

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

**HEATHER ABBOTT; ROSEMARY
ABBOTT; DALE ABBOTT;**

**MELIDA ARREDONDO; ALEXANDER
REDONDO;**

**JEFFREY MICHAEL BAUMAN;
PATRICIA MARIE BAUMAN;
JEFFREY ALAN BAUMAN; CSILLA
ROSEMARY BAUMAN;
CHRISTOPHER JOSEPH BAUMAN;**

ELIZABETH BERMINGHAM;

**KRYSTARA NADEAU; RONALD
BRASSARD; KAREN BRASSARD;**

ELENA FLORES-BREESE;

**STEVEN BYRNE; CHARLES BYRNE;
KATHY BYRNE; KRISTI MIETZNER;**

**JEAN CAMPBELL; CHRISTOPHER
CAMPBELL; MITCHELL CAMPBELL;
TREVOR CAMPBELL; COREY
CAMPBELL;**

**ESTATE OF KRYSTLE CAMPBELL;
ESTATE OF WILLIAM CAMPBELL,
JR.; WILLIAM A. CAMPBELL (III);
PATRICIA CAMPBELL, Individually and
as Personal Representative of the Estate of
Krystle Campbell and as Personal
Representative of the Estate of William
Campbell, Jr.;**

MANYA CHYLINSKI;

JARROD CLOWERY;

**ESTATE OF SEAN COLLIER; JOSEPH
ROGERS; ANDREW COLLIER;**

Civil Action No. 1:26-cv-00126

Judge Christopher R. Cooper

**JENNIFER LEMMERMAN; NICOLE
LYNCH; JENNIFER ROGERS;
ROBERT ROGERS; KELLEY ROGERS,**
Individually and as Personal Representative
of the Estate of Sean Collier;

MICHELLE CONNOLLY;

**SYDNEY CORCORAN; CELESTE ANN
CORCORAN; TYLER CORCORAN;**

**ROBERTA CORDERO; RICHARD
CORDERO;**

**JAMES A. COSTELLO; MARGARET
COSTELLO;**

LYNN CRISCI;

KRISTIN CURRY;

ADRIANNE DAVIS;

**SABRINA DELLO RUSSO; MARIA
DELLO RUSSO; ROBERT J. DELLO
RUSSO; ROBERT BERNARDO DELLO
RUSSO;**

**RICHARD DONOHUE; KIMBERLY
DONOHUE;**

**PATRICK DOWNES; BRIAN DOWNES;
DEBORAH DOWNES; BRENDAN
DOWNES;**

ALLISON ELLIOTT;

ANNETTE EMERSON;

**AGNES FLAHERTY; ALISON
FLAHERTY;**

LEO MANUEL FONSECA, JR.;

**MARC FUCARILE; ANDREA
FUCARILE; EDWARD FUCARILE, SR.;**

**MAUREEN FUCARILE; STEPHANIE
BARON; EDWARD FUCARILE, JR.;**

**ALVARO GALVIS; MARTHA GALVIS;
LEONARDO GALVIS; MARTHA
FUSERO; ERIKA FARKAS;**

**SARAH GIROUARD; CHRISTOPHER
GIROUARD; SUSAN GIROUARD;**

**MICHAEL GROSS; NICOLE GROSS;
ERIKA MOON; CAROL DOWNING;**

JOHN HAMACHER;

**ALAN HERN; AARON HERN; ABIGAIL
HERN; KATHERINE HERN;**

FRANK DOUGLAS JULIAN;

JENNIFER KAUFFMAN;

**JESSICA KENSKY; SARAH WRIGHT;
ESTATE OF HERMAN KENSKY;
MARY KATHERINE KENSKY,
Individually and as Personal Representative
of the Estate of Herman Kensky;**

**COLTON KILGORE; KIMBERLY
KILGORE; GINA DIMARTINO; PETER
VINCENT DIMARTINO;**

**KYLE RAYMOND LARROW;
DANIELLE RENY LARROW; STEVEN
ALDEN RENY; AUDREY EPSTEIN
RENY; GILLIAN RENY NARDELLA;**

REMY JUSTINE LAWLER;

MICHELLE L'HEUREUX;

BRITTANY LORING;

MARTIN MACDONNELL;

**SARAH MACKAY; KEITH MACKAY;
DONNA MACKAY; KATIE**

**EISERMANN MACKAY; KEITH
MACKAY, JR.; KEVIN MACKAY;**

JOHN MACLELLAN;

**ESTATE OF VICTORIA MCGRATH;
JILL MCGRATH; JAMES MCGRATH,**
Individually and as Personal Representative
of the Estate of Victoria McGrath;

**KAREN MCWATTERS; ANDREW
RAND; STEPHEN RAND II; DANIEL
ENGELHARDT;**

KAITLYNN MILONE;

**JOSEPH “JP” NORDEN; PAUL JAMES
NORDEN; JOSEPH ROBERT NORDEN;
ELIZABETH NORDEN; JONATHAN
NORDEN; COLLEEN KELLI NORDEN;
CAITLIN ANNE NORDEN;**

**JOHN ODOM; KAREN ODOM;
NICOLE REIS; MATTHEW REIS;
JACOB REIS;**

NICOLE O’NEIL;

AMY O’NEILL;

**CAROLINE REINSCH; CHRISTIAN
WILLIAMS;**

JOSEPH REYNOLDS;

**ESTATE OF MARTIN RICHARD;
DENISE RICHARD; JANE RICHARD;
HENRY RICHARD; WILLIAM
RICHARD,** Individually and as Personal
Representative of the Estate of Martin
Richard;

LAURIE SCHER;

**ROSEANN SDOIA MATERIA;
MICHAEL MATERIA; EUGENE**

SDOIA; ROSEMARIE BUCKLEY; GIA BUCKLEY;

SHANNON SILVESTRI; KEVIN SILVESTRI; ZACHARY SILVESTRI; MORGAN EVERTON;

ESTATE OF DENNIS “DJ” SIMMONDS; DENNIS SIMMONDS; ROXANNE SIMMONDS; NICOLE SIMMONDS,
Individually and as Personal Representative
of the Estate of Dennis “DJ” Simmonds;

LAUREN SNICKENBERGER; MARK SNICKENBERGER;

ELIZABETH SOBIECH; PETER SOBIECH;

ELIZA TIERNEY;

MILDRED VALVERDE; MICHAEL MESFIN; SARA VALVERDE PEREZ; JOSELYN PEREZ;

REBEKAH VARNEY; TIMOTHY GREGORY; TINA GREGORY; NOAH VARNEY;

MICHAEL WARD;

ALISSA WARD;

JACQUI WEBB; BARBARA WEBB; JANEL WEBB; KRISTIN LOEHNING; DAVID PIETRANTONIO;

DR. SCOTT ROSS WEISBERG; ILENE WEISBERG; JOSHUA WEISBERG; JESSICA WEISBERG;

ERIC TAYLOR WHALLEY; ANN WHALLEY; CHRISTOPHER WHALLEY; RICHARD TAYLOR WHALLEY;

ROBERT WHEELER;

ESTATE OF WILLIAM WHITE;

ESTATE OF KEVIN WHITE; ANDREW

WHITE, Individually and as Personal

Representative of the Estate of Kevin White;

MARY JO WHITE, Individually and as

Personal Representative of the Estate of

William White;

LINDA WITT; DAN WITT; WILLIAM

TANGUAY;

AMBER WOOLFENDEN; STEVE

WOOLFENDEN; LEO WOOLFENDEN;

DAVID ENRIQUE YEPEZ; GISELA

ANA LUCIA YEPEZ; LUIS ENRIQUE

YEPEZ; ANDREA CRISTINA YEPEZ

Plaintiffs,

v.

THE ISLAMIC REPUBLIC OF IRAN

c/o Ministry of Foreign Affairs

Ali Bagheri, Minister

MFA Building

Iman Khomeini Avenue

Tehran, Iran

AND

THE IRANIAN MINISTRY OF

INTELLIGENCE AND SECURITY

Second Negarestan Street

Pasdaran Avenue

Golestan Yekom

Tehran, Iran,

Defendants.

SECOND AMENDED COMPLAINT

I. INTRODUCTION

1. This action is brought by *Heather Abbott et al.*, through counsel, against the Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security for providing material support and resources in connection with the April 15, 2013 Boston Marathon bombing and related acts of terrorism in and around Boston, Massachusetts. The bombing, which killed three and injured several hundred others, was the largest terrorist attack on U.S. soil since September 11, 2001. For three days, a manhunt for the bombers ensued, resulting in the murder of a police officer, kidnapping of a civilian, and shootout between the bombers and law enforcement. The Plaintiffs are U.S. citizens who were wounded in the Boston Marathon attack and the subsequent manhunt, and the families and estates of those who were killed or wounded.

II. JURISDICTION AND VENUE

2. This Court exercises both subject matter jurisdiction and personal jurisdiction over the Islamic Republic of Iran (“Iran”) and the Iranian Ministry of Intelligence and Security (“MOIS”) (collectively, “Defendants”) as set forth at 28 U.S.C. §§ 1605(a)(5) and 1605B of the Foreign Sovereign Immunities Act (“FSIA”), 28 U.S.C § 1602 *et seq.*

3. The FSIA grants U.S. district courts “original jurisdiction without regard to amount in controversy of any nonjury civil action against a foreign state . . . as to any claim for relief in personam with respect to which the foreign state is not entitled to immunity[.]” 28 U.S.C. § 1330(a). Iran is a foreign state and the MOIS is an agency or instrumentality of a foreign state under 28 U.S.C. § 1603(b). Plaintiffs seek relief against Defendants in personam through a nonjury civil action.

4. Defendants are not immune from the jurisdiction of U.S. courts because, pursuant

to 28 U.S.C. § 1605A(a)(1), Plaintiffs seek money damages against Defendants for providing material support for personal injuries and deaths and for providing material support and resources in connection with acts of extrajudicial killings, which were engaged in by Defendants' officials, employees, and agents while acting within the scope of their office, employment, or agency.

5. Because the acts complained of occurred in the United States, Plaintiffs need not afford Defendants "a reasonable opportunity to arbitrate the claim in accordance with the accepted international rules of arbitration," pursuant to 28 U.S.C. § 1605A(a)(2)(A)(iii).

6. The Justice Against Sponsors of Terrorism Act ("JASTA") abrogates foreign sovereign immunity in cases where money damages are sought against a foreign state in connection with an act of international terrorism that occurred in the United States. 28 U.S.C. § 1605B(b)(1).

7. Defendants are not immune from the jurisdiction of U.S. courts because, pursuant to 28 U.S.C. § 1605B(b)(2), Plaintiffs seek money damages against Defendants for their tortious acts in connection with an act of international terrorism, which were engaged by Defendants' officials, employees, and agents while acting within the scope of their office, employment, or agency.

8. Venue in this Court is proper in accordance with the provisions of 28 U.S.C. § 1391(f)(4), which provides, in pertinent part, that a civil action against a foreign state may be brought in the United States District Court for the District of Columbia.

III. THE PARTIES

9. The named Plaintiffs in this action are United States citizens, their heirs at law and legatees, and their immediate family members, all of whom are qualified as claimants in

accordance with 28 U.S.C. § 1605A(a)(ii). Plaintiffs were runners, spectators, police officers, and their family members who suffered physical and/or emotional injuries or were killed as a result of the terrorist attack targeting civilians at the Boston Marathon on April 15, 2013 and the ensuing manhunt.

10. Defendant Iran is a foreign state which was, at the time of the acts hereinafter complained of, and is to the present, designated as a state sponsor of terrorism in 49 FED. REG. 2836, Jan 23, 1984, pursuant to Section 6(j) of the Export Administration Act of 1979, 50 U.S.C. App. 2405(j).

11. Defendant MOIS is an agency of Defendant Iran whose activities included, at all times relevant to this action, the promotion of terrorist acts directed against United States citizens, by and through material support to the terrorist organization known as “Al-Qaeda.” In 2010, Al-Qaeda’s branch, Al-Qaeda in the Arabian Peninsula (“AQAP”), was designated as a Foreign Terrorist Organization by the United States Department of State. That year, AQAP began publishing *Inspire*, an English language magazine, to radicalize readers and provide practical guidance on ways to engage in terrorist attacks against the West. Through the “open source jihad” (“OSJ”) section of the magazine, AQAP provided a wide range of technical advice, including instructions on building homemade pressure cooker bombs, which were used by the Tsarnaev brothers in the Boston Marathon bombing.

