

Matt Putterman, Cal. Bar No. 306845
 Putterman Law, APC
 5120 Campus Dr, Ste 250
 Newport, CA 92660-2101
 matt@putterman-law.com
 (949) 271-6382

Terri Marsh, DC Bar No. 447125,
 application for admission *pro hac vice*
 forthcoming
 Matthew Griechen, DC Bar No. 1686982,
 application for admission *pro hac vice*
 forthcoming
 Human Rights Law Foundation
 1333 New Hampshire Ave. NW
 Suite 204
 Washington, DC 20036
 terri.marsh.hrlf@gmail.com
 (202) 774-0893
 matthew.griechen.hrlf@gmail.com
 (202) 847-5167

Attorneys for Plaintiffs Junwei Jia and Huanjun Li Kohel

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

JUNWEI JIA and HUANJUN LI KOHEL,

Plaintiffs,

vs.

PEOPLE’S REPUBLIC OF CHINA,

Defendant.

Case No.:

Judge:

COMPLAINT FOR

- 1. Bias-Motivated Violence under Cal. Civil Code §§ 51.7 & 52;**
- 2. Assault**
- 3. Battery**
- 4. Intentional Infliction of Emotional Distress**

DATED: November 13, 2025

1 Junwei Jia and Huanjun Li Kohel (“Plaintiffs”), bring this action against the People’s
2 Republic of China (“Defendant” or “PRC”), and allege as follows:

3 **NATURE OF ACTION**

4 1. This case arises out of the PRC’s efforts to project its power around the world and
5 repress those who it deems enemies, largely those who dare criticize the PRC’s authoritarian
6 regime or the corrupt and abusive acts of its officials. Plaintiffs seek to hold the PRC
7 accountable for interfering with their rights to protest and speech in the United States.

8 2. Defendant PRC is a brutal authoritarian state controlled by the Chinese
9 Communist Party (“CCP”). As is common in authoritarian regimes, the CCP views dissent from
10 official lines as a major threat to the Party’s overwhelming control. As such, the PRC harshly
11 punishes dissent, regularly using torture, arbitrary detention, and extrajudicial killing to silence
12 dissenters and keep them in line.

13 3. The PRC is unique, however, in the scale of its efforts to project this system of
14 control to all its nationals or former nationals abroad. The CCP uses its massive resources and
15 personnel to operate a transnational repression campaign across the globe. This campaign is
16 unique in its gargantuan scope and effectiveness.

17 4. The PRC is extra sensitive to any criticism or opposition to its leaders, especially
18 CCP General Secretary and PRC President Xi Jinping. The PRC goes the extra mile to spare Xi
19 from the sight of protests, and this tendency is heightened when Xi travels abroad and such
20 protests could be distinctly embarrassing to him and the Party.

21 5. In November 2023, Xi Jinping travelled to San Francisco, California to attend a
22 summit of the Asia-Pacific Economic Cooperation (“APEC”) forum. This was Xi’s first trip to
23 the United States since 2017. Because the United States has a robust tradition of freedom of
24 speech and is home to many Chinese nationals who obtained asylum after fleeing persecution by
25 the PRC, PRC authorities were especially sensitive to the need to crack down on dissent.

26 6. This case arises out of a conspiracy by PRC Embassy and consular officials and
27 those connected to the PRC diaspora in the United States to suppress protest of Xi Jinping or the
28

1 CCP during Xi's visit to San Francisco for APEC, including through violence. Pursuant to that
2 conspiracy, PRC employees and their co-conspirators violently attacked Plaintiffs Li and Jia
3 during APEC while they were exercising their First Amendment rights and petitioning for justice
4 for the abuses they and their families suffered at the hands of the PRC.

5 **THE PARTIES**

6 7. Huanjun Li Kohel is a resident of Fulton County, Georgia and a citizen of the
7 PRC. The PRC persecuted her and her family in China. Mrs. Li came to the United States in
8 2015 and now has permanent resident status. She was attacked in San Francisco in November
9 2023 during CCP General Secretary Xi Jinping's visit for the APEC summit.

10 8. Junwei Jia is resident of Los Angeles County, California and citizen of the PRC.
11 The PRC persecuted her and her family in China, and she escaped and applied for asylum in the
12 United States in 2023. Mrs. Jia was attacked in San Francisco in November 2023 during Xi
13 Jinping's visit for the APEC summit.

14 9. Defendant PRC is a foreign state. Defendant maintains an Embassy at 3505
15 International Place NW, Washington, DC 20008. Defendant maintains multiple Consulates
16 General in the United States, including one in Los Angeles at 500 Shatto Place, 3rd Floor, Los
17 Angeles, CA 90020 and one in San Francisco at 1450 Laguna Street, San Francisco, CA 94115.
18 Defendant PRC also maintains a residence for its Ambassador at 2301 S Street NW, Washington,
19 DC 20008. At all times relevant herein, Defendant acted through its officials, employees, and
20 agents.

21 **JURISDICTION**

22 10. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1330 and 28
23 U.S.C. § 1605(a) as Plaintiffs seek money damages from a foreign state for personal injury
24 occurring in the United States and caused by the tortious act or omission of that foreign state and
25 of officials or employees of that foreign state acting within the scope of their office or
26 employment.

11. This Court has personal jurisdiction over Defendant pursuant to 28 U.S.C. § 1330(b), as Plaintiffs intend to serve Defendant pursuant to 28 U.S.C. § 1608(a), and because Defendant purposely directed its efforts to silence dissent at those protesting Xi Jinping or the CCP in the United States, Defendant's employees in the United States directed these efforts, Plaintiffs' claims arise out of the implementation of Defendant's conspiracy in the United States, and the exercise of personal jurisdiction is reasonable.

12. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(f)(1), as a substantial part of the events giving rise to Plaintiffs' claims occurred in San Francisco, California.

DIVISIONAL ASSIGNMENT

13. Because a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in the City and County of San Francisco, this case should be assigned to the San Francisco Division of this Court pursuant to Civil L.R. 3-2(d).

STATEMENT OF FACTS

The PRC Regularly Abuses Protesters and Critics

14. The PRC is an authoritarian one-party state controlled by the CCP. The CCP's primary motivation is its own survival. To sustain its brutal grip on power, the CCP routinely monitors and targets those who dissent from officially approved positions, as dissent is seen as a grave threat to the Party's security.

15. China focuses its repression on those who discuss specific subjects, such as reform of the PRC's authoritarian government. The PRC is especially sensitive to any critique of or disturbance to CCP leaders. For example, the PRC has gone after those who have said CCP General Secretary Xi Jinping resembles the cartoon character Winne the Pooh.

