries with it the death penalty and the United States has an extradition treaty with Pakistan; whether you respond or not, I will be pursuing legal action to protect my right to free speech under the First Amendment.

In the interests of justice, please provide me with the name or agency in or of Pakistan who lodged a complaint with twitter in regards to the above mentioned posting. I do not wish to file a complaint against twitter to compel disclosure of the identity of the person or agency in Pakistan whom I've allegedly offended. This request is a simple one....

Thank you for your time and attention to this matter.

Yochanan Ezra ben Avraham

(John Mauritz Hummasti)

503-327-4268"

and took the additional legal precaution of posting said Legal Notice on the Internet at:

<https://johnmhumasti333455225.wordpress.com/2021/02/14/re-notice-of-legal-action-pakistan-penal-code-%c2%a7-295c/>

JURISDICTION

This Court has jurisdiction pursuant to 18 USC 2339A, et seq., 28 USC § 1331 (Federal Question), and 28 USC §1332 (Diversity of Citizenship).

PARTIES

Plaintiff resides at 2704 SE 136th Ave., Portland, Oregon 97236.

Defendant **Republic of Pakistan** is a purported sovereign entity whose Embassy for the purposes of this action is located at 3517 International Court NW, Washington, DC 20008.

Defendant **Twitter** is a corporate party whose legal address for purposes of this action is:

Twitter Headquarters 1355 Market St. Ste. 900 San Francisco, CA 94103.

Defendant CAIR's San Francisco chapter director **Zahra Billoo** is located at 3160 De La Cruz Blvd., Suite 110, Santa Clara, CA 95054.

CLAIM

Plaintiff avers that the actions and email(s) of Twitter Legal Department has a chilling effect on free speech. That is, because Defendants have asserted that Plaintiff's posting violates Pakistan's criminal code, yet refuses to disclose the identity of the person(s) (or agency) in Pakistan who claims

Plaintiff's speech violates said code; Plaintiff is unable to pursue legal action against any Pakistani or other person of the Islamic Umma from inciting "Islamic" violence against Plaintiff, an Orthodox Jew; and thus, his right⁴ to freely speak about false prophets is restrained or chilled by threat of censorship or suspension⁵ of Plaintiff's "Twitter Account" or an implied threat of Extradition, or Arrest by an Interpol "Red Notice" or threat incitement or threat of Death by Muslim terrorists.

4 See for example 1 King's 18.27 "And it came to pass at noon, that Elijah mocked them, and said: 'Cry aloud; for he is a god; either he is musing, or he is gone aside, or he is in a journey, or peradventure he sleepeth, and must be awaked.' " Here, Plaintiff's speech is protected because it is rooted in a firmly held religious belief that "false prophets are to be mocked and executed." (Devarim - Deuteronomy 13.6 "And that prophet, or that dreamer of dreams, shall be put to death; because he hath spoken perversion against the L-RD your G-D, who brought you out of the land of Egypt, and redeemed thee out of the house of bondage, to draw thee aside out of the way which the L-RD thy G-D commanded thee to walk in. So shalt thou put away the evil from the midst of thee.")

5 On Wednesday, February 24, 2021 at 8:45 PM Defendant Twitter "locked" Plaintiff's Twitter account for **"Violating our rules against hateful conduct.**

You may not promote violence against, threaten, or harass other people on the basis of race, ethnicity, national origin, sexual orientation, gender, gender identity, religious affiliation, age, disability, or serious disease."

Again, on or about Tue, Jun 8 at 5:17 PM Twitter Legal wrote, (in part):

"Hello @JohnHummasti,

In the interest of transparency, we are writing to inform you that Twitter has received a request from Pakistan Law Enforcement regarding your Twitter account, @JohnHummasti, that claims the following content violates the law(s) of Pakistan.

<https://twitter.com/JohnHummasti/status/1396910477477781504>

We have not taken any action on the reported content at this time as a result of this request."

and again on or about Sunday, November 21, 2021, 09:00:49 AM PST, Twitter Support <support@twitter.com> wrote: "Hello,

We received your appeal regarding your account. Please reply to this message and confirm that you have access to this email address. Once we receive your confirmation, we'll review the information you provided and will respond as soon as possible.

We typically suspend accounts for violations of the Twitter Rules (<https://twitter.com/rules>) or Terms of Service (<https://twitter.com/tos>). Additionally, repeat violations may result in permanent account suspension.

Thanks,

Twitter"

and once again placed Plaintiff's Twitter Account in Suspension without making any decision in regards to Plaintiff's Sunday, November 21, 2021, 09:03AM PST "Appeal" of it's decision to Suspend Plaintiff's account! On 16 December 2021, 6:07 AM Defendant Twitter "lifted" it's unlawful suspension of Plaintiff's account.

Plaintiff's Wednesday, February 24, 2021 posting on Twitter specifically stated, "@jihadwatchRS Why does the "West" tolerate followers of that pedophile Muhammad?"

Again, while this may be offensive to some Muslims, it is clearly protected speech which neither "hateful" nor "promotes violence against, nor threatens, or harasses other people on the basis of [...] religious affiliation." In fact, sex with a minor is a crime and is classified as pedophilia. In Pakistan, it is reported that there are over 1,000,000 "Child Brides" forced into "marriages" with gross, repulsive age disparities between the parties to the "marriages!"

