

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

SAUL MARTINEZ, SARAH MARTINEZ,)
MIRTHA POUNCE INDIVIDUALLY,)
AND FOR THE ESTATE OF ROLAND)
CALDERON, ROSA MILAGROS, SAUL)
RAUDA, YENY RAUDA, JASMYN)
RAUDA, EVELYN RAUDA, A.L.C, a)
minor, A.C., a minor, WENDY GREEN,)
J.W., a minor, CHAD WEIKEL, WENDY)
GREEN FOR THE ESTATE OF IAN)
WEIKEL, YARISSA TORRES,)
INDIVIDUALLY, AND FOR THE)
ESTATE OF TEODORO TORRES,)
NICHOLAS PAUPORE, MARIE)
PAUPORE, CODY PAUPORE, SHARON)
OSBORNE, THOMAS PAUPORE,)
LESLIE PAUPORE BUENO, M.P., a)
minor, BRIAN SAARISTO, CHERYL)
SAARISTO, SHIRLEY ANN SAARISTO,)
BRENDA ANGELL, BARBARA)
LIIMATAINEN, L.M.S., a minor, B.S., Jr.,)
a minor, LONNIE FORD, LINDA)
MATTISON-FORD, JESSICA MATSON,)
SHAWN FORD, LONNIE FORD FOR)
THE ESTATE OF JOSHUA A. FORD,)
KAREN THORNE, DOYLE THORNE,)
JOEY ROBINSON, KAREN THORNE)
FOR THE ESTATE OF WILLIAM)
THORNE, JOHN BOTTS, JENNIFER)
BOTTS, DARA BOTTS, JOHN STEPHEN)
"STEVE" BOTTS, ELIZABETH)
CUNNINGHAM, DIANE TRAYNOR)
SOWINSKI, JARED SOWINSKI, AUSTIN)
SOWINSKI, DIANE TRAYNOR)
SOWINSKI FOR THE ESTATE OF)
NICHOLAS SOWINSKI, SAMANTHA)
GAGE, M.G, a minor, RANDY GAGE,)
TAMARA GAGE, JULIA ROSA,)
SAMANTHA GAGE FOR THE ESTATE)
OF JOSEPH GAGE, JOSHUA COPE,)
ERICA COPE, PHILIP COPE, LINDA)
COPE, JACOB COPE, JONATHAN COPE,)
L.C., a minor, KAREN HUFFMAN, GARY)
HUFFMAN, TORIE HUFFMAN)

CASE NO.: 1:16-cv-02193-EGS

JURY TRIAL DEMANDED

MURPHY, KAREN HUFFMAN FOR THE)
ESTATE OF JASON HUFFMAN, TRAVIS)
VENDELA, MARIANNE VENDELA,)
NADIA CADAVERO, KRISTIA)
MARKARIAN, NADIA CADAVERO FOR)
THE ESTATE OF JONATHAN)
CADAVERO, JOHN MAYO, REBECCA)
MAYO, ANDY MAYO, JOHN MAYO)
FOR THE ESTATE OF BARRY W.)
MAYO, KATHY MOORE, THOMAS)
EDISON-MOORE, JR., KATHY MOORE)
FOR THE ESTATE OF RYAN D.)
RUSSELL, ERIN DRUCTOR,)
KATHLEEN STEPHENS, TRENT)
STEPHENS, SUMMER STEPHENS,)
RHETT STEPHENS, BRITTANI)
HOBSON, DEREK STEPHENS and ERIN)
DUCTOR FOR THE ESTATE OF)
BLAKE STEPHENS, JAKE HAMILTON)
ALTMAN, NADJA ALTMAN, J.A., a)
minor, L.A., a minor, GLORIA PROSSER,)
CHARLES ALTMAN, MICHAEL)
ALTMAN, LOUIS DAHLMAN, KAY)
STOCKDALE, LUCAS DAHLMAN,)
AMBER DAHLMAN, JULIE MONTANO,)
KEITH MODGLING, CHRISTOPHER)
MODGLING, KELLILYYN MODGLING,)
MICHELLE MODGLING, KENNETH)
SCHAFFER, JULIE MONTANO FOR THE)
ESTATE OF JOSHUA MODGLING,)
JEANNIE ZAPFE, JOSEPH ZAPFE,)
EDWARD ZAPFE, JEANNIE ZAPFE FOR)
THE ESTATE OF WILLIAM A. ZAPFE,)
CHELSEA ADAIR, A.A., a minor,)
CHELSEA ADAIR FOR THE ESTATE OF)
JAMES ADAIR, JOHN TAKAI, MAE)
TAKAI, PATRICIA L. CRUZE, JUAN L.)
TAKAI, JOLEAN TAKAI, J.T., a minor,)
N.T., a minor, K.T, a minor, I.T, a minor,)
JERMAINE TAKAI, CONSTANCE)
AHEARN, JAMES AHEARN SR., KEVIN)
AHEARN, CONSTANCE AHEARN FOR)
THE ESTATE OF JAMES AHEARN,)
ANTHONY LILL, CHARMAINE LILL,)
KORTNE JONES, SKYE OTERO, C.L, a)
minor, M.L., a minor, ANTHONY LILL)
AND ON BEHALF OF THE ESTATE OF)
ERIC LILL, JEAN KLINE, JOHN KLINE)
JR., BETTY JEAN KLINE FOR THE)
ESTATE OF KEITH KLINE, DEBBIE)