16. The PRC also constructs particular groups as enemies. One former Chinese diplomat revealed that the CCP refers to its enemies as "Five Poisonous Groups," and this includes pro-democracy activists, Falun Gong believers, Tibetan "Separatists," Taiwan pro-

1 independence forces, and Uyghur “Separatists.” The PRC violently cracks down on members of
2 these groups in China and overseas.

3 17. China also regularly targets “petitioners” and subjects them to torture, kidnapping,
4 and arbitrary detention. Petitioners are those who formally complain to government officials
5 about mistreatment or injustice and request redress for their grievances. The practice is rooted in
6 centuries of Chinese history and culture. Indeed, Confucian-era texts described commoners in
7 imperial China submitting complaints to the emperor.

8 18. While the right to petition is theoretically protected under PRC law, in practice
9 petitioning regularly leads to violent retaliation. A 2004 study, for example, examined the cases
10 of two thousand petitioners and found that while almost none of the petitioners obtained a
11 remedy, more than half reported that they were beaten by state officials in response to their
12 protest.

13 19. This tendency to violate firmly established legal prohibitions is characteristic of
14 the CCP’s authoritarian rule in China and its approach to the rule of law. For example, while
15 torture is technically prohibited under law, nearly all credible monitors agree that torture remains
16 widespread and systematic in the country. Indeed, even senior PRC officials have admitted
17 torture is prevalent.

18 **The PRC’s Unprecedented Transnational Repression Campaign**

19 20. The PRC’s abuse and targeting of perceived critics goes well beyond China’s
20 borders. As Freedom House has found, the CCP perpetrates a transnational repression campaign
21 that is “the world’s most sophisticated, comprehensive, and far-reaching” and that is “unique in
22 the scale and ambition of its efforts.”¹ In 2023, the U.S. Department of Homeland Security
23 explained that the PRC uses transnational repression to undermine individual rights and
24

25 ¹ Yana Gorokhovskaia, *How to Resist China’s Campaign of Transnational Repression*, Freedom
26 House (July 28, 2022), [https://freedomhouse.org/article/how-resist-chinas-campaign-](https://freedomhouse.org/article/how-resist-chinas-campaign-transnational-repression)
27 [transnational-repression](https://freedomhouse.org/article/how-resist-chinas-campaign-transnational-repression).

1 predicted that China would remain one of biggest offenders pursuing transnational repression in
2 the United States that year.

3 21. The PRC's transnational repression operates in tandem with "united front work."
4 The concept of the "united front" is rooted in Leninist theory and aims to unite disparate actors
5 to defeat greater ones. It co-opts potential allies, neutralizes or subverts potential opponents, and
6 is a key means the CCP uses to influence the beliefs of foreign actors and policies of foreign
7 nations. CCP General Secretary Xi Jinping has transformed united front work during his tenure.
8 In September 2014, Xi described it as the CCP's magic weapon.

9 22. United front work is a whole Party effort and thus is distributed among many CCP
10 and PRC agencies and actors. The primary group formulating and implementing united front
11 policies is the United Front Work Department, a senior CCP body that reports directly to the
12 CCP's Central Committee. As part of a long tradition of "double-hatting," where CCP officials
13 hold roles in multiple agencies, United Front personnel often serve within the PRC's Ministry of
14 Foreign Affairs and work under diplomatic cover at the PRC's embassies and consulates in
15 foreign nations. These positions enable the officials to direct the activities of Chinese
16 community groups in the host nation behind the scenes while trying to maintain a façade of
17 separation.

18 23. The PRC endeavors to stifle dissent by its perceived enemies in a variety of ways.
19 It directs physical attacks on and renditions of persons overseas and organizes pro-CCP actors to
20 target and drown out protest. It pressure foreign countries and uses legal maneuvers to go after
21 perceived enemies. It regularly intimidates persons with digital threats and surveillance. It also
22 threatens and coerces the family members of its targets that remain in China as a means of
23 blackmailing those outside the country.

24 24. China directs physical attacks and threats on perceived enemies around the world.
25 Freedom House maintains a transnational repression database that conservatively collects
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27

1 instances of direct physical attacks outside a target's country of origin. Between 2014 and 2021,
2 Freedom House identified 214 cases by the PRC, a greater number than any other country.

3 25. In October 2022, for example, Chinese consular officials attacked a Hong Kong
4 protester in Manchester, United Kingdom. Protesters had gathered nearby the Consulate and
5 displayed critical images of CCP General Secretary Xi Jinping wearing a crown. After
6 unidentified men attacked the protesters and attempted to steal the images, consulate staff,
7 including Consul General Zheng Xiyan, dragged one of the protesters by his hair into the
8 compound. Inside, the consulate staffers repeatedly punched and kicked the protester. The PRC
9 defended this action, with Consul General Zheng arguing it was his duty to react that way to
10 insults to Xi Jinping.

11 26. Similarly, in July 2024, a security guard working at the PRC Consulate General in
12 New York allegedly attacked a petitioner. In that instance, a handful of petitioners stood on the
13 sidewalk near the building with signs. And a security guard hit one, knocking the man to the
14 ground and causing him to bump his head and lose consciousness for nearly fifteen minutes.

15 27. The PRC is especially sensitive to the possibility that state delegations on visits
16 abroad will be exposed to protest, even more so when CCP General Secretary Xi Jinping travels.
17 To avoid this possibility, the PRC regularly deploys violence and other tactics to suppress dissent
18 during planned visits, typically coordinated through embassy and consulate staff. One report
19 from 2025 identified seven instances where local law enforcement suppressed protests during
20 visits by Xi Jinping, likely at the explicit or implicit encouragement or demand of PRC
21 authorities.

22 28. During a 2014 visit by a PRC delegation to the Czech Republic, a Chinese
23 Embassy official attacked members of a religious minority persecuted by the CCP who were
24 staging a protest. The Embassy official pushed them, attempted to steal their property, and
25 harassed them. Czech authorities arrested the Embassy official.

1 29. That same year, CCP General Secretary Xi Jinping visited Argentina. Members
2 of the same religious minority again organized a demonstration to call on Xi Jinping to end the
3 regime's brutal torture and detention of members of the faith. The group was repeatedly targeted
4 by Chinese nationals, requiring a police line to protect them. But during one of the protests, a
5 vice military attaché of the PRC Embassy in Argentina attempted to push through the police line
6 and attack the protesters. Law enforcement took the attaché into custody.

7 30. Chinese embassy and consular officials in the United States often work to
8 suppress dissent around visits by state delegations by paying and organizing CCP supporters.