IV. STATEMENT OF FACTS

A. Boston Marathon Bombing

12. At approximately 2:30 PM, on April 15, 2013, brothers Tamerlan Tsarnaev and Dzhokhar Tsarnaev placed two homemade bombs in a crowd of people near the finish line of the 117th annual Boston Marathon.

13. The bombs, made using pressure cookers and packed with nails and other shrapnel, were hidden in backpacks placed strategically near spectators who were lined up along the marathon route to cheer on the runners. One bomb was placed in front of a crowded restaurant called Forum on Boylston Street, and the other bomb was planted approximately 180 yards up the course on the same street.

14. At 2:49 PM, the Tsarnaev brothers detonated both bombs, killing three people from the blasts: an eight-year-old boy, a twenty-nine-year-old restaurant manager, and a twenty-three-year-old Chinese graduate student at Boston University.

15. Medical personnel, emergency responders, and other spectators rushed to aid those who had been critically injured by the explosions. Hundreds of people were injured by the blasts and many were transported to twenty-six hospitals across the city.

16. Investigators found hundreds of pieces of shrapnel—nails, tacks, and BBs—on the street, inside buildings, and on top of buildings. The same metal shrapnel was found in the bodies, hair, and clothing of victims who were treated by ER doctors. The sound of the blasts also caused permanent hearing damage and loss to nearby spectators and runners.

17. That day, twelve patients underwent either above or below knee lower extremity amputations and two patients underwent bilateral amputations. At least forty-seven of the patients who received immediate surgery required subsequent operations for orthopedic stabilization and removal of damaged tissue. Many more victims continue to receive physical and psychological treatment for the injuries caused by the bombings.

B. Manhunt for the Tsarnaev Brothers

18. By 6:54 PM, a 12-block area of the crime scene was secured, and law enforcement mutual aid units arrived on scene to assist with investigations.

19. The next day, on April 16, 2013, President Barack Obama announced that the Federal Bureau of Investigation was investigating the attack as an act of terrorism.

20. During the immediate three days that followed, the city of Boston remained in terror as the manhunt for the bombers continued.

21. On April 18, 2013, the FBI sought assistance from the public and released photos and videos of two male suspects who were later identified as the Tsarnaev brothers.

22. Following the Boston Marathon bombing, the Tsarnaev brothers planned to travel to New York City and place a similar set of bombs in Times Square. In preparation for the next attack, the brothers went out in search of a gun.

23. That evening, they drove by the MIT campus in a Honda Civic, where they saw Sean Collier, a twenty-seven-year-old police officer sitting in his cruiser. Around 10:31 PM, the Tsarnaev brothers approached the cruiser, leaned in, and shot Officer Collier three times at point-blank range in the head and three times in his right hand. After the brothers failed to take the gun out of his holder lock, they fled the scene.

24. The brothers drove into Boston in search of a car that would not be traced back to them or the murder of Officer Collier.

25. At 11:20 PM, the Tsarnaev brothers carjacked a leased Mercedes SUV, kidnapped the driver, Dun Meng, and robbed him of \$800. They then forced him at gunpoint to drive to a gas station in Cambridge. While Dzhokhar Tsarnaev was in the gas station buying snacks, Dun Meng jumped out of the car and escaped. He called 911 and informed the Cambridge Police Department of what had happened. He also notified the police that the SUV had a manufacturer tracking system, which the police subsequently activated.

26. By this time, Dzhokhar Tsarnaev had gotten back into the Honda Civic and Tamerlan Tsarnaev was driving the carjacked SUV. Both cars were headed towards Boston.

27. The Cambridge Police Department used GPS tracking to locate the carjacked SUV, and around 12:41 AM, contacted the Watertown Police Department with information that the SUV was moving down a residential street in Watertown. Two Watertown police officers responded to the area. Officer Joseph Reynolds identified the cars and followed them down the street.

28. In the middle of the street, the brothers stopped their cars, got out, and fired at Officer Reynolds. They exchanged gunfire and Sergeant John MacLellan arrived at the scene.

29. Sergeant Dennis “DJ” Simmonds arrived at the scene as one of the first Boston police officers to respond.

30. The brothers shot at the officers and detonated a pressure cooker bomb and several pipe bombs. Officer Simmonds suffered a severe head injury when one of the brothers threw an explosive device at him.

31. A third Watertown police officer arrived at the scene, and when Tamerlan Tsarnaev ran out of ammunition, the officers tackled him and tried to handcuff him.

32. While the officers were attempting to arrest Tamerlan Tsarnaev, Dzhokhar Tsarnaev got back into the carjacked SUV and drove it at top speed towards the officers. At the last moment, the officers jumped off and Dzhokhar Tsarnaev ran over his brother, dragging his body about 50 feet down the street. Tamerlan Tsarnaev later died from these injuries.

33. Other officers that had responded to the scene began shooting at Dzhokhar Tsarnaev as he continued to drive down the street. A stray bullet hit MBTA Officer Richard

Donohue who lost a significant amount of blood but survived after he was quickly transported to a hospital.

34. Dzhokhar Tsarnaev drove a little further before ditching the carjacked SUV and hiding in a boat in the backyard of a Watertown residence. The next day, Dzhokhar Tsarnaev was discovered in the boat and taken into custody.

C. AQAP's *Inspire* Magazine

35. Following his capture, FBI agents recovered Dzhokhar Tsarnaev's laptop and a thumb drive that contained several issues of *Inspire* magazine from 2010 to 2013, including one of the articles, *Make a Bomb in the Kitchen of Your Mom*, which was published in the Spring 2013 issue. Agents also found files of audio sermons by Anwar al-Awlaki, an American-born Muslim preacher who was a key figure behind *Inspire* magazine. Anwar al-Awlaki was the foremost English-speaking recruiter of Al-Qaeda, who espoused violence against the United States as a form of religious duty.

36. *Inspire* magazine was first published in 2010 by AQAP through its propaganda arm, Al-Malahem Media. It was founded and edited by Samir Khan and Anwar al-Awlaki who were both killed in a U.S. drone strike in Yemen in September 2011.

37. *Inspire* magazine is styled as a glossy magazine and seeks to radicalize and recruit individuals in the West to go after "enemies of Islam." A typical *Inspire* issue contains a Letter from the Editor, main articles, and its most prominent OSJ section, which provides technical advice on how to carry out acts of violence. The articles justify violence against civilians by arguing that the West, and the United States in particular, is openly hostile to Islam and must be defeated.

38. Featured in the OSJ section, *Make a Bomb in the Kitchen of Your Mom*, provided a manual to empower readers to take action. Using instructional images, it explained how to build a bomb using a pressure cooker and materials that could be easily obtained. The manual also instructed the user to place the pressure cooker bombs close to the intended target due to the short range of the shrapnel.

39. During the investigation, Dzhokhar Tsarnaev told law enforcement agents that he and his brother were ideologically motivated by *Inspire* magazine and used the self-help manual in the magazine to build the pressure cooker bombs that were detonated near the Boston Marathon.

40. In its May 2013 issue, *Inspire* magazine focused extensively on the Boston Bombing, praising the “Lone Jihad operation,” and writing that the “Boston Bombings have uncovered the capabilities of the Muslim youth” and “they have revealed the power of a Lone Jihad operation.” In an article titled “Inspired by Inspire,” the magazine took credit for the attack, stating that “the contents of the magazine as a whole” and the specific bomb making instructions allowed the Tsarnaev brothers to carry out the bombings.

D. Defendants Iran and MOIS’s Material Support to Al-Qaeda

41. Defendant Iran and its agencies and instrumentality, Iranian Ministry of Intelligence and Security, have long provided material support and resources to Al-Qaeda and affiliated terrorist organizations.

42. According to the 9/11 Commission Report, meetings took place between Al-Qaeda and Iranian operatives in Sudan beginning in the early 1990s. They entered into an informal agreement to coordinate on actions carried out against the United States, Israel, and other western countries.

43. In a December 18, 2001 statement, J.T. Caruso, Acting Assistant Director of the Counter-Terrorism Division of the FBI testified that an FBI witness had revealed that Al-Qaeda obtained specialized terrorist training from and worked with Iranian government officials.

44. Iran also helped facilitate the transit of Al-Qaeda operatives in and out of Afghanistan. In an April 2002 press release, Defense Secretary Donald Rumsfeld noted, “there is no question but that Al Qaeda has moved into Iran, out of Iran to the south and dispersed to some other countries.”

45. The Iranian MOIS was aware of the concentration of Al-Qaeda terrorists in the region but took no action against them. While testifying before the U.S. Senate in February 2003, CIA Director George Tenet explained, “[w]e see disturbing signs that Al Qaeda has established a presence in both Iran and Iraq.”

46. AQAP was established in 2009 as the Saudi and Yemeni branches of Al-Qaeda consolidated. AQAP grew rapidly and has attempted to carry out and inspire attacks in the United States and Europe. Due to its aggressive approach towards the United States, AQAP was designated as a Foreign Terrorist Organization by the United States Department of State within a year of its founding.

47. In a March 2010 written statement to the Senate Armed Services Committee, U.S. Army General David H. Petraeus stated that “Al-Qaeda continues to use Iran as a key facilitation hub, where facilitators connect Al-Qaeda’s senior leadership to regional affiliates.”

48. In July 2011, the U.S. Treasury accused Iranian officials of aiding Al-Qaeda by entering into an agreement to allow the country to be used as a transit point for funneling money and people from the Persian Gulf to Pakistan and Afghanistan. In a statement, the Treasury said, “[t]his network serves as the core pipeline through which Al Qaeda moves money, facilitators

and operatives from across the Middle East to South Asia, including to Atiyah Abd al-Rahman, a key Al Qaeda leader based in Pakistan[.]”

49. In a January 2021 speech to the National Press Club, Secretary of State Michael Pompeo explained that a letter from Osama bin Laden, found by Navy SEALs during the Abbottabad raid, summed up the relationship between Iran and Al-Qaeda since 9/11. In that letter, bin Laden wrote, “Iran is our main artery for funds, personnel, and communication[.]”

50. As a result of Iran and its agencies and instrumentalities’ material support of Al-Qaeda, including but not limited to providing financing, training, and protection, Al-Qaeda was able to create and publish *Inspire* Magazine, which was used by the Tsarnaev brothers to carry out the bombing at the Boston Marathon and subsequent acts of violence.

V. INDIVIDUAL ALLEGATIONS

51. On April 15, 2013, when the explosive devices described above were detonated, **Heather Abbott**, resident of and citizen of the United States, suffered severe and permanent injuries, including the amputation of her left leg and loss of hearing, which have resulted in post-traumatic stress disorder.

52. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Rosemary Abbott**, the mother of Heather Abbott, and **Plaintiff Dale Abbott**, the father of Heather Abbott, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

53. On April 15, 2013, when the explosive devices described above were detonated, **Melida Arredondo**, resident of and citizen of the United States, suffered severe and permanent injuries, including hearing loss, which has resulted in post-traumatic stress disorder.

54. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Alexander Redondo**, the husband of Melida Arredondo, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

55. On April 15, 2013, when the explosive devices described above were detonated, **Alexander Redondo**, resident of and citizen of the United States, suffered severe and permanent injuries, including hearing loss, which has resulted in post-traumatic stress disorder.

56. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Melida Arredondo**, the wife of Alexander Redondo, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

57. On April 15, 2013, when the explosive devices described above were detonated, **Jeffrey Michael Bauman**, resident of and citizen of the United States, suffered severe and permanent injuries, including above knee amputation of both legs, shrapnel wounds on the back and right triceps, and loss of hearing in both ears, which have resulted in post-traumatic stress disorder.

58. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran

including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Patricia Marie Bauman**, the mother of Jeffrey Michael Bauman, **Plaintiff Jeffrey Alan Bauman**, the father of Jeffrey Michael Bauman, **Plaintiff Csilla Rosemary Bauman**, the stepmother of Jeffrey Michael Bauman, and **Plaintiff Christopher Joseph Bauman**, the sibling of Jeffrey Michael Bauman, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

59. On April 15, 2013, when the explosive devices described above were detonated, **Elizabeth Bermingham**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds, burns on her leg and torso, and tinnitus, which have resulted in post-traumatic stress disorder.