OTTE, DAVID KUBE, JONATHAN)
 KUBE, JESSICA KUBE, JASON KUBE,)
 JENNIFER KUBE, DAVID KUBE FOR)
 THE ESTATE OF CHRISTOPHER KUBE,)
 MARGARET WAKEMAN, DAVID)
 WAKEMAN, WILLIAM WAKEMAN,)
 MARGARET WAKEMAN FOR THE)
 ESTATE OF DUSTIN WAKEMAN,)
 MARY NEIBERGER, RICHARD)
 NEIBERGER, AMI NEIBERGER,)
 ROBERT NEIBERGER, ERIC)
 NEIBERGER, MARY NEIBERGER FOR)
 THE ESTATE OF CHRIS NEIBERGER,)
 JEAN REEVES, JAMES REEVES,)
 MICHAEL REEVES, JARED REEVES,)
 LESLIE HARDCASTLE, J.R., a minor,)
 LESLIE HARDCASTLE FOR THE)
 ESTATE OF JOSHUA REEVES, JOSHUA)
 WELLS, LYDIA LANTRIP, BILLIE)
 WELLS, JR., BLAKE LANTRIP, J.W., a)
 minor, JENNIFER RUBIO, N.R. a minor,)
 JENNIFER RUBIO FOR THE ESTATE OF)
 JOSE RUBIO-HERNANDEZ, DORIS)
 BENNETT, DEMPSEY BENNET,)
 DARNELL BENNETT, DORIS BENNET)
 FOR THE ESTATE OF DURRELL)
 BENNETT, MELINDA MIXON, WALTER)
 MIXON, KENNETH MIXON, KIMBERLY)
 SPILLYARDS, BETTY TIA MIXON,)
 T.R.M., a minor, TIA MIXON FOR THE)
 ESTATE OF JUSTIN MIXON, LISA)
 THOMPSON, LOWELL "KEITH")
 THOMPSON, BRENNAN CORBIN, LISA)
 THOMPSON FOR THE ESTATE OF)
 JOSHUA PLOCICA, JOHN)
 BLICKENSTAFF, MISTY)
 BLICKENSTAFF, PAM JONES, JARED)
 BLICKENSTAFF, ADRIANNE)
 BLICKENSTAFF, TRISTA CARTER, A.B.)
 a minor, M.B., a minor, C.B., a minor,)
 GARY L. HENRY, INDIVIDUALLY AND)
 ON BEHALF OF THE ESTATE OF GARY)
 HENRY, LORAMAY "LORA")
 DIAMOND, SALLY DIAMOND WILEY,)
 MICHAEL WILEY, JASON DIAMOND,)
 MICHAEL DIAMOND, TAYLOR M.)
 DIAMOND, MADISON J. DIAMOND,)
 A.D., a minor and S.D., a minor, CHERYL)
 ANAYA, TRISTA MOFFETT, CARMELO)
 ANAYA JR., CHERYL ANAYA FOR THE)

ESTATE OF MICHAEL ANAYA,)
CHARLENE WILCOX, BIANCA)
WILCOX, ONA WILCOX, CHARLES)
WILCOX III, CHARLENE WILCOX FOR)
THE ESTATE OF CARLOS WILCOX,)
MARIA VAZQUEZ, individually and for)
THE ESTATE OF OMAR VAZQUEZ,)
PABLO VAZQUEZ, PABLO VAZQUEZ,)
JR., MARISEL VAZQUEZ, JAVIER)
VAZQUEZ, JASON RZEPA,)
CASSANDRA RZEPA, ANN RZEPA,)
DAVID SHAIDELL, K.R., a minor, C.R, a)
minor, TIM BEYERS INDIVIDUALLY)
AND ON BEHALF OF THE ESTATE OF)
NATHAN R. BEYERS, SONJA BEYERS,)
VANESSA BEYERS, TYLER BEYERS,)
and E.B. a minor,)

Plaintiffs,)

v.)