9 31. In 2015, for example, a prominent PRC agent named Lu Jianwang organized a
10 group of CCP supporters to demonstrate in Washington, DC during a visit by CCP General
11 Secretary Xi Jinping. In an interview with the Federal Bureau of Investigations, Lu admitted that
12 the PRC Consulate General in New York requested that he organize the group. The goal was to
13 ensure that Falun Gong believers did not disturb Xi by protesting and the demonstration was
14 directed by a senior official at the Consulate General. Lu further described how the Consulate
15 General would identify a contact person to pay the participants \$60 each in cash to attend. A
16 senior PRC official later presented Lu with a plaque to commemorate his work to ensure that Xi
17 was not disturbed by dissenting voices. In 2023, the FBI arrested Lu in part for his role in
18 operating a Chinese overseas police station in Manhattan.

19 32. Chinese embassy and consular officials also work to organize protests against
20 opponents and enemies of the regime. In April 2023, Li Chunlin, the Deputy Consul General of
21 the PRC Consulate General in Los Angeles, reportedly worked organized a mass protest to
22 disrupt a meeting between then-Taiwanese president Tsai Ing-Wen and then-Speaker of the U.S.
23 House of Representatives Kevin McCarthy. Those who agreed to participate in the protest were
24 expected to receive payments of around \$400 each.

Plaintiffs' Backgrounds Petitioning and Protesting the CCP***Mrs. Li's Persecution and Protest***

33. In 2011, Mrs. Li was living in a property in Fengtai District, Beijing, PRC. In November of that year, local authorities informed residents that they must vacate their properties even though they did not follow proper legal procedures. Authorities pursued this dispossession so they could transfer the land to developers who planned to build a high-rise and sell luxury properties at steep prices for private gain. By contrast, officials offered the residents only 8,000 yuan per square meter of their properties, a paltry sum in comparison to the anticipated sale prices.

34. While some declined to resist the authorities, others like Mrs. Li refused to vacate their properties. Officials then launched a campaign designed to terrorize the holdouts. For example, in April 2012, two local officials lead a mob of hundreds of people to surround Mrs. Li's home. They cut off the electricity. On other occasions, criminal gangs threatened and attacked the holdouts, severing telephone lines and smashing cars.

35. On July 4, local officials brought a large mob to clear the area. This mob managed to demolish six houses, but Mrs. Li persisted in her protest, and her house was temporarily spared.

36. Escalating matters even further, police arrested Mrs. Li two days later. Initially the police refused to give Mrs. Li food. They then transferred her to another detention center where she was confined to a small area with thirty others. The room was so small that it was exceptionally difficult to sleep, and the conditions were filthy, with insects and mold covering the available bedding.

37. Authorities demolished Mrs. Li's house on July 12th while she was still detained. Before they did so, a large mob stole from Mrs. Li's younger brother and beat him up, leaving him covered in bruises. Mrs. Li only learned of this when she was finally released from detention on July 13.

1 38. Authorities also went after Mrs. Li's sister the next month. They picked her up
2 and detained her in a black jail. By September she was completely emaciated. When Mrs. Li
3 discovered her sister's life-threatening deterioration, she went to CCP headquarters to petition,
4 fortunately convincing authorities to permit her sister to obtain medical treatment. Her sister
5 suffers from health issues from this mistreatment to this day.

6 39. Now homeless, Mrs. Li was forced to live in a tent on the site of her demolished
7 home. Mrs. Li tried to petition the government for redress, but local authorities blocked her from
8 doing so. In this period, gangs frequently abused Mrs. Li.

9 40. One year after the demolition of her home, authorities arrested Mrs. Li. This time
10 they arbitrarily detained her for six months and they abused her in detention.

11 41. Mrs. Li opposes the CCP's authoritarian grip on the PRC. She firmly believes
12 that governments should care for the welfare of their citizens and promote human flourishing,
13 not terrorize them as the CCP does.

14 42. Since moving to the United States, Mrs. Li has regularly participated in protests
15 against the CCP and petitioned at the PRC Embassy in Washington, DC, calling for justice for
16 her and her family. All the while, PRC authorities continue to retaliate and abuse Mrs. Li's
17 family members who remain in China.

18 43. In 2015, Mrs. Li regularly travelled to the PRC Embassy in Washington, DC. At
19 first, Mrs. Li attempted to present petition materials to staff at the Embassy. But the Embassy
20 refused to accept the materials and ignored Mrs. Li. But she persisted, periodically standing in
21 front of the Embassy building and calling for justice.

22 44. In September 2015 Mrs. Li protested during a visit CCP General Secretary Xi
23 Jinping to the United States. Xi travelled to Washington, DC and Mrs. Li called for justice,
24 attracting the attention of PRC officials. On that occasion, members of the PRC delegation
25 received Mrs. Li's petition materials. Those officials, however, did not respond to Mrs. Li's call
26 for justice.

1 45. In 2015, 2022, and 2023, Mrs. Li was regularly in Washington, DC and called on
2 PRC officials to return her home and to end the persecution of her family. Mrs. Li would do so
3 at the PRC Embassy and at the residence of the PRC Ambassador to the United States.

4 46. During this time, Mrs. Li regularly posted photographs and videos of her protest
5 and petitioning activity on social media websites.

6 47. During these protest activities, Mrs. Li began to recognize an employee of the
7 PRC Embassy (“PRC Employee 1”). As part of his duties, this employee sometimes organized
8 demonstrations of support for PRC leaders.

9 48. Mrs. Li observed PRC Employee 1 working for Qin Gang, PRC Ambassador to
10 the United States from 2021 to 2023, and Xie Feng, the PRC’s current Ambassador to the United
11 States.

12 49. On various occasions in 2022 and 2023, Mrs. Li observed PRC Employee 1 at the
13 PRC Embassy on International PI NW, the residence of the PRC Ambassador on S St NW, and
14 at the residence of the then-Deputy Chief of Mission and Minister Xu Xueyuan.

15 50. In that period, Mrs. Li observed PRC Employee 1 enter the PRC Embassy
16 building through the back door with a key card and through the front door with the assistance of
17 security guards.

18 51. In that same period, Mrs. Li observed PRC Employee 1 enter the residence of the
19 PRC Ambassador with a key.

20 52. On October 27, 2023, China’s Foreign Minister, Wang Yi, was in Washington,
21 DC on an official visit. That morning, Wang Yi travelled to the U.S. Department of State to
22 attend a meeting with then-Secretary of State Anthony Blinken. PRC Employee 1 organized a
23 show of support for Wang Yi outside of the Harry S. Truman Building, gathering a small crowd
24 with PRC and United States flags.