60. On April 15, 2013, when the explosive devices described above were detonated, **Ronald Brassard**, resident of and citizen of the United States, suffered severe and permanent injuries, including damage to the lower left leg artery requiring four surgeries, which have resulted in post-traumatic stress disorder.

61. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Karen Brassard**, the wife of Ronald Brassard, and **Plaintiff Krystara Nadeau**, the child of Ronald Brassard, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

62. On April 15, 2013, when the explosive devices described above were detonated, **Karen Brassard**, resident of and citizen of the United States, suffered severe and permanent

injuries, including shrapnel wounds in both legs, compartment syndrome in one leg, traumatic brain injury, and loss of hearing, which have resulted in post-traumatic stress disorder.

63. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Ronald Brassard**, the husband of Karen Brassard, and **Plaintiff Krystara Nadeau**, the child of Karen Brassard, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

64. On April 15, 2013, when the explosive devices described above were detonated, **Krystara Nadeau**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds in both legs and a sprained ankle, which have resulted in post-traumatic stress disorder.

65. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Ronald Brassard**, the father of Krystara Nadeau, and **Plaintiff Karen Brassard**, the mother of Krystara Nadeau, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

66. On April 15, 2013, when the explosive devices described above were detonated, **Elena Flores-Breese**, resident of and citizen of the United States, suffered severe and permanent injuries, including traumatic brain injury and loss of hearing, which have resulted in post-traumatic stress disorder.

67. On April 15, 2013, when the explosive devices described above were detonated, **Steven Byrne**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds in the face and neck, blast burns requiring multiple skin grafts and reconstructive surgery, loss of hearing in the left ear, and motion sickness, which have resulted in post-traumatic stress disorder.

68. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kathy Byrne**, the mother of Steven Byrne, **Plaintiff Charles Byrne**, the father of Steven Byrne, and **Plaintiff Kristi Mietzner**, the sibling of Steven Byrne, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

69. On April 15, 2013, when the explosive devices described above were detonated, **Jean Campbell**, resident of and citizen of the United States, suffered severe and permanent injuries, including traumatic brain injury, sudden bilateral sensorineural hearing loss, tinnitus, migraine, and vertigo, which have resulted in post-traumatic stress disorder.

70. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Christopher Campbell**, the husband of Jean Campbell, and **Plaintiff Mitchell Campbell**, **Plaintiff Trevor Campbell**, and **Plaintiff Corey Campbell**, the children of Jean Campbell, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

71. On April 15, 2013, when the explosive devices described above were detonated, **Mitchell Campbell**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wound, hearing loss, and tinnitus, which have resulted in post-traumatic stress disorder.

72. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Jean Campbell**, the mother of Mitchell Campbell, **Plaintiff Christopher Campbell**, the father of Mitchell Campbell, and **Plaintiff Trevor Campbell and Plaintiff Corey Campbell**, the siblings of Mitchell Campbell, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

73. On April 15, 2013, when the explosive devices described above were detonated, **Christopher Campbell**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder.

74. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Jean Campbell**, the wife of Christopher Campbell, and **Plaintiff Mitchell Campbell, Plaintiff Trevor Campbell, and Plaintiff Corey Campbell**, the children of Christopher Campbell, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

75. On April 15, 2013, when the explosive devices described above were detonated, **Trevor Campbell**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder and depression.

76. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Jean Campbell**, the mother of Trevor Campbell, **Plaintiff Christopher Campbell**, the father of Trevor Campbell, and **Plaintiff Mitchell Campbell and Plaintiff Corey Campbell**, the siblings of Trevor Campbell, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

77. On April 15, 2013, when the explosive devices described above were detonated, **Corey Campbell**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder and depression.

78. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Jean Campbell**, the mother of Corey Campbell, **Plaintiff Christopher Campbell**, the father of Corey Campbell, and **Plaintiff Mitchell Campbell and Plaintiff Trevor Campbell**, the siblings of Corey Campbell, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

79. On April 15, 2013, when the explosive devices described above were detonated, **Krystle Campbell**, resident of and citizen of the United States, suffered fatal injuries.

80. Decedent, **Krystle Campbell**, from the time of injury to her death thereafter, suffered extreme bodily pain and suffering as a result of the actions described above which were undertaken by the agents of Defendants.

81. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, Patricia Campbell as personal representative of **Plaintiff the Estate of William Campbell, Jr.**, the father of Krystle Campbell, **Plaintiff Patricia Campbell**, the mother of Krystle Campbell, and **Plaintiff William A. Campbell (III)**, the sibling of Krystle Campbell, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

82. On April 15, 2013, when the explosive devices described above were detonated, **Manya Chylinski**, resident of and citizen of the United States, suffered severe and permanent injuries, including chronic pain resulting from post-traumatic stress disorder.

83. On April 15, 2013, when the explosive devices described above were detonated, **Jarrod Clowery**, resident of and citizen of the United States, suffered severe and permanent injuries, including second-degree burns over ten percent of his body, and extensive shrapnel wounds requiring surgery, which have resulted in post-traumatic stress disorder.

84. On April 18, 2013, when the Tsarnaev brothers approached Sean Collier's vehicle and shot him six times, **Sean Collier**, resident of and citizen of the United States, suffered fatal injuries.

85. Decedent, **Sean Collier**, from the time of injury to his death thereafter, suffered extreme bodily pain and suffering as a result of the actions described above which were undertaken by the agents of Defendants.

86. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kelley Rogers**, the mother of Sean Collier, **Plaintiff Joseph Rogers**, the stepfather of Sean Collier, **Plaintiff Andrew Collier, Plaintiff Nicole Lynch, and Plaintiff Jennifer Lemmerman**, the siblings of Sean Collier, and **Plaintiff Jennifer Rogers and Plaintiff Robert Rogers**, the stepsiblings of Sean Collier, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

87. On April 15, 2013, when the explosive devices described above were detonated, **Michelle Connolly**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to her right eye, a concussion, bruising on her body, and ringing and hearing loss in her left ear, which have resulted in post-traumatic stress disorder.

88. On April 15, 2013, when the explosive devices described above were detonated, **Celeste Anne Corcoran**, resident of and citizen of the United States, suffered severe and permanent injuries, including the amputation of both legs, loss of hearing, and loss of teeth, which have resulted in post-traumatic stress disorder.

89. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Sydney Corcoran and Plaintiff Tyler Corcoran**, the children of Celeste Anne Corcoran, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

90. On April 15, 2013, when the explosive devices described above were detonated, **Sydney Corcoran**, resident of and citizen of the United States, suffered severe and permanent injuries, including a severed femoral artery in the right leg from shrapnel, a concussion, blast burns, and hearing loss in the right ear, which have resulted in post-traumatic stress disorder.

91. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Celeste Anne Corcoran**, the mother of Sydney Corcoran, and **Plaintiff Tyler Corcoran**, the sibling of Sydney Corcoran, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

92. On April 15, 2013, when the explosive devices described above were detonated, **Richard Cordero**, resident of and citizen of the United States, suffered severe and permanent injuries, including a torn meniscus in his right knee and loss of hearing in the left ear, which have resulted in post-traumatic stress disorder.

93. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Roberta Cordero**, the wife of Richard Cordero, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

94. On April 15, 2013, when the explosive devices described above were detonated, **James J. Costello**, resident of and citizen of the United States, suffered severe and permanent injuries, including severe burns, shrapnel wounds, and wrist injuries, which have resulted in post-traumatic stress disorder.

95. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff James A. Costello**, the father of James J. Costello, and **Plaintiff Margaret Costello**, the mother of James J. Costello, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

96. On April 15, 2013, when the explosive devices described above were detonated, **Lynn Crisci**, resident of and citizen of the United States, suffered severe and permanent injuries, including traumatic brain injury, loss of hearing, connective tissue disorder, and dysautonomia, which have resulted in post-traumatic stress disorder.

97. On April 15, 2013, when the explosive devices described above were detonated, **Kristin Curry**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder.

98. On April 15, 2013, when the explosive devices described above were detonated, **Adrianne Davis**, resident of and citizen of the United States, suffered severe and permanent injuries, including the amputation of her left leg and scarring on her right leg, which have resulted in post-traumatic stress disorder.

99. On April 15, 2013, when the explosive devices described above were detonated, **Sabrina Dello Russo**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to her right leg and traumatic brain injury, which have resulted in post-traumatic stress disorder.

100. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran

including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Maria Dello Russo**, the mother of Sabrina Dello Russo, **Plaintiff Robert J. Dello Russo**, the father of Sabrina Dello Russo, and **Plaintiff Robert Bernardo Dello Russo**, the sibling of Sabrina Dello Russo, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

101. On April 19, 2013, when the Tsarnaev brothers threw explosives and engaged in a shootout with police officers, **Richard Donohue**, resident of and citizen of the United States, suffered severe and permanent injuries, including a gunshot wound to his right leg that severed a femoral artery, traumatic brain injury, and loss of memory, which have resulted in post-traumatic stress disorder.

102. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kimberly Donohue**, the wife of Richard Donohue, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

103. On April 15, 2013, when the explosive devices described above were detonated, **Patrick Downes**, resident of and citizen of the United States, suffered severe and permanent injuries, including the amputation of a leg, head injuries, blast burns, and two ruptured ear drums, which have resulted in post-traumatic stress disorder.

104. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Deborah Downes**, the mother of Patrick Downes, **Plaintiff Brian Downes**, the father of Patrick

Downes, **Plaintiff Jessica Kensky**, the wife of Patrick Downes, and **Plaintiff Brendan Downes**, the sibling of Patrick Downes, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

105. On April 15, 2013, when the explosive devices described above were detonated, **Allison Elliott**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds in the face and loss of hearing in the left ear, which have resulted in post-traumatic stress disorder.

106. On April 15, 2013, when the explosive devices described above were detonated, **Annette Emerson**, resident of and citizen of the United States, suffered severe and permanent injuries, including loss of hearing, traumatic brain injury, severe tinnitus, pain from ruptured ear drums, daily vertigo symptoms, dental issues, and exacerbated chronic fibromyalgia, which have resulted in post-traumatic stress disorder.

107. On April 15, 2013, when the explosive devices described above were detonated, **Agnes Flaherty**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to her right leg, which have resulted in post-traumatic stress disorder.

108. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Alison Flaherty**, the child of Agnes Flaherty, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

109. On April 15, 2013, when the explosive devices described above were detonated, **Alison Flaherty**, resident of and citizen of the United States, suffered severe and permanent

injuries, including cuts and bruises as well as headaches and vertigo, which have resulted in post-traumatic stress disorder.

110. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Agnes Flaherty**, the mother of Alison Flaherty, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

111. On April 15, 2013, when the explosive devices described above were detonated, **Leo Manuel Fonseca, Jr.**, resident of and citizen of the United States, suffered severe and permanent injuries, including loss of hearing in the left ear, which has resulted in post-traumatic stress disorder.

112. On April 15, 2013, when the explosive devices described above were detonated, **Marc Fucarile**, resident of and citizen of the United States, suffered severe and permanent injuries, including the above knee amputation of his right leg, traumatic brain injury, shrapnel wounds, third degree burns requiring skin grafts, loss of hearing, and damage to teeth, which have resulted in post-traumatic stress disorder.

113. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Edward Fucarile, Sr.**, the father of Marc Fucarile, **Plaintiff Andrea Fucarile**, the stepmother of Marc Fucarile, **Plaintiff Maureen Fucarile**, the mother of Marc Fucarile, **Plaintiff Stephanie Baron and Plaintiff Edward Fucarile, Jr.**, the siblings of Marc Fucarile, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

114. On April 15, 2013, when the explosive devices described above were detonated, **Alvaro Galvis**, resident of and citizen of the United States, suffered severe and permanent injuries, including an eight-to-nine-inch shrapnel wound in his right thigh and all over the back, which have resulted in post-traumatic stress disorder.

115. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Martha Galvis**, the wife of Alvaro Galvis, and **Plaintiff Leonardo Galvis, Plaintiff Martha Fusero, and Plaintiff Erika Farkas**, the children of Alvaro Galvis, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

116. On April 15, 2013, when the explosive devices described above were detonated, **Martha Galvis**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to her left leg that caused nerve damage and muscle loss, blast burns to her left hand requiring multiple skin grafts, and fifteen reconstructive surgeries on her left hand that resulted in the amputation of one finger and disfigurement of her left hand, which have resulted in post-traumatic stress disorder.

117. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Alvaro Galvis**, the husband of Martha Galvis, and **Plaintiff Leonardo Galvis, Plaintiff Martha Fusero, and Plaintiff Erika Farkas**, the children of Martha Galvis, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

118. On April 15, 2013, when the explosive devices described above were detonated, **Sarah Girouard**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds that fractured her shin and heel bones and hearing loss, which have resulted in post-traumatic stress disorder.

119. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Christopher Girouard**, the father of Sarah Girouard, and **Plaintiff Susan Girouard**, the mother of Sarah Girouard, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

120. On April 15, 2013, when the explosive devices described above were detonated, **Michael Gross**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to the arms and legs and blast burns, which have resulted in post-traumatic stress disorder.

121. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Nicole Gross**, the wife of Michael Gross, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

122. On April 15, 2013, when the explosive devices described above were detonated, **Nicole Gross**, resident of and citizen of the United States, suffered severe and permanent injuries, including a right leg fracture, severed right Achilles, right ankle blast injury, and hearing loss, which have resulted in post-traumatic stress disorder.

123. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Michael Gross**, the husband of Nicole Gross, **Plaintiff Erika Moon**, the sibling of Nicole Gross, and **Plaintiff Carol Downing**, the mother of Nicole Gross, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

124. On April 15, 2013, when the explosive devices described above were detonated, **Erika Moon**, resident of and citizen of the United States, suffered severe and permanent injuries, including the below knee amputation of her left leg, severe injuries to her right leg, severe shrapnel wounds in the right buttock, and ruptured ear drums in both ears, which have resulted in post-traumatic stress disorder.

125. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Nicole Gross**, the sibling of Erika Moon, and **Plaintiff Carol Downing**, the mother of Erika Moon, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

126. On April 15, 2013, when the explosive devices described above were detonated, **Plaintiff Carol Downing**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder and depression.

127. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Nicole**

Gross and Plaintiff Erika Moon, the children of Carol Downing, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

128. On April 15, 2013, when the explosive devices described above were detonated, **Plaintiff John Hamacher**, resident of and citizen of the United States, suffered severe and permanent injuries, including tinnitus and hearing loss, which have resulted in post-traumatic stress disorder.

129. On April 15, 2013, when the explosive devices described above were detonated, **Aaron Hern**, resident of and citizen of the United States, suffered severe and permanent injuries, including a major shrapnel wound to the upper thigh of the left leg, multiple shrapnel injuries in both legs, ruptured ear drum, and blast burns, which have resulted in post-traumatic stress disorder.

130. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Alan Hern**, the father of Aaron Hern, **Plaintiff Katherine Hern**, the mother of Aaron Hern, and **Plaintiff Abigail Hern**, the sibling of Aaron Hern, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

131. On April 15, 2013, when the explosive devices described above were detonated, **Katherine Hern**, resident of and citizen of the United States, suffered severe and permanent injuries, including anxiety, depression, and post-traumatic stress disorder.

132. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Alan**

Hern, the husband of Katherine Hern, and **Plaintiff Aaron Hern and Plaintiff Abigail Hern**, the children of Katherine Hern, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

133. On April 15, 2013, when the explosive devices described above were detonated, **Frank Douglas Julian**, resident of and citizen of the United States, suffered severe and permanent injuries, including a left shoulder replacement and tinnitus, which have resulted in post-traumatic stress disorder.

134. On April 15, 2013, when the explosive devices described above were detonated, **Jennifer Kauffman**, resident of and citizen of the United States, suffered severe and permanent injuries, including traumatic brain injury, internal abdominal injuries, and loss of hearing, which have resulted in post-traumatic stress disorder.

135. On April 15, 2013, when the explosive devices described above were detonated, **Jessica Kensky**, resident of and citizen of the United States, suffered severe and permanent injuries, including below knee amputation of both legs, blast burns and scars, ruptured ear drums, and traumatic brain injury, which have resulted in post-traumatic stress disorder.

136. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Mary Katherine Kensky**, the mother of Jessica Kensky, Mary Katherine Kensky as personal representative of **Plaintiff the Estate of Herman Kensky**, the father of Jessica Kensky, **Plaintiff Patrick Downes**, the husband of Jessica Kensky, and **Plaintiff Sarah Wright**, the sibling of Jessica Kensky, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

137. On April 15, 2013, when the explosive devices described above were detonated, **Colton Kilgore**, resident of and citizen of the United States, suffered severe and permanent injuries, including perforated eardrums and shrapnel wounds, which have resulted in post-traumatic stress disorder.

138. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kimberly Kilgore**, the wife of Colton Kilgore, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

139. On April 15, 2013, when the explosive devices described above were detonated, **Kimberly Kilgore**, resident of and citizen of the United States, suffered severe and permanent injuries, including loss of hearing and shrapnel wounds, which have resulted in post-traumatic stress disorder.

140. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Colton Kilgore**, the husband of Kimberly Kilgore, and **Plaintiff Gina DiMartino and Plaintiff Peter Vincent DiMartino**, the siblings of Kimberly Kilgore, and, the endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

141. On April 15, 2013, when the explosive devices described above were detonated, **Gina DiMartino**, resident of and citizen of the United States, suffered severe and permanent injuries, including the removal of her right calf muscle, loss of sensation below the right knee,

loss of movement in right toes and foot, and chronic pain, which have resulted in post-traumatic stress disorder.

142. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kimberly Kilgore and Plaintiff Peter Vincent DiMartino**, the siblings of Gina DiMartino, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

143. On April 15, 2013, when the explosive devices described above were detonated, **Peter Vincent DiMartino**, resident of and citizen of the United States, suffered severe and permanent injuries, including over ten percent of body covered in second-degree blast burns, shrapnel wounds, Achilles tendon tear, and several bone fractures, which have resulted in post-traumatic stress disorder.

144. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kimberly Kilgore and Plaintiff Gina DiMartino**, the siblings of Peter Vincent DiMartino, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

145. On April 15, 2013, when the explosive devices described above were detonated, **Kyle Raymond Larrow**, resident of and citizen of the United States, suffered severe and permanent injuries, including burns, extensively embedded shrapnel, damaged ear drums, and scarring on the arms, which have resulted in post-traumatic stress disorder.

146. On April 15, 2013, when the explosive devices described above were detonated, **Danielle Reny Larrow**, resident of and citizen of the United States, suffered severe and permanent injuries, including a sprained ankle, which have resulted in post-traumatic stress disorder.

147. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Steven Alden Reny**, the father of Danielle Reny Larrow, **Plaintiff Audrey Epstein Reny**, the mother of Danielle Reny Larrow, and **Plaintiff Gillian Reny Nardella**, the sibling of Danielle Reny Larrow, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

148. On April 15, 2013, when the explosive devices described above were detonated, **Steven Alden Reny**, resident of and citizen of the United States, suffered severe and permanent injuries, including loss of hearing and shrapnel wounds, which have resulted in post-traumatic stress disorder.

149. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Audrey Epstein Reny**, the wife of Steven Alden Reny, and **Plaintiff Danielle Reny and Plaintiff Gillian Reny Nardella**, the children of Steven Alden Reny, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

150. On April 15, 2013, when the explosive devices described above were detonated, **Audrey Epstein Reny**, resident of and citizen of the United States, suffered severe and

permanent injuries, including shrapnel wounds to the lower right leg and loss of hearing, which have resulted in post-traumatic stress disorder.

151. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Steven Alden Reny**, the husband of Audrey Epstein Reny, and **Plaintiff Danielle Reny and Plaintiff Gillian Reny Nardella**, the children of Audrey Epstein Reny, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

152. On April 15, 2013, when the explosive devices described above were detonated, **Gillian Reny Nardella**, resident of and citizen of the United States, suffered severe and permanent injuries, including extensive burns and shrapnel wounds to both her lower extremities requiring extensive reconstructive surgery and years of ongoing surgical revisions on both legs to rectify bone, muscle, vascular and skin issues in addition to hearing loss, which have resulted in post-traumatic stress disorder.

153. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Steven Alden Reny**, the father of Gillian Reny Nardella, **Plaintiff Audrey Epstein Reny**, the mother of Gillian Reny Nardella, **Plaintiff Danielle Reny Larrow**, the sibling of Gillian Reny Nardella, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

154. On April 15, 2013, when the explosive devices described above were detonated, **Remy Justine Lawler**, resident of and citizen of the United States, suffered severe and

permanent injuries, including a shrapnel injury to her right leg requiring two surgeries and tinnitus, which have resulted in post-traumatic stress disorder.

155. On April 15, 2013, when the explosive devices described above were detonated, **Michelle L’Heureux**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel and open blast wounds to her left leg and left upper arm, nerve pain, ruptured eardrums, and hearing loss, which have resulted in post-traumatic stress disorder.

156. On April 15, 2013, when the explosive devices described above were detonated, **Brittany Loring**, resident of and citizen of the United States, suffered severe and permanent injuries, including a skull fracture and shrapnel wounds to the head, neck, and both legs, which have resulted in post-traumatic stress disorder.

157. On April 15, 2013, when the explosive devices described above were detonated, **Martin MacDonnell**, resident of and citizen of the United States, suffered severe and permanent injuries, including traumatic brain injury, ocular trauma, tinnitus, and loss of hearing, which have resulted in post-traumatic stress disorder.

158. On April 15, 2013, when the explosive devices described above were detonated, **Sarah MacKay**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds, nerve damage, and chronic pain, which have resulted in post-traumatic stress disorder.

159. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Keith MacKay**, the father of Sarah MacKay, **Plaintiff Donna MacKay**, the mother of Sarah MacKay, and **Plaintiff Katie Eisermann MacKay, Plaintiff Keith Mackay, Jr., and Plaintiff Kevin**

MacKay, the siblings of Sarah MacKay, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

160. On April 19, 2013, when the Tsarnaev brothers threw explosives and engaged in a shootout with police officers, **John MacLellan**, resident of and citizen of the United States, suffered severe and permanent injuries, including hearing loss, which has resulted in post-traumatic stress disorder.

161. On April 15, 2013, when the explosive devices described above were detonated, **Victoria McGrath**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds and nerve damage, which have resulted in post-traumatic stress disorder.

162. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff James McGrath**, the father of Victoria McGrath and **Plaintiff Jill McGrath**, the mother of Victoria McGrath, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

163. On April 15, 2013, when the explosive devices described above were detonated, **Karen McWatters**, resident of and citizen of the United States, suffered severe and permanent injuries, including the below knee amputation of her left leg, which has resulted in post-traumatic stress disorder.

164. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Andrew**

Rand and Plaintiff Stephen Rand II, the children of Karen McWatters, and **Plaintiff Daniel Engelhardt**, the sibling of Karen McWatters, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

165. On April 15, 2013, when the explosive devices described above were detonated, **Kaitlynn Milone**, resident of and citizen of the United States, suffered severe and permanent injuries, including the loss of her lower right calf that required a surgical implant, which has resulted in post-traumatic stress disorder.

166. On April 15, 2013, when the explosive devices described above were detonated, **Joseph “JP” Norden**, resident of and citizen of the United States, suffered severe and permanent injuries, including the below knee amputation of his right leg, injury to left thigh, blast burns, shrapnel wounds, and loss of hearing, which have resulted in post-traumatic stress disorder.

167. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Elizabeth Norden**, the mother of Joseph “JP” Norden, **Plaintiff Joseph Robert Norden**, the father of Joseph “JP” Norden, **Plaintiff Jonathan Norden**, **Plaintiff Caitlin Anne Norden**, **Plaintiff Colleen Kelli Norden**, and **Plaintiff Paul James Norden**, the siblings of Joseph “JP” Norden, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

168. On April 15, 2013, when the explosive devices described above were detonated, **Paul James Norden**, resident of and citizen of the United States, suffered severe and permanent injuries, including the above knee amputation of his right leg, third degree blast burns to the

stomach and second degree blast burns to the left leg, stomach, torso, both arms and hands, permanent right hand injury, loss of hearing, and shrapnel remaining in the body requiring ongoing surgeries, which have resulted in post-traumatic stress disorder.

169. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Elizabeth Norden**, the mother of Paul James Norden, **Plaintiff Joseph Robert Norden**, the father of Paul James Norden, **Plaintiff Jonathan Norden**, **Plaintiff Caitlin Anne Norden**, **Plaintiff Colleen Kelli Norden**, and **Plaintiff Joseph “JP” Norden**, the siblings of Paul James Norden, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

170. On April 15, 2013, when the explosive devices described above were detonated, **John Odom**, resident of and citizen of the United States, suffered severe and permanent injuries, including a shrapnel going through his left leg and embedding his right leg, a severed sciatic nerve and blood supply to his leg, loss of thirty percent of his hamstring, and permanent paralysis in his left leg from below the knee down, which have resulted in post-traumatic stress disorder.

171. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Karen Odom**, the wife of John Odom, and **Plaintiff Nicole Reis**, the child of John Odom, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

172. On April 15, 2013, when the explosive devices described above were detonated, **Jacob Reis**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder.

173. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Nicole Reis**, the mother of Jacob Reis, and **Plaintiff Matthew Reis**, the father of Jacob Reis, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

174. On April 15, 2013, when the explosive devices described above were detonated, **Matthew Reis**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder.

175. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Nicole Reis**, the wife of Matthew Reis, and **Plaintiff Jacob Reis**, the child of Matthew Reis, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

176. On April 15, 2013, when the explosive devices described above were detonated, **Nicole O'Neil**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder.

177. On April 15, 2013, when the explosive devices described above were detonated, **Amy O'Neill**, resident of and citizen of the United States, suffered severe and permanent

injuries, including shrapnel wounds, traumatic brain injury, and damage to teeth, which have resulted in post-traumatic stress disorder.

178. On April 15, 2013, when the explosive devices described above were detonated, **Caroline Reinsch**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to her right leg, which has resulted in post-traumatic stress disorder.

179. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Christian Williams**, the husband of Caroline Reinsch, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

180. On April 15, 2013, when the explosive devices described above were detonated, **Christian Williams**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to the legs and partial degloving of his right hand, which have resulted in post-traumatic stress disorder.

181. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Caroline Reinsch**, the wife of Christian Williams, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

182. On April 19, 2013, when the Tsarnaev brothers threw explosives and engaged in a shootout with police officers, **Joseph Reynolds**, resident of and citizen of the United States,

suffered severe and permanent injuries, including stomach and sleep complications resulting from post-traumatic stress disorder.

183. On April 15, 2013, when the explosive devices described above were detonated, eight-year-old **Martin Richard**, resident of and citizen of the United States, suffered fatal injuries.

184. Decedent, **Martin Richard**, from the time of injury to his death thereafter, suffered extreme bodily pain and suffering as a result of the actions described above which were undertaken by the agents of Defendants.

185. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Denise Richard**, the mother of Martin Richard, **Plaintiff William Richard**, the father of Martin Richard, and **Plaintiff Jane Richard and Plaintiff Henry Richard**, the siblings of Martin Richard, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

186. On April 15, 2013, when the explosive devices described above were detonated, **Jane Richard**, resident of and citizen of the United States, suffered severe and permanent injuries, including a below knee amputation, shrapnel wounds, blast burns, and loss of hearing, which have resulted in post-traumatic stress disorder.

187. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Denise Richard**, the mother of Jane Richard, **Plaintiff William Richard**, the father of Jane Richard,

and William Richard as personal representative of **Plaintiff the Estate of Martin Richard, and Plaintiff Henry Richard**, the siblings of Jane Richard, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

188. On April 15, 2013, when the explosive devices described above were detonated, **Denise Richard**, resident of and citizen of the United States, suffered severe and permanent injuries, including the loss of vision in her right eye, which have resulted in post-traumatic stress disorder.

189. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff William Richard**, the husband of Denise Richard, and William Richard as personal representative of **Plaintiff the Estate of Martin Richard, Plaintiff Jane Richard, and Plaintiff Henry Richard**, the children of Denise Richards, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

190. On April 15, 2013, when the explosive devices described above were detonated, **William Richard**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to his right leg and hearing loss in both ears, which have resulted in post-traumatic stress disorder.

191. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Denise Richard**, the wife of William Richard, and William Richard as personal representative of **Plaintiff the Estate of Martin Richard, Plaintiff Jane Richard, and Plaintiff Henry Richard**,

the children of William Richard, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

192. On April 15, 2013, when the explosive devices described above were detonated, **Laurie Scher**, resident of and citizen of the United States, suffered severe and permanent injuries, including loss of hearing, tinnitus, and hyperacusis, which have resulted in post-traumatic stress disorder.

193. On April 15, 2013, when the explosive devices described above were detonated, **Roseann Sdoia Materia**, resident of and citizen of the United States, suffered severe and permanent injuries, including the above knee amputation of her right leg, shrapnel wounds, blast burns, and loss of hearing, which have resulted in post-traumatic stress disorder.

194. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Eugene Sdoia**, the father of Roseann Sdoia Materia, **Plaintiff Rosemarie Buckley**, the mother of Roseann Sdoia Materia, **Plaintiff Michael Materia**, the husband of Roseann Sdoia Materia, and **Plaintiff Gia Buckley**, the sibling of Roseann Sdoia Materia, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

195. On April 15, 2013, when the explosive devices described above were detonated, **Shannon Silvestri**, resident of and citizen of the United States, suffered severe and permanent injuries, including hearing loss, which has resulted in post-traumatic stress disorder.

196. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kevin**

Silvestri, the husband of Shannon Silvestri and **Plaintiff Zachary Silvestri and Plaintiff Morgan Everton**, the children of Shannon Silvestri, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

197. On April 15, 2013, when the explosive devices described above were detonated, **Zachary Silvestri**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder.

198. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kevin Silvestri**, the father of Zachary Silvestri, **Plaintiff Shannon Silvestri**, the mother of Zachary Silvestri, and **Plaintiff Morgan Everton**, the sibling of Zachary Silvestri, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

199. On April 15, 2013, when the explosive devices described above were detonated, **Morgan Everton**, resident of and citizen of the United States, suffered severe and permanent injuries, including post-traumatic stress disorder.

200. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Kevin Silvestri**, the father of Morgan Everton, **Plaintiff Shannon Silvestri**, the mother of Morgan Everton, and **Plaintiff Zachary Silvestri**, the sibling of Morgan Everton, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

201. On April 19, 2013, when the Tsarnaev brothers threw explosives and engaged in a shootout with police officers, **Dennis “DJ” Simmonds**, resident of and citizen of the United States, suffered a fatal head injury in a blast caused by the bombs thrown at police officers, which resulted in his death one year later.

202. Decedent, **Dennis “DJ” Simmonds**, from the time of injury to his death thereafter, suffered extreme bodily pain and suffering as a result of the actions described above which were undertaken by the agents of Defendants.

203. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Dennis Simmonds**, the father of Dennis “DJ” Simmonds, **Plaintiff Roxanne Simmonds**, the mother of Dennis “DJ” Simmonds, and **Plaintiff Nicole Simmonds**, the sibling of Dennis “DJ” Simmonds, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

204. On April 15, 2013, when the explosive devices described above were detonated, **Lauren Snickenberger**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to the face and body, blast burns, and hearing loss, which have resulted in post-traumatic stress disorder.

205. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Mark Snickenberger**, the husband of Lauren Snickenberger, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

206. On April 15, 2013, when the explosive devices described above were detonated, **Mark Snickenberger**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds and sensory issues, which have resulted in post-traumatic stress disorder.

207. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Lauren Snickenberger**, the wife of Mark Snickenberger, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

208. On April 15, 2013, when the explosive devices described above were detonated, **Elizabeth Sobiech**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to her abdomen and hand, and injury to her eye, which have resulted in post-traumatic stress disorder.

209. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Peter Sobiech**, the husband of Elizabeth Sobiech, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

210. On April 15, 2013, when the explosive devices described above were detonated, **Eliza Tierney**, resident of and citizen of the United States, suffered severe and permanent injuries, including permanent hearing loss in the right ear, tinnitus, shrapnel wounds on her hand, and blast burns on her scalp and ankle, which have resulted in post-traumatic stress disorder.

211. On April 15, 2013, when the explosive devices described above were detonated, **Mildred Valverde**, resident of and citizen of the United States, suffered severe and permanent injuries, including loss of hearing, fibromyalgia, and arthritis in her toes, fingers, neck, and left hip, which have resulted in post-traumatic stress disorder.

212. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Michael Mesfin**, the child of Mildred Valverde, and **Plaintiff Sara Valverde Perez**, the sibling of Mildred Valverde, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

213. On April 15, 2013, when the explosive devices described above were detonated, **Sara Valverde Perez**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds in both legs resulting in nerve damage to the left leg, fibromyalgia, chronic fatigue, and loss of hearing, which have resulted in post-traumatic stress disorder.

214. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Joselyn Perez**, the child of Sara Valverde Perez, and **Plaintiff Mildred Valverde**, the sibling of Sara Valverde Perez, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

215. On April 15, 2013, when the explosive devices described above were detonated, **Joselyn Perez**, resident of and citizen of the United States, suffered severe and permanent

injuries, including shrapnel wounds in her legs and loss of hearing, which have resulted in post-traumatic stress disorder.

216. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Sara Valverde Perez**, the mother of Joselyn Perez, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

217. On April 15, 2013, when the explosive devices described above were detonated, **Rebekah Varney**, resident of and citizen of the United States, suffered severe and permanent injuries, including the amputation of her left leg, shrapnel wounds, blast burns, damage to teeth, and loss of hearing, which have resulted in post-traumatic stress disorder.

218. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Timothy Gregory**, the father of Rebekah Varney, **Plaintiff Tina Gregory**, the mother of Rebekah Varney, and **Plaintiff Noah Varney**, the child of Rebekah Varney, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

219. On April 15, 2013, when the explosive devices described above were detonated, **Noah Varney**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds, which have resulted in post-traumatic stress disorder.

220. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran

including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Rebekah Varney**, the mother of Noah Varney, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

221. On April 15, 2013, when the explosive devices described above were detonated, **Michael Ward**, resident of and citizen of the United States, suffered severe and permanent injuries, including depression and post-traumatic stress disorder.

222. On April 15, 2013, when the explosive devices described above were detonated, **Alissa Ward**, resident of and citizen of the United States, suffered severe and permanent injuries, including loss of hearing in the right ear, which has resulted in post-traumatic stress disorder.

223. On April 15, 2013, when the explosive devices described above were detonated, **Jacqui Webb**, resident of and citizen of the United States, suffered severe and permanent injuries, including hearing loss in the right ear; tendon/muscle damage in the right hand; third degree burns on the right calf, thigh and flank; second degree burns on both legs, stomach, torso, back, hands; and shrapnel remaining in body requiring ongoing surgeries, which have resulted in post-traumatic stress disorder.

224. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Barbara Webb**, the mother of Jacqui Webb, and **Plaintiff Kristin Loehning, Plaintiff Janel Webb, and Plaintiff David Pietrantonio**, the siblings of Jacqui Webb, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

225. On April 15, 2013, when the explosive devices described above were detonated, **Dr. Scott Ross Weisberg**, resident of and citizen of the United States, suffered severe and permanent injuries, including traumatic brain injury, tinnitus, hyperacusis, and loss of hearing requiring two ear surgeries, which have resulted in post-traumatic stress disorder.

226. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Ilene Weisberg**, the mother of Dr. Scott Ross Weisberg, and **Plaintiff Joshua Weisberg and Jessica Weisberg**, the children of Dr. Scott Ross Weisberg, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

227. On April 15, 2013, when the explosive devices described above were detonated, **Eric Taylor Whalley**, resident of and citizen of the United States, suffered severe and permanent injuries, including traumatic brain injury with hemorrhage and hematoma, loss of vision in his right eye, blast burns, leg fracture, and loss of hearing, which have resulted in post-traumatic stress disorder.

228. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Ann Whalley**, the wife of Eric Taylor Whalley, and **Plaintiff Christopher Whalley and Plaintiff Richard Taylor Whalley**, the children of Eric Taylor Whalley, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

229. On April 15, 2013, when the explosive devices described above were detonated, **Ann Whalley**, resident of and citizen of the United States, suffered severe and permanent

injuries, including blast burns, shrapnel wounds, lower limb fractures, and loss of hearing, which have resulted in post-traumatic stress disorder.

230. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Eric Taylor Whalley**, the husband of Ann Whalley, and **Plaintiff Christopher Whalley and Plaintiff Richard Taylor Whalley**, the children of Ann Whalley, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

231. On April 15, 2013, when the explosive devices described above were detonated, **Robert Wheeler**, resident of and citizen of the United States, suffered severe and permanent injuries, including hearing loss, which has resulted in post-traumatic stress disorder.

232. On April 15, 2013, when the explosive devices described above were detonated, **Mary Jo White**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds to the left side of her body and a broken left hand, which have resulted in post-traumatic stress disorder.

233. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, Mary Jo White as personal representative of **Plaintiff the Estate of William White**, the husband of Mary Jo White, and Andrew White as personal representative of **Plaintiff the Estate of Kevin White and Plaintiff Andrew White**, the children of Mary Jo White, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

234. On April 15, 2013, when the explosive devices described above were detonated, **William White**, resident of and citizen of the United States, suffered severe and permanent injuries, including the above knee amputation of his right leg and shrapnel wounds throughout his body, which have resulted in post-traumatic stress disorder.

235. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Mary Jo White**, the wife of William White, and Andrew White as personal representative of **Plaintiff the Estate of Kevin White and Plaintiff Andrew White**, the children of William White, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

236. On April 15, 2013, when the explosive devices described above were detonated, **Kevin White**, resident of and citizen of the United States, suffered severe and permanent injuries, including shrapnel wounds in both legs and left arm and a seizure, which have resulted in post-traumatic stress disorder.

237. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Mary Jo White**, the mother of Kevin White, Mary Jo White as personal representative of **Plaintiff the Estate of William White**, the father of Kevin White, and **Plaintiff Andrew White**, the sibling of Kevin White, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

238. On April 15, 2013, when the explosive devices described above were detonated, **Linda Witt**, resident of and citizen of the United States, suffered severe and permanent injuries, including loss of hearing and damage to teeth, which have resulted in post-traumatic stress disorder.

239. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Dan Witt**, the husband of Linda Witt, and **Plaintiff William Tanguay**, the child of Linda Witt, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

240. On April 15, 2013, when the explosive devices described above were detonated, **Steve Woolfenden**, resident of and citizen of the United States, suffered severe and permanent injuries, including the below knee amputation of his left leg, loss of hearing, tinnitus, and shrapnel wounds, which have resulted in post-traumatic stress disorder.

241. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Amber Woolfenden**, the wife of Steve Woolfenden and **Plaintiff Leo Woolfenden**, the child of Steve Woolfenden, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

242. On April 15, 2013, when the explosive devices described above were detonated, **Leo Woolfenden**, resident of and citizen of the United States, suffered severe and permanent

injuries, including skull fracture, concussion, and ruptured ear drums, which have resulted in post-traumatic stress disorder.

243. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Amber Woolfenden**, the mother of Leo Woolfenden, and **Plaintiff Steven Woolfenden**, the father of Leo Woolfenden, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

244. On April 15, 2013, when the explosive devices described above were detonated, **David Enrique Yopez**, resident of and citizen of the United States, suffered severe and permanent injuries, including second- and third-degree burns, shrapnel wounds in his legs requiring surgical removal, ruptured eardrums, and tinnitus, which have resulted in post-traumatic stress disorder.

245. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Gisela Ana Lucia Yopez** as the mother of David Yopez, **Plaintiff Luis Enrique Yopez** as the father of David Yopez, and **Plaintiff Andrea Cristina Yopez** as the sibling of David Yopez, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

246. On April 15, 2013, when the explosive devices described above were detonated, **Gisela Ana Lucia Yopez**, resident of and citizen of the United States, suffered severe and permanent injuries, including depression and post-traumatic stress disorder.

247. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Luis Enrique Yepez** as the husband of Gisela Ana Lucia Yepez and **Plaintiff David Enrique Yepez and Plaintiff Andrea Cristina Yepez** as the children of Gisela Ana Lucia Yepez, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

248. On April 15, 2013, when the explosive devices described above were detonated, **Luis Enrique Yepez**, resident of and citizen of the United States, suffered severe and permanent injuries, including depression and post-traumatic stress disorder.

249. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were materially supported by the Islamic Republic of Iran including through its agency, the Iranian Ministry of Intelligence and Security, **Plaintiff Gisele Ana Lucia Yepez** as the wife of Luis Enrique Yepez, **Plaintiff David Enrique Yepez and Plaintiff Andrea Cristina Yepez**, as the children of Luis Enrique Yepez, endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

VI. CLAIMS

COUNT I **WRONGFUL DEATH** **PURSUANT TO 28 U.S.C. § 1605A**

250. Krystle Campbell, Sean Collier, Martin Richard, and Dennis “DJ” Simmonds suffered fatal injuries caused by the April 15, 2013 Boston Marathon bombing and related actions.

251. The deaths of these Americans were caused by willful and deliberate acts of extra-judicial killing perpetrated by Defendants.

252. Defendants, including through their agents, rendered material support and resources in connection with acts that resulted in the deaths of the aforementioned Americans. Those agents were at all times acting within the scope of their agency and acted on the direction of Defendants, the Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security.

253. Wherefore, the respective representatives of the estates demand judgment, jointly and severally, against Defendants, The Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security.

COUNT II
SURVIVAL CLAIM
PURSUANT TO 28 U.S.C. § 1605A

254. Decedents Krystle Campbell, Sean Collier, Martin Richard, and Dennis “DJ” Simmonds, from the time of injury to their deaths thereafter, suffered extreme bodily pain and suffering as a result of the actions described above which were undertaken by the agents of Defendants.

255. Wherefore, the aforementioned individuals, and their representatives, demand judgment against Defendants, the Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security, jointly and severally.

COUNT III
INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS
BY IMMEDIATE RELATIVES OF DECEASED VICTIMS
PURSUANT TO 28 U.S.C. § 1605A

256. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff the Estate of

William Campbell, Jr. as the father of Krystle Campbell; Plaintiff Patricia Campbell as the mother of Krystle Campbell; and Plaintiff William A. Campbell (III) as the sibling of Krystle Campbell, have endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

257. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Kelley Rogers as the mother of Sean Collier; Plaintiff Joseph Rogers as the stepfather of Sean Collier; Plaintiff Andrew Collier, Plaintiff Nicole Lynch, and Plaintiff Jennifer Lemmerman as the siblings of Sean Collier; and Plaintiff Jennifer Rogers and Plaintiff Robert Rogers as the stepsiblings of Sean Collier, have endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

258. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Denise Richard as the mother of Martin Richard; Plaintiff William Richard as the father of Martin Richard; and Plaintiff Jane Richard and Plaintiff Henry Richard as the siblings of Martin Richard, have endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

259. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Dennis Simmonds as the father of Dennis “DJ” Simmonds; Plaintiff Roxanne Simmonds as the mother of Dennis

“DJ” Simmonds; and Plaintiff Nicole Simmonds as the sibling of Dennis “DJ” Simmonds, have endured extreme mental anguish and pain and suffering and economic losses, and suffered emotional injury and loss.

260. Wherefore, the aforementioned individuals demand judgment against Defendants, the Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security, jointly and severally, for each.

COUNT IV
BATTERY
PURSUANT TO 28 U.S.C. § 1605A

261. By use of an explosive device as described above, the Tsarnaev brothers willfully, violently and forcefully battered and did violence to the bodies of Plaintiffs Heather Abbott, Melida Arredondo, Alexander Redondo, Jeffrey Michael Bauman, Elizabeth Bermingham, Ronald Brassard, Karen Brassard, Krystara Nadeau, Elena Flores-Breese, Steven Byrne, Jean Campbell, Mitchell Campbell, Jarrod Clowery, Michelle Connolly, Richard Cordero, Celeste Anne Corcoran, Sydney Corcoran, Lynn Crisci, Adrienne Davis, Sabrina Dello Russo, Richard Donohue, Patrick Downes, Allison Elliott, Annette Emerson, Agnes Flaherty, Alison Flaherty, Leo Manuel Fonseca, Jr., Marc Fucarile, Alvaro Galvis, Martha Galvis, Sarah Girouard, Michael Gross, Nicole Gross, Erika Moon, John Hamacher, Aaron Hern, Frank Douglas Julian, Jennifer Kauffman, Jessica Kensky, Colton Kilgore, Kimberly Kilgore, Gina DiMartino, Peter Vincent DiMartino, Kyle Raymond Larrow, Danielle Reny Larrow, Steven Alden Reny, Audrey Epstein Reny, Gillian Reny Nardella, Remy Justine Lawler, Michelle L’Heureux, Brittany Loring, Martin MacDonnell, Sarah MacKay, John MacLellan, the Estate of Victoria McGrath, Karen McWatters, Kaitlynn Milone, Joseph “JP” Norden, Paul James Norden, John Odom, Amy O’Neill, Caroline Reinsch, Christian Williams, Jane Richard, Denise Richard, William Richard,

Laurie Scher, Roseann Sdoia Materia, Shannon Silvestri, Lauren Snickenberger, Mark Snickenberger, Elizabeth Sobiech, Eliza Tierney, Mildred Valverde, Sara Valverde Perez, Joselyn Perez, Rebekah Varney, Noah Varney, Alissa Ward, Jacqui Webb, Dr. Scott Ross Weisberg, Eric Taylor Whalley, Ann Whalley, Robert Wheeler, the Estate of William White, Mary Jo White, the Estate of Kevin White, Linda Witt, Steven Woolfenden, Leo Woolfenden, and David Enrique Yopez inflicting injuries upon him resulting in pain and suffering and economic losses.

262. The willful, wrongful and intentional acts of the Tsarnaev Brothers were funded and directed by the Islamic Republic of Iran through its agent, the Iranian Ministry of Intelligence and Security, and constituted a battery upon the aforementioned individuals.

263. Wherefore, the aforementioned individuals demand judgment against Defendants, the Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security, jointly and severally.

COUNT V
ASSAULT
PURSUANT TO 28 U.S.C. § 1605A

264. The Tsarnaev brothers, as above alleged, intentionally and willfully placed Plaintiffs Heather Abbott, Melida Arredondo, Alexander Redondo, Jeffrey Michael Bauman, Elizabeth Bermingham, Ronald Brassard, Karen Brassard, Krystara Nadeau, Elena Flores-Breese, Steven Byrne, Jean Campbell, Mitchell Campbell, Christopher Campbell, Trevor Campbell, Corey Campbell, Manya Chylinski, Jarrod Clowery, Michelle Connolly, Richard Cordero, Celeste Anne Corcoran, Sydney Corcoran, Lynn Crisci, Kristin Curry, Adrienne Davis, Sabrina Dello Russo, Richard Donohue, Patrick Downes, Allison Elliott, Annette Emerson, Agnes Flaherty, Alison Flaherty, Leo Manuel Fonseca, Jr., Marc Fucarile, Alvaro Galvis, Martha

Galvis, Sarah Girouard, Michael Gross, Nicole Gross, Erika Moon, Carol Downing, John Hamacher, Aaron Hern, Frank Douglas Julian, Katherine Hern, Jennifer Kauffman, Jessica Kensky, Colton Kilgore, Kimberly Kilgore, Gina DiMartino, Peter Vincent DiMartino, Kyle Raymond Larrow, Danielle Reny Larrow, Steven Alden Reny, Audrey Epstein Reny, Gillian Reny Nardella, Remy Justine Lawler, Michelle L’Heureux, Brittany Loring, Martin MacDonnell, Sarah MacKay, John MacLellan, the Estate of Victoria McGrath, Karen McWatters, Kaitlynn Milone, Joseph “JP” Norden, Paul James Norden, John Odom, Jacob Reis, Matthew Reis, Amy O’Neill, Nicole O’Neil, Caroline Reinsch, Christian Williams, Joseph Reynolds, Jane Richard, Denise Richard, William Richard, Laurie Scher, Roseann Sdoia Materia, Shannon Silvestri, Zachary Silvestri, Morgan Everton, Lauren Snickenberger, Mark Snickenberger, Elizabeth Sobiech, Eliza Tierney, Mildred Valverde, Sara Valverde Perez, Joselyn Perez, Rebekah Varney, Noah Varney, Michael Ward, Alissa Ward, Jacqui Webb, Dr. Scott Ross Weisberg, Eric Taylor Whalley, Ann Whalley, Robert Wheeler, the Estate of William White, Mary Jo White, the Estate of Kevin White, Linda Witt, Steven Woolfenden, Leo Woolfenden, David Enrique Yepez, Gisela Ana Lucia Yepez, and Luis Enrique Yepez in fear and apprehension of harm as a direct result of their actions.