ISLAMIC REPUBLIC OF IRAN)

Defendant.)

FIRST AMENDED COMPLAINT

I. NATURE OF THE ACTION

1. This is a civil action pursuant to the Foreign Sovereign Immunities Act, 28 U.S.C. §1605A (hereinafter “FSIA”) for wrongful death, personal injury and related torts, by the estates and families of United States nationals and/or members of the U.S. armed forces (as defined in 10 U.S.C. §101) who were killed or injured by Iran and/or its agents in Iraq from 2004 to 2011.

2. Iran’s aforementioned agents included the U.S.-designated Foreign Terrorist Organization (as that term is defined in 8 U.S.C. §1189 of the Antiterrorism and Effective Death Penalty Act of 1996 (“AEDPA”)) Hezbollah; the Islamic Revolutionary Guard Corps (“IRGC”), whose subdivision known as the Islamic Revolutionary Guard Corps-Qods Force (“IRGC-QF”) is a U.S.-designated Specially Designated Global Terrorist; and other terrorist agents that included a litany of Iraqi Shi’a terror groups referred to herein collectively as “Special Groups.”

3. The United States officially designated Iran a State Sponsor of Terrorism on

4. The United States designated Hezbollah a Specially Designated Terrorist on January 25, 1995. Hezbollah was designated a Foreign Terrorist Organization by the United States on October 8, 1997, and it has retained that designation since that time. Hezbollah was designated a Specially Designated Global Terrorist by the United States on October 31, 2001, pursuant to E.O. 13224.

II. JURISDICTION AND VENUE

5. This Court has jurisdiction over this matter and over Defendant pursuant to 28 U.S.C. §§1330(a), 1330(b), 1331, 1332(a)(2) and 1605A(a)(1), which create subject-matter and personal jurisdiction for civil actions for wrongful death and personal injury against State Sponsors of Terrorism and their officials, employees and agents.

6. 28 U.S.C. §1605A(c) provides a federal private right of action against a foreign state that is or was a State Sponsor of Terrorism, and also against any official, employee or agent of that foreign state while acting within the scope of his or her office, employment or agency, for wrongful death, personal injury and related torts.

7. Venue is proper in this district pursuant to 28 U.S.C. §1391(f).

III. THE DEFENDANT

8. At all times relevant to this Complaint, Defendant Iran is and was a foreign state within the meaning of 28 U.S.C. §1603 and designated a State Sponsor of Terrorism pursuant to §6(j) of the Export Administration Act of 1979 (50 U.S.C. App. §2405(j)).

9. Iran provided material support and resources for the commission of acts of extrajudicial killing, within the meaning of 28 U.S.C. §1605A, including the terrorist attacks in which Plaintiffs were killed, injured or maimed, and performed actions that caused the terrorist attacks and the harm to Plaintiffs herein.

10. The Government of Iran is politically and ideologically hostile to the United

States and its allies, and has consistently provided material support for acts of international terrorism, including extrajudicial killings, torture and hostage takings, particularly through its Islamic Revolutionary Guard Corps and its Lebanese proxy, Hezbollah.

11. The Islamic Revolutionary Guard Corps (“IRGC”) is nominally comprised of five branches (Ground Forces, Air Force, Navy, Basij militia, and Qods Force special operations (“IRGC-QF”)) in addition to a counterintelligence directorate and representatives of the Supreme Leader. Several of the IRGC’s leaders have been sanctioned under U.N. Security Council Resolution 1747.

12. According to the U.S. State Department’s 2005 Country Reports on Terrorism: “[t]he IRGC was increasingly involved in supplying lethal assistance to Iraqi militant groups, which destabilizes Iraq ... Senior Iraqi officials have publicly expressed concern over Iranian interference in Iraq, and there were reports that Iran provided funding, safe passage, and arms to insurgent elements.”