Mrs. Jia's Persecution and Protest

53. In 2013, Mrs. Jia lived in Harbin in Heilongjiang Province, PRC. Her family owned and operated a factory that bred and raised white rabbits.

54. That year, the local government seized the property and demolished the factory.

55. In response, Mrs. Jia and her family began to petition the government to obtain redress for the unlawful seizure of their property. Mrs. Jia's father, Jia Ruifeng, started petitioning relevant government authorities requesting redress. PRC officials reacted by subjecting Mr. Jia to a campaign of persecution, detaining him on multiple occasions and hiring gangsters to target Mr. Jia and his family.

56. In 2016, authorities arrested Mr. Jia and accused him of extortion. Officials subjected him to a sham judicial proceeding. They barred Mr. Jia from hiring an attorney and prevented his family from viewing any so-called "evidence" in the case. A court sentenced Mr. Jia to four years in prison.

57. Approximately one year later, Mr. Jia died in Qitaihe prison under mysterious circumstances. Authorities refused Mrs. Jia and her family access to the prison to see his body. To this day, nearly eight years later, authorities still refuse to transfer Mr. Jia's body to his surviving family.

58. Throughout this time, Mrs. Jia also petitioned for justice, including by travelling to Beijing to petition the central government. In response, authorities repeatedly threatened, beat, and detained her. The persecution of her and her father profoundly affected Mrs. Jia.

59. In 2023, Mrs. Jia fled from the CCP's persecution, ultimately coming to the United States where she applied for asylum.

60. Since her arrival, Mrs. Jia has continued her protest activities. Between August and October 2023, Mrs. Jia regularly protested in front of the PRC Consulate General in Los Angeles. On these occasions, Mrs. Jia prepared banners and signs and spoke about the persecution she and her family experienced at the hands of the PRC.

1 61. Through these protest activities, Mrs. Jia became known to officials and
2 employees of the Consulate General. Mrs. Jia observed staff and officials come into and out of
3 the building. Employees of the Consulate General also contacted law enforcement about Mrs.
4 Jia, falsely complaining that she was causing disruptions at the building.

5 62. Mrs. Jia also broadened her protest. Believing she was safe in the United States
6 and that her freedom of speech would be protected, Mrs. Jia wanted to advocate on behalf of
7 those in China who lack such liberties. She began regularly creating videos narrating situations
8 of injustice in Chinese provinces and cities and posting them to social media platforms like
9 TikTok and Weibo.

10 **The PRC's Conspiracy to Suppress Protest of Xi Jinping and the CCP during the APEC**
11 **Summit**

12 63. In the months before CCP General Secretary Xi Jinping's trip to the United States
13 in November 2023, officials in the PRC's Embassy and Consulates General prepared for the
14 visit. Upon information and belief, those officials knew and had reason to know that protests of
15 Xi and the CCP would be widespread and well-attended and thus planned to engage trusted
16 members of the Chinese diaspora and other overseas Chinese to disrupt protesters through any
17 means necessary, including violence.

18 64. PRC law prohibits the intentional infliction of injuries on others, as well as
19 committing the same crime with others or instigating others to commit crimes. This prohibition
20 specifically applies to state functionaries and consular officials when they are abroad.

21 65. PRC consular officials reached out to leaders of pro-CCP organizations based in
22 the United States and asked them to organize large groups to travel to San Francisco during Xi
23 Jinping's visit. For example, one organizer named Lu Qiang booked 400 hotel rooms and
24 arranged for 800 people to travel to San Francisco. Lu has acknowledged he is a volunteer with
25 the PRC's overseas consular assistance program. Another organizer named Chen Shanzhuang
26 likewise has close relationships with the PRC's Consulates General and assists with providing
27

1 consular services. In fact, a website of the PRC Ministry of Foreign Affairs touted Chen's work
2 with the Consulate General in New York. Based on these ties both Chen and Lu attended an
3 invitation-only banquet for Xi Jinping during APEC.

4 66. PRC consular officials paid money to individuals and groups that travelled to San
5 Francisco. According to several sources, those payments included direct cash payments for
6 participation in demonstrations of support for Xi Jinping and payments for travel and lodging.
7 One such participant in the pro-CCP demonstrations claimed to be receiving \$200 per day for
8 attending.

9 67. Before the summit, PRC consular officials engaged Precision Security Solutions,
10 doing business as National Protective Services, and Critical Synthesis Security to provide
11 security guards for APEC. Chinese consular officials directed the conduct of the guards before
12 and during APEC. A consular official told one guard that his job was to protect CCP supporters
13 in the crowds. A consular official instructed another guard to jump into any potential
14 altercations. One guard recalled that the consular officials insinuated they wanted the guards to
15 use violence against those protesting the CCP and this guard left the job early due to discomfort
16 at the direction.

17 68. Upon information and belief, PRC Embassy or consular officials directly or
18 indirectly asked Li Huahong to serve as one of the overseas Chinese leaders to organize CCP
19 supporters to travel for APEC in 2023.

20 69. Li Huahong is a resident of New York with a history of targeting individuals and
21 groups treated as enemies by the CCP.

22 70. Li Huahong holds herself out as the Chairperson of the Chinese Anti-Cult World
23 Alliance. This organization is an international offshoot of Anti-Cult Associations in China that
24 are directed by CCP and PRC officials and used as part of the violent suppression campaign
25 against Falun Gong, a peaceful religious movement that originated in China. In this role, Li
26
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1 Huahong has repeatedly engaged in physical violence against Falun Gong believers or their
2 supporters in the New York area.

3 71. In July 2011, for example, Li Huahong targeted two Falun Gong believers who
4 were proselytizing in Flushing. Li attempted to destroy a cart full of proselytization materials,
5 pushing the cart and eventually grabbing an older woman. Li caused an injury to her hand to
6 feign that she was attacked, yelling Falun Gong hit people. When a large group of men came to
7 the scene and one of the victims ran away to get help, Li yelled beat her to death, make her to
8 die.

9 72. In January 2013 Li Huahong was convicted of assault with intent to cause injury.
10 The charges resulted from an incident where a man intervened to prevent Li Huahong from
11 attacking a Falun Gong believer. Li Huahong instead turned towards the man, repeatedly
12 punching him and clawing at his face, tearing off a strip of skin. In this incident, a crowd of men
13 again came to reinforce Li's attack.

14 73. Li Huahong has relationships with key CCP and PRC officials, including those
15 based in the PRC Embassy and Consulates General.

16 74. According to reports, a senior CCP official travelled to the United States in
17 January 2012 to present Li Huahong with an award. That official was a deputy of Zhou
18 Yongkang, then-Secretary of the Central Political and Legal Affairs Commission of the CCP.
19 This official presented Li with an award to recognize her work targeting Falun Gong in Flushing.