In order to reactivate Plaintiff's Twitter account, Plaintiff was required to remove the aforesaid "Tweet." Plaintiff objects to this type of censorship as an unlawful restraint on First Amendment protected "Free Speech"

CLAIM

Defendant Biloo's 27 November 2021 *AMP* funded Chicago Anti-Semitic Hate Speech (of conspiratorial "*Jihadist*" allegations) that there is "a vast Jewish conspiracy to harm Muslims" under the guise of "Islamophobia" and statements that "Zionist Synagogues and Zionist Jews are the enemies of Muslims" is an insidious attempt to "incite violence" against the International Jewish Community and "exclude Jews out of social justice and civil rights spaces" in violation of Israeli and US Law in furtherance of a Islamic financed conspiracy by CAIR and their agents, whose stated goal is to "teach Muslim children that it is their "religious right, duty and freedom" as Muslims to practice Shari'a which permits the indiscriminate and wanton killing of Jews" and advocates an "intifada", that is, a "global jihad of genocide of the Jews" to liberate "Palestine" the indigenous⁶ homeland of the Jewish People.

CLAIM

Plaintiff further avers that since the *Interests of Justice* would be served if this Court issues Plaintiff his requested RELIEF, because Plaintiff has a vested liberty interest in the right to safe passage or conduct in regards to traversing International Borders (e.g. Israeli or Jordanian Territory) on "official business" (e.g. litigating a Petition for Writ of Repelvin, *In RE: Megillat HaNechoshet* which is being unlawfully held in Jordan), this Court should make a Declaratory Judgement with respect to Plaintiff's application for Israeli Citizenship as an Orthodox Jew under the Law of Return, and the Right to Aliyah (Emmigration) for "close Jewish settlement" which is recognized in International Treaty Law, as an Article IV, Section II constitutionally protected liberty interest guaranteed by the Anglo-American Treaty of 1924; he is entitled to freely immigrate to the Eretz Yisrael without interference by the Pakistan (or Jordanian) government(s) lodging an extradition request or an interpol red notice or

⁶ Since Treaty Law gaurantees only Jews the Political Right to "Self-Determinism" in Eretz Yisrael and since the Kingdom of Hejaz Arabs of Eretz Yisrael already exercised "Self-Determinism" at the December 1948 Jericho Conference and gained "political independence"; they do not have the right to secession from the Hashemite Kingdom or the "right of resistance" to an alleged "foreign occupation" as Jews are not foreigner to Eretz Yisrael but rather have maintained a continuous 3,000+ years presence in Eretz Yisrael and are indigenous thereto possessing uninterrupted sovereign title to all of Eretz Yisrael. *Emerson, Self-Determination*, 65 Am. J. INT'L L. 459, 465 (1971); *Delgamuukw v. British Columbia*, [1997] 3 SCR 1010 (Case Number 23799).

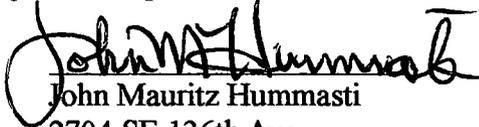
preventing his from traversing International Borders on "Official Business". As such, Plaintiff should remain free to pursue Israeli Citizenship under the First Amendment (right of association) and the "Law of Return" without threat of violence or arrest by Defendant Republic of Pakistan or those acting in concert and participation with them such as the Hashemite Kingdom of Jordan or its agents *Hamas and CAIR!*

RELIEF REQUESTED

Plaintiff requests the following relief:

- 1) A Declaratory Judgement that the actions and omissions of Defendant Twitter violates Plaintiff's right to Free Speech under the First Amendment to the US Constitution and a "Declaratory Decree" lifting of the "suspension" of Plaintiff's Twitter Account;
- 2) Injunctive Relief which would prevent Defendant Biloo from "inciting terrorism or other forms of violence through the use of Islamic Anti-Semitic hate speech" in any public or private forum and Injunctive Relief which would prevent the Pakistan Government from attempting to Arrest or Extradite Plaintiff and a Public Declaration that International Law guarantees that the Plaintiff is free to traverse "International Borders" so as to Immigrate to Eretz Yisrael without interference by the Republic of Pakistan or the Hashemite Kingdom of Jordan;
- 3) Damages in the amount of \$10,000,000.00 from Defendant Republic of Pakistan;
- 4) Damages in the amount of \$1,000,000.00 from Defendant Twitter; and,
- 5) Damages in the amount of \$1,000,000.00 from Defendant Biloo;
- 6) Any other, further or continuing relief this Court deems just and equitable.

Dated this 17th day of December, 2021.


 John Mauritz Hummasti
 2704 SE 136th Ave.
 Portland, Oregon 97236-2806
 503-327-4268

On the 17th day of December, 2021, the person known to me as John Mauritz Hummasti did personally appear before me and after oath or affirmation did swear, under the penalty of perjury to the verity of the foregoing facts.



 NOTARY PUBLIC

 My Commission Expires on: January 14 2025