265. The willful, wrongful and intentional acts of the Tsarnaev Brothers were funded and directed by the Islamic Republic of Iran through its agent, the Iranian Ministry of Intelligence and Security, and constituted a battery upon the aforementioned individual.

266. Wherefore, the aforementioned individuals demand judgment against Defendants, the Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security, jointly and severally.

COUNT VI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

BY SURVIVING VICTIMS
PURSUANT TO 28 U.S.C. § 1605A

267. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers who acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiffs Heather Abbott, Melida Arredondo, Alexander Redondo, Jeffrey Michael Bauman, Elizabeth Bermingham, Ronald Brassard, Karen Brassard, Krystara Nadeau, Elena Flores-Breese, Steven Byrne, Jean Campbell, Mitchell Campbell, Christopher Campbell, Trevor Campbell, Corey Campbell, Manya Chylinski, Jarrod Clowery, Michelle Connolly, Richard Cordero, Celeste Anne Corcoran, Sydney Corcoran, Lynn Crisci, Kristin Curry, Adrianne Davis, Sabrina Dello Russo, Richard Donohue, Patrick Downes, Allison Elliott, Annette Emerson, Agnes Flaherty, Alison Flaherty, Leo Manuel Fonseca, Jr., Marc Fucarile, Alvaro Galvis, Martha Galvis, Sarah Girouard, Michael Gross, Nicole Gross, Erika Moon, Carol Downing, John Hamacher, Aaron Hern, Katherine Hern, Frank Douglas Julian, Jennifer Kauffman, Jessica Kensky, Colton Kilgore, Kimberly Kilgore, Gina DiMartino, Peter Vincent DiMartino, Kyle Raymond Larrow, Danielle Reny Larrow, Steven Alden Reny, Audrey Epstein Reny, Gillian Reny Nardella, Remy Justine Lawler, Michelle L’Heureux, Brittany Loring, Martin MacDonnell, Sarah MacKay, John MacLellan, the Estate of Victoria McGrath, Karen McWatters, Kaitlynn Milone, Joseph “JP” Norden, Paul James Norden, John Odom, Jacob Reis, Matthew Reis, Amy O’Neill, Nicole O’Neil, Caroline Reinsch, Christian Williams, Joseph Reynolds, Jane Richard, Denise Richard, William Richard, Laurie Scher, Roseann Sdoia Materia, Shannon Silvestri, Zachary Silvestri, Morgan Everton, Lauren Snickenberger, Mark Snickenberger, Elizabeth Sobiech, Eliza Tierney, Mildred Valverde, Sara Valverde Perez, Joselyn Perez, Rebekah Varney, Noah Varney, Michael Ward, Alissa Ward, Jacqui Webb, Dr. Scott Ross Weisberg, Eric Taylor Whalley, Ann Whalley, Robert Wheeler, the

Estate of William White, Mary Jo White, the Estate of Kevin White, Linda Witt, Steven Woolfenden, Leo Woolfenden, David Enrique Yepez, Gisela Ana Lucia Yepez, and Luis Enrique Yepez have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

268. Wherefore, the aforementioned individuals demand judgment against Defendants, the Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security, jointly and severally.

COUNT VII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
BY IMMEDIATE RELATIVES OF SURVIVING VICTIMS
PURSUANT TO 28 U.S.C. § 1605A

269. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Rosemary Abbott, as the mother of Heather Abbott and Plaintiff Dale Abbott as the father of Heather Abbott, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

270. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Melida Arredondo as the wife of Alexander Redondo and Plaintiff Alexander Redondo as the husband of Melida Arredondo, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

271. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Patricia Marie

Bauman as the mother of Jeffrey Michael Bauman; Plaintiff Jeffrey Alan Bauman as the father of Michael Bauman; Plaintiff Csilla Rosemary Bauman as the stepmother of Jeffrey Michael Bauman; and Plaintiff Christopher Joseph Bauman as the sibling of Jeffrey Michael Bauman, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

272. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Ronald Brassard, as the husband of Karen Brassard; Plaintiff Ronald Brassard as the father of Krystara Nadeau; Plaintiff Karen Brassard as the wife of Ronald Brassard; Plaintiff Karen Brassard as the mother of Krystara Nadeau; and Plaintiff Krystara Nadeau as the child of Ronald Brassard and Karen Brassard, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

273. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Kathy Byrne as the mother of Steven Byrne; Plaintiff Charles Byrne as the father of Steven Byrne; and Plaintiff Kristi Mietzner as the sibling of Steven Byrne, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

274. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Jean Campbell as the mother of Mitchell Campbell, Trevor Campbell, and Corey Campbell; Plaintiff Jean

Campbell as the wife of Christopher Campbell; Plaintiff Christopher Campbell as the husband of Jean Campbell; Plaintiff Christopher Campbell as the father of Mitchell Campbell, Trevor Campbell, and Corey Campbell; Plaintiff Christopher Campbell, Plaintiff Mitchell Campbell, and Plaintiff Corey Campbell as the children of Jean Campbell and Christopher Campbell; Plaintiff Mitchell Campbell as the sibling of Trevor Campbell and Corey Campbell; Plaintiff Trevor Campbell as the sibling of Mitchell Campbell and Corey Campbell; and Plaintiff Corey Campbell as the sibling of Mitchell Campbell and Trevor Campbell, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

275. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Celeste Anne Corcoran as the mother of Sydney Corcoran; Plaintiff Sydney Corcoran and Plaintiff Tyler Corcoran as the children of Celeste Anne Corcoran; and Plaintiff Tyler Corcoran as the sibling of Sydney Corcoran, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

276. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Roberta Cordero as the wife of Richard Cordero, has endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

277. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff James A. Costello

as the father of James J. Costello and Plaintiff Margaret Costello as the mother of James J. Costello, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

278. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Maria Dello Russo as the mother of Sabrina Dello Russo; Plaintiff Robert Dello Russo as the father of Sabrina Dello Russo; and Plaintiff Robert Bernardo Dello Russo as the sibling of Sabrina Dello Russo, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

279. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Kimberly Donohue as the wife of Richard Donohue, has endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

280. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Deborah Downes as the mother of Patrick Downes; Plaintiff Brian Downes as the father of Patrick Downes; Plaintiff Jessica Kensky as the wife of Patrick Downes; and Plaintiff Brendan Downes as the sibling of Patrick Downes, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

281. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran

through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Agnes Flaherty as the mother of Alison Flaherty and Plaintiff Alison Flaherty as the child of Agnes Flaherty, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

282. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Edward Fucarile, Sr. as the father of Marc Fucarile; Plaintiff Andrea Fucarile as the stepmother of Marc Fucarile; Plaintiff Maureen Fucarile as the mother of Marc Fucarile; and Plaintiff Stephanie Baron and Plaintiff Edward Fucarile, Jr. as the siblings of Marc Fucarile, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

283. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Alvaro Galvis as the husband of Martha Galvis; Plaintiff Martha Galvis as the wife of Alvaro Galvis; Plaintiff Martha Fusero, Plaintiff Leonardo Galvis, and Plaintiff Erika Farkas as the children of Alvaro Galvis; and Plaintiff Martha Fusero, Plaintiff Leonardo Galvis, and Plaintiff Erika Farkas as the children of Martha Galvis, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

284. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Christopher Girouard as the father of Sarah Girouard and Plaintiff Susan Girouard as the mother of Sarah

Girouard, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

285. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Michael Gross as the husband of Nicole Gross; Plaintiff Nicole Gross as the wife of Michael Gross; Plaintiff Nicole Gross as the sibling of Erika Moon; Plaintiff Erika Moon as the sibling of Nicole Gross; Plaintiff Nicole Gross and Plaintiff Erika Moon as the children of Carol Downing; and Plaintiff Carol Downing as the mother of Nicole Gross and Erika Moon, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

286. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Alan Hern as the father of Aaron Hern; Plaintiff Katherine Hern as the mother of Aaron Hern; Plaintiff Abigail Hern as the sibling of Aaron Hern; Plaintiff Alan Hern as the husband of Katherine Hern; and Plaintiff Aaron Hern and Plaintiff Abigail Hern as the children of Katherine Hern, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

287. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff the Estate of Herman Kensky as the father of Jessica Kensky; Plaintiff Mary Katherine Kensky as the mother of Jessica Kensky; Plaintiff Patrick Downes as the husband of Jessica Kensky; and Plaintiff

Sarah Wright as the sibling of Jessica Kensky, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

288. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Colton Kilgore as the husband of Kimberly Kilgore and Plaintiff Kimberly Kilgore as the wife of Colton Kilgore, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

289. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Kimberly Kilgore as the sibling of Gina DiMartino and Peter Vincent DiMartino; Plaintiff Gina DiMartino as the sibling of Kimberly Kilgore and Peter Vincent DiMartino; and Plaintiff Peter Vincent DiMartino as the sibling of Kimberly Kilgore and Gina DiMartino, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

290. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Steven Alden Reny as the husband of Audrey Epstein Reny; Plaintiff Steven Alden Reny as the father of Danielle Reny Larrow and Gillian Reny Nardella; Plaintiff Audrey Epstein Reny as the wife of Steven Alden Reny; Plaintiff Audrey Epstein Reny as the mother of Danielle Reny Larrow and Gillian Reny Nardella; Plaintiff Danielle Reny Larrow as the child of Steven Alden Reny and Audrey Epstein Reny; Plaintiff Danielle Reny Larrow as the sibling of Gillian Reny Nardella;

Plaintiff Gillian Reny Nardella as the child of Steven Alden Reny and Audrey Epstein Reny; and Plaintiff Gillian Reny Nardella as the sibling of Danielle Reny Larrow, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

291. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Keith MacKay as the father of Sarah MacKay, Plaintiff Donna MacKay as the mother of Sarah MacKay, and Plaintiff Katie Eisermann MacKay, Plaintiff Keith MacKay, Jr., and Plaintiff Kevin MacKay as the siblings of Sarah MacKay, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

292. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff James McGrath as the father of Victoria McGrath and Plaintiff Jill McGrath as the mother of Victoria McGrath, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

293. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Andrew Rand and Stephen Rand II as the children of Karen McWatters and Plaintiff Daniel Engelhardt as the sibling of Karen McWatters, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

294. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Elizabeth Norden as the mother of Joseph “JP” Norden and Paul James Norden; Plaintiff Joseph Robert Norden, as the father of Joseph “JP” Norden and Paul James Norden; Plaintiff Jonathan Norden, Plaintiff Caitlin Anne Norden, Plaintiff Colleen Kelli Norden, and Plaintiff Paul James Norden as the siblings of Joseph “JP” Norden; and Plaintiff Jonathan Norden, Plaintiff Caitlin Anne Norden, Plaintiff Colleen Kelli Norden, and Plaintiff Joseph “JP” Norden as the siblings of Paul James Norden, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

295. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Karen Odom as the wife of John Odom, and Plaintiff Nicole Reis as the child of John Odom, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

296. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Nicole Reis as the mother of Jacob Reis; Plaintiff Nicole Reis as the wife of Matthew Reis; Plaintiff Matthew Reis as the father of Jacob Reis; and Plaintiff Jacob Reis as the child of Matthew Reis, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

297. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran

through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Caroline Reinsch as the wife of Christian Williams and Plaintiff Christian Williams as the husband of Caroline Reinsch, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

298. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Denise Richard as the mother of Jane Richard; Plaintiff Denise Richard as the wife of William Richard; Plaintiff William Richard as the father of Jane Richard; Plaintiff William Richard as the husband of Denise Richard; Plaintiff Jane Richard as the child of Denise Richard and William Richard; Plaintiff Henry Richard as the sibling of Jane Richard; and Plaintiff Henry Richard as the child of Denise Richard and William Richard, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

299. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Eugene Sdoia as the father of Roseann Sdoia Materia; Plaintiff Rosemarie Buckley as the mother of Roseann Sdoia Materia; Michael Materia as the husband of Roseann Sdoia Materia; and Plaintiff Gia Buckley as the sibling of Roseann Sdoia Materia, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

300. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Shannon Silvestri

as the mother of Zachary Silvestri and Morgan Everton; Plaintiff Kevin Silvestri as the father of Zachary Silvestri and Morgan Everton; Plaintiff Kevin Silvestri as the husband of Shannon Silvestri; Plaintiff Zachary Silvestri and Plaintiff Morgan Everton as the children of Shannon Silvestri; Plaintiff Zachary Silvestri as the sibling of Morgan Everton; and Plaintiff Morgan Everton as the sibling of Zachary Silvestri, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

301. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Lauren Snickenberger as the wife of Mark Snickenberger and Plaintiff Mark Snickenberger as the husband of Lauren Snickenberger, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

302. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Peter Sobiech as the husband of Elizabeth Sobiech, has endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

303. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Michael Mesfin as the child of Mildred Valverde; Plaintiff Sara Valverde Perez as the sibling of Mildred Valverde; Plaintiff Mildred Valverde as the sibling of Sara Valverde Perez; Plaintiff Joselyn Perez as the child of Sara Valverde Perez; and Plaintiff Sara Valverde Perez as the mother of Joselyn Perez,

have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

304. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Timothy Gregory as the father of Rebekah Varney; Plaintiff Tina Gregory as the mother of Rebekah Varney; Plaintiff Noah Varney as the child of Rebekah Varney; and Plaintiff Rebekah Varney as the mother of Noah Varney, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

305. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Barbara Webb as the mother of Jacqui Webb and Plaintiff Kristin Loehning, Plaintiff Janel Webb, and Plaintiff David Pietrantonio as the siblings of Jacqui Webb, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

306. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Ilene Weisberg as the mother of Dr. Scott Ross Weisberg, and Plaintiff Joshua Weisberg and Plaintiff Jessica Weisberg as the children of Dr. Scott Ross Weisberg, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

307. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran

through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Ann Whalley as the wife of Eric Taylor Whalley; Plaintiff Christopher Whalley and Plaintiff Richard Whalley as the children of Eric Taylor Whalley; Plaintiff Eric Taylor Whalley as the husband of Ann Whalley; and Plaintiff Christopher Whalley and Plaintiff Richard Whalley as the children of Ann Whalley, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

308. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff the Estate of William White as the husband of Mary Jo White; Plaintiff the Estate of William White as the father of Kevin White; Plaintiff Mary Jo White as the wife of William White; Plaintiff Mary Jo White as the mother of Kevin White; Plaintiff the Estate of Kevin White and Plaintiff Andrew White as the children of Mary Jo White; Plaintiff the Estate of Kevin White and Plaintiff Andrew White as the children of William White; and Plaintiff Andrew White as the sibling of Kevin White, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

309. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Dan Witt as the husband of Linda Witt and Plaintiff William Tanguay as the child of Linda Witt, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

310. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran

through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff Steve Woolfenden as the father of Leo Woolfenden; Plaintiff Amber Woolfenden as the mother of Leo Wolfenden; Plaintiff Amber Woolfenden as the wife of Steve Woolfenden; and Plaintiff Leo Wolfenden as the child of Steve Woolfenden, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

311. As a direct and proximate result of the willful, wrongful and intentional acts of the Tsarnaev brothers, whose acts were funded and directed by the Islamic Republic of Iran through its agency, the Iranian Ministry of Intelligence and Security, Plaintiff David Enrique Yepez and Plaintiff Andrea Cristina Yepez as the children of Gisela Ana Lucia Yepez; Plaintiff David Enrique Yepez and Plaintiff Andrea Cristina Yepez as the children of Luis Enrique Yepez; Plaintiff Gisela Ana Lucia Yepez as the wife of Luis Enrique Yepez; Plaintiff Gisela Ana Lucia Yepez as the mother of David Enrique Yepez; Plaintiff Luis Enrique Yepez as the husband of Gisela Ana Lucia Yepez; Plaintiff Luis Enrique Yepez as the father of David Enrique Yepez; and Plaintiff Andrea Cristina Yepez as the sibling of David Enrique Yepez, have endured extreme mental anguish and pain and suffering, and suffered emotional injury and loss.

312. Wherefore, the aforementioned individuals demand judgment against Defendants, the Islamic Republic of Iran and the Iranian Ministry of Intelligence and Security, jointly and severally.

COUNT VIII
RECOVERY FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES
PURSUANT TO 28 U.S.C. § 1605B (JASTA)

313. Plaintiffs reallege and incorporate by reference every allegation set forth as if fully set forth herein.

314. This action is also brought pursuant to 28 U.S.C. § 1605B of the Foreign Sovereign Immunities Act known as JASTA and 18 U.S.C. § 2333(a) for the injuries and deaths suffered by U.S. nationals in the Boston Marathon Bombings.

315. Those attacks constituted acts of international terrorism pursuant to JASTA and 18 U.S.C. §2331 that violated federal and state laws against murder and assault, including but not limited to 18 U.S.C. § 2332b (prohibiting terrorist acts of maiming, assault, and murder), and at the time those acts were committed, planned and authorized, Al-Qaeda and AQAP were designated as a Foreign Terrorist Organization under section 219 of the Immigration and Nationality Act, 8 U.S.C. § 1189.

316. Pursuant to 18 U.S.C. § 2333(a), (d), Iran aided and abetted Al-Qaeda and/or AQAP through numerous acts detailed herein by knowingly providing it with substantial assistance to prepare and carry out an act or acts of international terrorism.

317. Pursuant to 18 U.S.C. § 2333(a), (d), Iran conspired with Al-Qaeda 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 Al-Qaeda to prepare and carry out an act or acts of international terrorism.

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

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

- 18 U.S.C. § 2332 – Conspiring to attempt to kill or kill a U.S. national;
- 18 U.S.C. § 2332a – Conspiring to use a weapon of mass destruction;
- 18 U.S.C. § 2332b – Conspiring to commit an act of terrorism;
- 18 U.S.C. § 2339A – Providing material support to terrorists;
- 18 U.S.C. § 2339B – Providing material support or resources to designated foreign terrorist organizations;
- 18 U.S.C. §2339 C – Prohibitions against the financing of terrorism;
- Mass. Gen. Laws ch. 274, §2 – Accessory or aiding in the commission of a felony

319. Iran’s conduct amounted to a violation of 18 U.S.C. § 2(a) because Iran intentionally aided, abetted and counseled the commission of a criminal act or acts of international terrorism by Al-Qaeda and/or AQAP, by providing the terrorist organization with material support, resources and funding with the knowledge that Al-Qaeda and/or AQAP would use such assistance to prepare for and commit such a criminal act or acts.

320. Iran’s conduct amounted to a violation of 18 U.S.C. § 371 because it conspired with Al-Qaeda 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 Al-Qaeda to prepare for and carry out a criminal act or acts of international terrorism.

321. Iran’s conduct amounted to a violation of 18 U.S.C. § 2339A in that on and prior to the Boston Marathon Bombings, it provided material support or resources for Al-Qaeda and/or conspired with Al-Qaeda and others to provide material support or resources for Al-Qaeda and/or AQAP, 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 assault and murder)

322. Iran's conduct amounted to a violation of 18 U.S.C. § 2339A in that on and prior to the Boston Marathon Bombings, it concealed or disguised the nature, location, source, or ownership of Al-Qaeda's material support or resources and/or conspired with Iran's intelligence apparatus, military, police, border and customs officials, government officials, employees and agents, Iran's banks, businesses, charity organizations, Al-Qaeda, Al-Qaeda operatives and sympathizers and others, known and unknown, to conceal or disguise the nature, location, source or ownership of Al-Qaeda's material support or resources, 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 assault and murder).

323. Iran's conduct amounted to a violation of 18 U.S.C. § 2339B in that on and prior to the Boston Marathon Bombings, it knowingly provided material support or resources to Al-Qaeda, and/or Iran conspired to knowingly provide material support or resources to Al-Qaeda with Iran's intelligence apparatus, military, police, border and customs officials, government officials, employees and agents, Iran's banks, businesses, charity organizations, employees and agents, Al-Qaeda, Al-Qaeda operatives and sympathizers and/or others, known and unknown, with the knowledge that Al-Qaeda was a designated Foreign Terrorist Organization, has engaged or engages in terrorist activity or has engaged or engages in terrorism.

324. Iran's conduct amounted to a violation of 18 U.S.C. § 2339C on and prior to the Boston Marathon Bombings, as detailed within, when it provided material support to Al-Qaeda and/or conspired with Iran's intelligence apparatus, military, police, border and customs officials, government officials, employees and agents, Iran's banks, businesses, charity organizations, Al-Qaeda, Al-Qaeda operatives and sympathizers and others, known and unknown, to provide or collect funds for Al-Qaeda, with the intention that such funds be used, or

with the knowledge that such funds were to be used, in full or in part, to carry out an act or acts of international terrorism.

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

- a) intentionally aided, abetted and counseled Al-Qaeda by providing it with material support, resources and funding with the knowledge that Al-Qaeda would use such assistance to commit an act or acts of international terrorism; and/or
- b) believing it was probably rendering aid in the form of material support or resources and funds to Al-Qaeda to engage in a crime, provided Al-Qaeda with the means or opportunity for the commission thereof and which in fact aided Al-Qaeda to commit the Boston Marathon Bombings; and/or
- c) conspired with Iran's intelligence apparatus, military, police, border and customs officials, government officials, employees and agents, Iran's banks, businesses, charity organizations, Al-Qaeda, Al-Qaeda operatives and sympathizers and others known and unknown, to violate relevant state criminal laws on facilitating and aiding and abetting a crime and committing an act or acts of terrorism, including assault, hijacking, kidnapping and murder.

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

- a) involve a violent act or acts dangerous to human life, as demonstrated by the known and foreseeable outcomes of injury and death resulting from providing substantial assistance to Al-Qaeda terrorists;

- b) were committed primarily outside the territorial jurisdiction of the United States and also transcended national boundaries in terms of the means by which they were accomplished, the persons they appear intended to intimidate or coerce, and the locales in which their perpetrators operated; and
- c) appeared to be intended to intimidate or coerce a civilian population; to influence the policy of a government by intimidation or coercion; or, to affect the conduct of a government by mass destruction, kidnapping or assassination.

327. The aforesaid acts of Iran were not mere negligence, but each act individually and/or in combination with one or more acts constituted conduct that was intentional, reckless, willful and/or grossly negligent and each of those acts individually and/or in combination with one or more of those acts was a proximate cause of the Boston Marathon Bombings and the resulting injuries and deaths of Plaintiffs' decedents.

328. The Boston Marathon Bombings could not have occurred absent the knowing and substantial assistance provided to Al-Qaeda and/or AQAP by Iran. Those attacks and resulting injuries and deaths were a natural, probable and reasonably foreseeable consequence of Iran's conduct.

329. As a result, Iran is liable to plaintiffs for all damages resulting from the injuries and deaths in the Boston Marathon Bombings.

330. Plaintiffs, the surviving family members of each decedent, the decedents and their Estates have suffered and will continue to suffer past and future damages as a result of the injuries and deaths sustained in the Boston Marathon Bombings, including but not limited to: personal injury damages, wrongful death damages, survival damages, economic damages, pecuniary loss, non-economic damages, pain and suffering, fear of impending death, physical

trauma, mental anguish, mental distress, grief, loss of enjoyment of life, loss of earnings, financial support, services, companionship, care, guidance, consortium, solatium, burial costs, medical and other expenses and other provable damages allowed by law.

VII. REQUEST FOR RELIEF

WHEREFORE, Plaintiffs pray for the following relief:

- a) For an award of appropriate compensatory damages under 28 U.S.C. § 1605A and 28 U.S.C. § 1605B;
- b) For an award of treble and punitive damages under 28 U.S.C. §§ 1605A and 1605B in an amount sufficient to punish and/or deter similar conduct;
- c) For reasonable attorney's fees and costs;
- d) For prejudgment and postjudgment interest; and
- e) For all other available and appropriate relief

February 13, 2026

By: /s/ Robert A. Braun
Robert A. Braun (D.C. Bar 1023352)
Grace Choi (D.C. Bar 90040147)
**COHEN MILSTEIN SELLERS & TOLL
PLLC**
1100 New York Ave. NW • Eighth Floor
Washington, DC 20005
(202) 408-4600
RBraun@cohenmilstein.com
gchoi@cohenmilstein.com