20 75. Upon information and belief, Li Huahong regularly communicates with officials
21 at the PRC Embassy and the PRC Consulates General. Li brags to the targets of her intimidation
22 about her connections. For example, in 2011, Li approached a table of Falun Gong believers.
23 She told them that she has photographs of them and that they are on a blacklist with the PRC
24 Ambassador to the United States. On another occasion in 2012 or 2013, Li told a Falun Gong
25 believer that she took pictures of her and provided her name to a PRC Consulate General.

1 76. Li Huahong's attacks on those critical of the CCP have been covered in media
2 sources, including the *New York Times* and *Epoch Times*.

3 77. Upon information and belief, PRC consular officials requested that Li Huahong
4 organize members of the Chinese Anti-Cult World Alliance and others to travel to San Francisco
5 during the APEC summit and to demonstrate in support of Xi Jinping and to suppress dissent
6 from anyone protesting Xi or the CCP by any means necessary and Li Huahong agreed to do so.

7 78. Upon information and belief, PRC consular officials directly or indirectly paid Li
8 Huahong \$200 per day she was present in San Francisco and paid for her flight from New York,
9 her lodging in San Francisco, and her meals.

10 79. Upon information and belief, PRC consular officials knew that Li Huahong had a
11 history of using violence to suppress anti-CCP speech and protest and thus knew she was likely
12 to engage in violence during the APEC summit.

13 **The PRC and Its Co-Conspirators Violently Suppressed Anti-CCP Protests at APEC**

14 80. CCP General Secretary Xi Jinping was scheduled to arrive in San Francisco on
15 the afternoon of November 14, 2023. He would stay in California until November 17, 2023.
16 During his trip, Xi was scheduled to make appearances at many events. Xi and other members
17 of the PRC delegation planned to stay at the St. Regis Hotel located at 125 3rd Street, San
18 Francisco.

19 81. On November 8, 2023, Mrs. Li travelled to San Francisco along with other
20 petitioners. Mrs. Li planned to protest the CCP and petition for justice for the PRC's corrupt
21 confiscation of her home and the persecution of her and her family.

22 82. On November 13, 2023, Mrs. Jia, her husband, and her son travelled to San
23 Francisco. They planned to protest the CCP and petition for redress of their grievances in
24 locations where Xi Jinping would be staying or travelling.

25 83. That day, Mrs. Jia (pictured below) protested outside the St. Regis Hotel with a
26 large sign. The sign stated "Xi Jin Ping / Give me back / My father / My property / My family /
27

My justice / My human rights.” While she did so, she noticed people near the hotel that appeared to her to be PRC consular officials or members of the PRC delegation filming or photographing her.



84. In anticipation of Xi Jinping’s arrival, local law enforcement took extensive security precautions. Law enforcement installed large fences on the sidewalks on both sides of 3rd Street so that the public could not access the street or the entrance to the St. Regis Hotel. Despite the fencing, someone travelling in a motorcade on the street would be able to see signs and other forms of protest through the fence. A large number of law enforcement personnel from multiple agencies were amassed in the area.

85. CCP General Secretary Xi Jinping arrived at San Francisco International airport around 3 PM local time on the afternoon of November 14, 2023. From the airport, Xi planned to travel by motorcade to the St. Regis Hotel.

86. CCP supporters congregated at the San Francisco International airport and along the anticipated route of Xi’s motorcade. They often carried large PRC flags that would prevent those in the motorcade from seeing anyone behind them. A large number of CCP supporters also gathered across the street from the St. Regis Hotel.

1 ***The Attack on Mrs. Li***

2 87. On November 14th, Mrs. Li went to the St. Regis Hotel area before Xi Jinping's
3 motorcade had passed by. She and her friends planned to go to the hotel to protest. When they
4 arrived, they encountered a sea of CCP supporters with PRC flags and welcome banners. Mrs.
5 Li decided to walk around the area to look for others, as she knew many petitioners, democracy
6 activists, and others were also planning to protest Xi Jinping and the CCP that day.

7 88. Mrs. Li eventually made her way to the intersection of Bryant and 3rd Streets.
8 There, she observed many CCP supporters congregated along the edge of the street. Law
9 enforcement officers from multiple agencies were present on the scene and there were barricades
10 on some of the sidewalks. CCP supporters held up large red banners behind some of the
11 barricades.

12 89. Mrs. Li was one of only a handful of persons in the area that actively protested Xi
13 Jinping and the CCP, far outnumbered by the CCP supporters.

14 90. Mrs. Li noticed that PRC Employee 1 was present at this location wearing a black
15 hat, a black jacket, black pants, and an earpiece. Upon information and belief, PRC Employee 1
16 had been tasked with organizing CCP supporters along the motorcade route and ensuring that no
17 anti-CCP protesters would be visible from the motorcade. A group of security guards from the
18 National Protective Services appeared to be following PRC Employee 1's directions.

19 91. Sometime later, the first vehicles in the law enforcement escort for Xi's
20 motorcade started to pass by. Many law enforcement personnel on motorcycles drove on 3rd
21 street in the direction of the St. Regis Hotel. Uniformed law enforcement personnel also stood
22 close to the street.

23 92. At this time, Mrs. Li was a fair distance away from the crowds standing at the
24 barricade that was close to 3rd street.

1 93. PRC Employee 1 noticed Mrs. Li and perceived her as a CCP opponent. Using
2 signals, hand gestures, and other means, PRC Employee 1 directed the group of CCP supporters
3 he was with to raise a large PRC flag and block Mrs. Li from view.

4 94. Mrs. Li tried to walk away from PRC Employee 1 and his group, moving towards
5 the barricade where she could potentially see the street and the motorcade. PRC Employee 1, the
6 CCP supporters using the flag to block her from view, and the security guards followed Mrs. Li.
7 PRC Employee 1 came up behind Mrs. Li and grabbed her by the back of her coat. He pulled
8 her, moved in front of her, and then pushed her away.

9 95. Mrs. Li tried again to get away from PRC Employee 1 and his crowd, walking in
10 the opposite direction. Yet they continued to follow her. Mrs. Li had only gotten a few feet
11 away and was still behind the large PRC flag. PRC Employee 1 came up behind her and pushed
12 her in the back, causing her to bump into a security guard. PRC Employee 1 again moved in
13 front of her. While trying to escape them, Mrs. Li repeatedly shouted “Xi Jinping.”

14 96. Mrs. Li tried to escape for a third time and moved in the opposite direction, but
15 PRC Employee 1 swiftly kept up with her and forcefully pushed her out of the way.