13. The IRGC-QF’s “Department 2000” manages Iran’s relationship with Hezbollah, which includes the flow of some of Iran’s most sophisticated weapon systems, including military grade Explosively Formed Penetrators (“EFPs”), anti-tank guided missiles, and various rockets, such as the Fajr-5.

14. Explosively Formed Penetrators were used to injure and kill Plaintiffs. Such bombs are sometimes inaccurately called “improvised explosive devices” (“IEDs”); in reality, the Explosively Formed Penetrators were not “improvised” but professionally manufactured and specifically designed by Iran and its agents to target U.S. and Coalition Forces’ armor.

15. In October 2007, the IRGC-QF was designated a Specially Designated Global Terrorist (“SDGT”) pursuant to E.O. 13324 for its terrorism-related activities. The U.S. Treasury Department’s press release announcing the designation noted that:

The Qods Force has had a long history of supporting Hezbollah [sic]’s military, paramilitary, and terrorist activities, providing it

Case 1:16-cv-02193-EGS Document 5 Filed 01/24/17 Page 7 of 64
with guidance, funding, weapons, intelligence, and logistical support. The Qods Force operates training camps for Hezbollah [sic] in Lebanon's Bekaa Valley and has reportedly trained more than 3,000 Hezbollah [sic] fighters at IRGC training facilities in Iran. The Qods Force provides roughly \$100 to \$200 million in funding a year to Hezbollah [sic] and has assisted Hezbollah [sic] in rearming in violation of UN Security Council Resolution 1701.

In addition, the Qods Force provides lethal support in the form of weapons, training, funding, and guidance to select groups of Iraqi Shi'a militants who target and kill Coalition and Iraqi forces and innocent Iraqi civilians. (Emphasis added.)

IV. IRAN'S MATERIAL SUPPORT TO ACTS OF TERRORISM IN IRAQ 2004-2011

A. ISLAMIC REVOLUTIONARY GUARD CORPS - QODS FORCE IN IRAQ

16. Even before the U.S. invasion of Iraq in 2003, the IRGC-QF had long cultivated ties to Shi'a opposition groups opposed to Saddam Hussein's brutal regime, including the Badr Corps that was headquartered in Iran throughout Iraq in the 1990s.

17. During that time, the Badr Corps smuggled men and weapons into Iraq to conduct attacks against the Hussein regime.

18. Before 2003, the Badr Corps served as Iran's most important surrogate inside Iraq, acting as a *de facto* arm of the IRGC-QF.

19. After Saddam Hussein's overthrow in 2003, the Badr Corps renamed itself the Badr Organization, and many of its operatives joined the newly formed Iraqi security forces.

20. Published reports indicate that thousands of members of the Badr Organization remained on the IRGC-QF payroll after 2004.

21. Several senior Badr Corps operatives later emerged as key conduits for funneling weapons to Iranian proxies in Iraq from 2004-2011, including Abu Mustafa al-Sheibani, a key smuggler of deadly Iranian IEDs, and Jamal Ja'far Muhammad, a/k/a Abu Mahdi al-Muhandis (a.k.a. "The Engineer"), who later led Kata'ib Hezbollah.

22. "Department 1000" of the IRGC-QF, known as the Ramezan Corps, was in charge of Iraq operations and remains the largest Qods Force command outside of Iran. It

23. Although the Badr Organization evolved into a major political organization with seats in the new Iraqi parliament, it also played a significant role in facilitating Special Groups operations in Iraq.

24. A segment of senior Special Groups commanders such as Al-Muhandis are, or were, initially Badr Corps personnel.

25. President Bush declared on May 1, 2003, that “major combat operations in Iraq have ended.”

26. On May 23, 2003, the Coalition Provisional Authority established as the interim government for Iraq disbanded the Iraqi military forces.

27. The U.N. Security Council authorized the post-conflict occupation of Iraq by Coalition Forces in October 2003 to maintain “security and stability.” S.C. Res. 1511, para. 13, U.N. Doc. S/RES/1511 (Oct. 16, 2003).

28. Although U.S. policy (supported by U.N. Security Council resolutions) was to establish peace and stability in Iraq in the hopes of establishing a democratic government, Iran viewed the U.S. peacekeeping efforts in Iraq as a potential threat to its regime.

29. Rather than engage in armed conflict with the U.S. or other Coalition Forces, Iran chose to undermine U.S. peacekeeping efforts by supporting terrorism and sectarian violence in Iraq.