16 97. At this point, Mrs. Li was surrounded by PRC Employee 1, his group of CCP
17 supporters, and the security guards hired by the PRC. If she tried to move to the left or right
18 PRC Employee 1 and the crowd moved to block her. Mrs. Li was stuck for more than thirty
19 seconds.

20 98. Mrs. Li finally managed to break free and move in the opposite direction out from
21 behind the crowd and flag. But the crowd persisted and followed her. Security Guards linked
22 arms forming a human wall in front of members of the crowd holding the large PRC flag. They
23 then ran back and forth in front of and beside her.

24 99. PRC Employee 1 then threatened Mrs. Li, suggesting he would file a false police
25 report and tell law enforcement she was harassing him. Mrs. Li corrected him, explaining that he
26 is the one who was unlawfully touching her.

1 100. Suddenly, an older man in a black suit with a red hat (“John Doe 1”) carrying a
2 large PRC flag struck Mrs. Li in the head with the metal flagpole.

3 101. Mrs. Li felt a sharp pain in her head and felt disoriented. She was filled with fear.
4 She shouted that she had been hit and filmed John Doe 1. When she got closer to him, he
5 attempted to swat her phone out of her hands.

6 102. Upon information and belief, the PRC paid for John Doe 1’s transportation and/or
7 accommodation in San Francisco and/or offered him a daily payment to demonstrate in support
8 of the CCP.

9 103. Upon information and belief, the PRC knew John Doe 1 would be violent towards
10 anti-CCP protesters like Mrs. Li.

11 104. Upon information and belief, John Doe 1 agreed with PRC Employee 1 that he
12 would work with PRC Employee 1 and others to suppress anti-CCP protesters, including through
13 the use of violence.

14 105. Shortly after she was hit, Mrs. Li heard PRC Employee 1 telling the others to
15 quickly retreat and withdraw. He and other members of the crowd suddenly disappeared.

16 106. The impact to Mrs. Li’s head caused her great pain. She quickly developed a
17 headache and felt dizzy. Mrs. Li also observed a prominent vein on the spot that was not visible
18 before. She called the police to report the attack on her.

19 ***The Attack on Mrs. Jia***

20 107. Around noon on November 14, 2023, Mrs. Jia and her family returned to the St.
21 Regis Hotel area to protest. Mrs. Jia carried a large banner painted with Chinese characters. The
22 banner declared “Jia Junwei from Heilongjiang [c]all to end the persecution of Chinese people,
23 return my father, return my home.”

24 108. During the day, a large group of people supporting the CCP and welcoming Xi
25 Jinping periodically harassed Mrs. Jia and her family. At one point, she was surrounded by CCP
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1 supporters, and they used loudspeakers to blast sounds in her direction and drown her out. These
2 loudspeakers hurt Mrs. Jia's ears but did not deter her protest.

3 109. Large groups of CCP supporters were surrounding Mrs. Jia and her family and
4 trying to block them from view, so much so that, Mrs. Jia slowly moved towards the intersection
5 of Third and Mission Streets around 4:00 or 5:00 PM. There, Mrs. Jia held up her banner.

6 110. Li Huahong was present at the intersection. Li wore a red vest emblazoned with
7 Chinese Anti-Cult World Alliance on the back. Li carried a megaphone and wore a headset with
8 a microphone. Many of Li's associates were also present in the crowd and wearing articles of
9 clothing displaying the name of the Chinese Anti-Cult World Alliance.

10 111. After she noticed Mrs. Jia and her banner, Li moved to stand in front of Mrs. Jia.
11 This move seemed to signal to Li's associates and the crowd that they should cover Mrs. Jia. A
12 man with a very large PRC flag on a pole then moved the flag in front of Li, and Li's associates
13 grabbed the flag from the other side so that it would be fully stretched horizontally and cover
14 Mrs. Jia and Li.

15 112. Mrs. Jia tried to move to other locations to escape. But those with flags followed
16 her. More CCP supporters joined the effort, using another large flag to try and cover Mrs. Jia
17 and her banner so that the PRC delegation and the media covering Xi Jinping's trip would be
18 unable to see her.

19 113. Suddenly, Li Huahong came after Mrs. Jia. Li reached through the flags and
20 grabbed onto Mrs. Jia's banner, pulling it. But Mrs. Jia would not let go and so Li pulled at the
21 banner with greater force and with both hands.

22 114. Unable to take the banner away from Mrs. Jia, Li Huahong started pulling Mrs.
23 Jia's hair. Mrs. Jia was terrified.

24 115. Li Huahong and one of her associates continued grabbing at Mrs. Jia's banner and
25 walked towards the other side of the intersection, pulling Mrs. Jia along with them. As Li and
26
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1 her associate advanced forward, Mrs. Jia was forced to the ground. Shortly thereafter, Li
2 pretended to fall and knelt on the street.

3 116. When Mrs. Jia was forced onto the ground, members of the crowd that were
4 covering her with PRC flags before moved the flags to cover her again.

5 117. In the seconds after Mrs. Jia was pulled to the ground, she felt kicks to her head.
6 At this point, Mrs. Jia lost consciousness.

7 118. After he saw his wife on the street, Mrs. Jia's husband tried to bend down and
8 come to her aid. At least three of Li Huahong's associates, all wearing red vests emblazoned
9 with Chinese Anti-Cult World Alliance, grabbed him and forcefully pulled him backwards.
10 These associates started yelling at Mrs. Jia's husband, forcing a law enforcement officer nearby
11 to intervene and prevent the women from further advancing on Mrs. Jia's husband.

12 119. As Mrs. Jia lay unconscious on the ground, Li Huahong pretended that she could
13 not remove her foot from underneath Mrs. Jia, forcing law enforcement to assist her.

14 120. When Mrs. Jia regained consciousness, a member of law enforcement was
15 kneeling beside her. Later, Mrs. Jia reported to law enforcement how Li Huahong and the others
16 targeted and attacked her.

17 121. During the day, Mrs. Jia heard supporters of the CCP criticize her and her protest.
18 Some said that she was disgracing the Chinese people and others called her a liar.

19 122. After she regained consciousness, Mrs. Jia was in severe pain. Her head, waist,
20 and arm and leg on her right side were sore and painful. She also felt nauseous.

21 123. Ambulance staff inspected Mrs. Jia near the scene and applied ice packs to her
22 injuries. Mrs. Jia declined to go to the hospital at that time.

23 124. When Mrs. Jia returned to her home, however, she went to a doctor for treatment.
24 That doctor conducted a computed tomography scan of Mrs. Jia's brain, told Mrs. Jia she
25 suffered from a concussion, and prescribed her medication.

The PRC and Its Co-Conspirators Target Other Anti-CCP Protesters

125. In addition to targeting Mrs. Jia for her protest, Li Huahong directly targeted or was present when her associates targeted multiple other persons protesting the CCP or Xi Jinping during the APEC summit.

126. On November 15, 2023, around 7:30 PM local time, Li Huahong stood at a barricade near Third and Jessie Streets. The police set up the barricade around a designated zone for those who were protesting Xi Jinping and the CCP and the area was filled with Tibetans and Hong Kongers. CCP supporters armed with long metal poles tried to cross the barricade and started hitting those inside with the poles. Li Huahong, and others wearing vests emblazoned with the Chinese Anti-Cult World Alliance, stood at the barricade while the men were hitting anti-CCP protesters.

127. On November 16, 2023, around 12:00 PM local time, Li Huahong attacked another person protesting the CCP and Xi Jinping. Li recognized the victim because she had protested on previous days. When Li encountered her alone, Li stepped on her feet, stole from her, and hit her.

128. Other PRC employees from the PRC's Consulates General directly participated in violence against CCP protesters or were present when others did so.

129. On November 16, 2023, two employees of the PRC Consulate General in San Francisco, Wang Kun and Yang Bo, were present at the scene of an attack on anti-CCP protesters near the Moscone Center. That day, CCP supporters stood near a barricade holding large PRC flags. The CCP supporters began using the flagpoles to hit CCP protesters who were standing behind them with protest materials. Yang Bo came to the aid of the CCP supporters who started the altercation, pushing anti-CCP protesters away from the aggressors.

130. On that same day, these consular officials regularly spoke to Chen Zhaojin, a prominent overseas Chinese figure who serves as the Vice President of a pro-CCP group, the San Francisco Bay Area chapter of the Committee to Promote the Reunification of China and a

1 member of the PRC-linked All-China federation of Returned Overseas Chinese. Chen was
2 wearing an earpiece. Wang Kun stood within feet of Chen as Chen wrestled an anti-CCP
3 protester to the ground and fought with him when they both stood up.

4 131. On November 17, 2023, consular officials were also present while a crowd of
5 CCP supporters mobbed a Tibetan anti-CCP activist near the San Francisco international airport.
6 A large crowd of CCP supporters trapped the Tibetan activist on a bridge, surrounding her and
7 hitting her with their elbows, knees, and other body parts. Videos captured Li Chunlin, Deputy
8 Consul General of the PRC Consulate General in Los Angeles, and Wang Kun present in the
9 crowd. Chen Zhaojin was also present at this incident.

10 **The PRC and Its Coconspirators Caused Plaintiffs Ongoing Harm**

11 132. The PRC's brutal efforts to suppress Mrs. Li's speech and protest in the United
12 States has caused her ongoing pain and fear.

13 133. For quite a while after the incident, Mrs. Li continued to experience headaches
14 and dizziness. When these spells come on, Mrs. Li cannot function and can only try to rest.

15 134. The incident has also shattered Mrs. Li's sense of security about her protests. She
16 regularly feels depressed and anxious. For example, Mrs. Li often wakes up in the middle of the
17 night from nightmares fearful of what the PRC might try next.

18 135. The incident has also reactivated Mrs. Li's prior trauma from her and her family's
19 persecution in the PRC, as Mrs. Li is in a steady state of fear and anxiety worrying that the PRC
20 will try to harm her and her family again, especially her family members still in China.

21 136. The PRC's brutal efforts to suppress Mrs. Jia's speech and protest in the United
22 States has caused her ongoing pain and fear.

23 137. Following Li Huahong's attack on Mrs. Jia, she experienced ongoing pain in her
24 body for seven days. Her head ached and she felt pain in her waist and the right side of her
25 body.

1 147. At all times relevant herein, Defendant PRC acted through its officials or
2 employees, who were acting within the scope of their office or employment.

3 148. At all times relevant herein, Defendant PRC acted pursuant to a conspiracy
4 between PRC officials and employees based at the PRC's Embassy and Consulates General in
5 the United States, Li Huahong, John Doe 1, and others. Those co-conspirators agreed to
6 suppress the activities of anyone protesting Xi Jinping, the PRC, or the CCP during the APEC
7 summit in San Francisco, including through the use of violence. As such, Defendant PRC is
8 jointly and severally liable with its co-conspirators for the damages incurred by Plaintiffs.

9 149. Alternatively, Defendant PRC aided and abetted others in the perpetration of bias-
10 motivated violence against Plaintiffs, including Li Huahong and John Doe 1. Defendant
11 substantially assisted and encouraged these acts of bias-motivated violence by, *inter alia*, paying
12 Li Huahong and John Doe 1 and identifying Mrs. Li as a target, with knowledge that Li Huahong
13 and John Doe 1 would use violence against Plaintiffs to suppress their protest.

14 150. Plaintiffs suffered harm.

15 151. Defendant directly and proximately caused, and Defendant's conduct was a
16 substantial factor in causing, Plaintiffs' harm.

17 SECOND CAUSE OF ACTION

18 Assault

19 By Plaintiffs Li and Jia against Defendant PRC

20 152. Plaintiffs re-allege and incorporate all allegations with the same force and effect
21 as if fully stated herein.

22 153. When Li Huahong approached Mrs. Jia and moved to grab her banner and pull
23 her hair, she acted intentionally to cause Mrs. Jia harmful or offensive contact.

24 154. Mrs. Jia reasonably believed that Li Huahong was going to cause such harmful or
25 offensive contact.

26 155. Mrs. Jia did not consent to such contact.

1 156. When PRC Employee 1 and John Doe 1 approached Mrs. Li, they acted
2 intentionally to cause Mrs. Li harmful or offensive contact.

3 157. Mrs. Li reasonably believed that PRC Employee 1 and John Doe 1 were going to
4 cause such harmful or offensive contact.

5 158. Mrs. Li did not consent to such contact.

6 159. At all times relevant herein, Defendant PRC acted through its officials or
7 employees, who were acting within the scope of their office or employment.

8 160. At all times relevant herein, Defendant PRC acted pursuant to a conspiracy
9 between PRC officials and employees based at the PRC's Embassy and Consulates General in
10 the United States, Li Huahong, John Doe 1, and others. Those co-conspirators agreed to
11 suppress the activities of anyone protesting Xi Jinping, the PRC, or the CCP during the APEC
12 summit in San Francisco, including through the use of violence. As such, Defendant PRC is
13 jointly and severally liable with its co-conspirators for the damages incurred by Plaintiffs.

14 161. Alternatively, Defendant PRC aided and abetted the perpetrators of the assault,
15 including Li Huahong and John Doe 1. Defendant substantially assisted and encouraged these
16 acts by, *inter alia*, paying Li Huahong and John Doe 1 with knowledge that they would use
17 violence against Plaintiffs to suppress their protest.

18 162. Plaintiffs suffered harm.

19 163. Defendant directly and proximately caused, and Defendant's conduct was a
20 substantial factor in causing, Plaintiffs' harm.

21 **THIRD CAUSE OF ACTION**

22 **Battery**

23 **By Plaintiffs Li and Jia against Defendant PRC**

24 164. Plaintiff re-alleges and incorporates all allegations with the same force and effect
25 as if fully restated herein.

1 165. When Li Huahong grabbed onto Plaintiff Jia's banner, pulled Plaintiff Jia by the
2 hair, and caused her to collapse on the ground she intentionally touched Plaintiff Jia in a harmful
3 or offensive manner and Plaintiff Jia did not consent to this touching.

4 166. When PRC Employee 1 repeatedly pushed, grabbed, and shoved Mrs. Li he
5 intentionally touched Mrs. Li in a harmful or offensive manner and Mrs. Li did not consent to
6 this touching.

7 167. When John Doe 1 struck Mrs. Li in the head with a flagpole he intentionally
8 touched Mrs. Li in a harmful or offensive manner and Mrs. Li did not consent to this touching.

9 168. At all times relevant herein, Defendant PRC acted through its officials or
10 employees, who were acting within the scope of their office or employment.

11 169. At all times relevant herein, Defendant PRC acted pursuant to a conspiracy
12 between PRC officials and employees based at the PRC's Embassy and Consulates General in
13 the United States, Li Huahong, John Doe 1, and others. Those co-conspirators agreed to
14 suppress the activities of anyone protesting Xi Jinping, the PRC, or the CCP during the APEC
15 summit in San Francisco, including through the use of violence. As such, Defendant PRC is
16 jointly and severally liable with its co-conspirators for the damages incurred by Plaintiffs.

17 170. Alternatively, Defendant PRC aided and abetted the perpetrators of the batteries,
18 including Li Huahong and John Doe 1. Defendant substantially assisted and encouraged these
19 acts of violence by, *inter alia*, paying Li Huahong and John Doe 1 and identifying Mrs. Li as a
20 target, with knowledge that Li Huahong and John Doe 1 would use violence against Plaintiffs to
21 suppress their protest.

22 171. A reasonable person in Plaintiffs' position would have been offended by the
23 touching.

24 172. Plaintiffs suffered harm.

25 173. Defendant directly and proximately caused, and Defendant's conduct was a
26 substantial factor in causing, Plaintiffs' harm.

FOURTH CAUSE OF ACTION

Intentional Infliction of Emotional Distress

By Plaintiffs Li and Jia against Defendant PRC

174. Plaintiffs re-allege and incorporate all allegations with the same force and effect as if fully restated herein.

175. Defendant PRC and its co-conspirators intentionally caused severe emotional distress to Plaintiffs by their willful, wanton, extreme, and outrageous conduct, including but not limited to when Li Huahong violently suppressed Mrs. Jia's speech and protest and when PRC Employee 1 and John Doe 1 pushed and struck Mrs. Li to suppress her speech.

176. Defendant PRC and its co-conspirators recklessly caused or disregarded a substantial likelihood of causing severe emotional distress to Plaintiffs by their willful, wanton, extreme and outrageous conduct, including but not limited to when Li Huahong violently suppressed Mrs. Jia's speech and protest and when PRC Employee 1 and John Doe 1 pushed and struck Mrs. Li to suppress her speech.

177. Defendant PRC and its co-conspirators knew that Plaintiffs would be especially susceptible to emotional distress as both had faced brutal persecution by the PRC and they described that persecution in their protest before they were targeted or Defendant PRC was otherwise familiar with them due to their protest activities in the United States.

178. Defendant PRC and its co-conspirators' conduct was so outrageous in character and so extreme in degree that a reasonable member of the community would regard such conduct as atrocious, going beyond all possible bounds of decency and as being utterly intolerable in a civilized community.

179. Defendant PRC and its co-conspirators' conduct was carried out with malice, oppression, and/or fraud.

180. At all times relevant herein, Defendant PRC acted through its officers and employees, who were acting within the scope of their office or employment.

181. At all times relevant herein, Defendant PRC acted pursuant to a conspiracy between PRC officials and employees based at the PRC's Embassy and Consulates General in the United States, Li Huahong, John Doe 1, and others. Those co-conspirators agreed to suppress the activities of anyone protesting Xi Jinping, the PRC, or the CCP during the APEC summit in San Francisco, including through the use of violence. As such, Defendant PRC is jointly and severally liable with its co-conspirators for the damages incurred by Plaintiffs.

182. Alternatively, Defendant PRC aided and abetted the perpetrators of the torts, including Li Huahong and John Doe 1. Defendant substantially assisted and encouraged these torts by, *inter alia*, paying Li Huahong and John Doe 1 and identifying Mrs. Li as a target, with knowledge that Li Huahong and John Doe 1 would use violence against Plaintiffs to suppress their protest and inflict severe emotional distress on them.

183. Plaintiffs suffered severe emotional distress.

184. Defendant directly and proximately caused, and Defendant's conduct was a substantial factor in causing, Plaintiffs' harm.

PRAYER FOR RELIEF

Wherefore, Plaintiffs pray for a judgment against Defendant PRC as follows:

- A. For a declaratory judgment;
- B. For damages, in an amount to be determined according to proof;
- C. For an award of costs;
- D. For an award of reasonable attorney's fees;
- E. For any and all other relief the Court deems just and proper.

Dated: November 13, 2025

/s/ Matt Putterman
 Matt Putterman
 Cal. Bar No. 306845
 Putterman Law, APC
 5120 Campus Dr, Ste 250
 Newport, CA 92660-2101

1 matt@putterman-law.com
2 (949) 271-6382

3 Terri Marsh, DC Bar No. 447125,
4 application for admission *pro hac vice*
5 forthcoming
6 Matthew Griechen, DC Bar No. 1686982,
7 application for admission *pro hac vice*
8 forthcoming
9 Human Rights Law Foundation
10 1333 New Hampshire Ave. NW
11 Suite 204
12 Washington, DC 20036
13 terri.marsh.hrlf@gmail.com
14 (202) 774-0893
15 matthew.griechen.hrlf@gmail.com
16 (202) 847-5167

17 *Attorneys for Plaintiffs Junwei Jia and*
18 *Huanjun Li Kohe*