30. After 2003, the IRGC inserted hundreds of its Iranian-trained operatives into Iraq’s state security organs (notably the Ministry of Interior intelligence structure) in part through its influence within the Badr Organization.

31. In addition to its coordination with the Badr Organization, the Ramezan Corps also cultivated, armed, trained and supported several Shi’a terror groups in Iraq that the U.S. military later termed “Special Groups.”

32. Although a June 7, 2004 U.N. Security Council Resolution (S.C. Res. 1546, U.N. Doc. S/RES/1546) expressly assigned Coalition Forces in Iraq the task of helping Iraq “*by preventing and deterring terrorism,*” Iran set out to target Coalition Forces and force them out of Iraq.

33. In sum, from October 16, 2003 onward, even though U.S. military personnel in Iraq were participants in an internationally recognized peace keeping mission, Iran embarked on a policy of terrorism, murder, kidnapping and torture to thwart those efforts.

34. Iran opposed U.S. peacekeeping efforts and initiated acts of international terrorism against American military personnel, Coalition Forces and Iraqi citizens with the goals of destabilizing Iraq and increasing Iranian influence in that country.

35. Iran, through its authorized agents and instrumentalities acting within the scope of their employment, agency and direction from Iran, provided material support and/or resources that facilitated acts of torture, extrajudicial killing and hostage taking that caused personal injury or death to more than one thousand Americans in Iraq.

36. In particular, Iranian agents developed and cultivated Shi’a Special Groups, providing training in the use of Explosively Formed Penetrators, Improvised Rocket Assisted Munitions, rocket-propelled grenades, sniper fire and mortars and operational and computer security.

B. SHI’A “SPECIAL GROUPS”

1. JAYSH AL MAHDI and the PROMISED DAY BRIGADES

37. Jaysh al Mahdi (the “Mahdi Army” or “JAM”) was established by radical Shi’a cleric Muqtada al-Sadr in June 2003.

38. Like the Badr Organization, it received support and training from the IRGC.

39. On April 18, 2004 it led the first major armed confrontation against U.S.-led forces in Iraq from the Shi’a community.

40. Jaysh al Mahdi was co-founded by Imad Mughniyah, one of Hezbollah's senior commanders, acting under the direction of Iran.

41. Jaysh al Mahdi expanded its territorial control of mixed or predominantly Shi'a neighborhoods and displaced or killed the local Sunni population. JAM was able to gain initial control in many of the neighborhoods surrounding Baghdad (including "Sadr City") by offering the Shi'a population protection and social services.

42. Al-Sadr purportedly dissolved part of his militia after 2007, but he maintained a small group of Iranian-supported terrorists called the Promised Day Brigades to carry out attacks against Coalition Forces.

43. The Promised Day Brigades received funding, training and weapons from the IRGC.

44. The Promised Day Brigades actively targeted U.S. forces in an attempt to disrupt security operations and further destabilize Iraq. For example, on June 28, 2011 the Promised Day Brigades issued a statement claiming responsibility for 10 mortar and Katyusha rocket attacks against U.S. military convoys in which U.S. officials confirmed that three U.S. troops were killed.

2. KATA'IB HEZBOLLAH

45. For many years, Kata'ib Hezbollah functioned as Iran's go-to terrorist group in Iraq and received support from Lebanese Hezbollah, including training in weapons use; IED construction and operation; and sniper, rocket, and mortar attacks.

46. Historically, Kata'ib Hezbollah operated mainly in Shi'a areas of Baghdad, such as Sadr City, and throughout the south.

47. On June 24, 2009 the United States designated Kata'ib Hezbollah a Foreign Terrorist Organization.

48. The State Department's notice of Kata'ib Hezbollah's designation stated:

The organization has been responsible for numerous violent terrorist attacks since 2007, including improvised explosive device bombings, rocket propelled grenade attacks, and sniper operations. Kata'ib Hezbollah also targeted the International Zone in Baghdad in a November 29, 2008 rocket attack that killed two UN workers. In addition, KH has threatened the lives of Iraqi politicians and civilians that support the legitimate political process in Iraq.

49. Kata'ib Hezbollah was also simultaneously designated a Specially Designated Global Terrorist because it was “responsible for numerous terrorist acts against Iraqi, U.S., and other targets in Iraq since 2007.”

50. The Treasury Department’s press release announcing Kata'ib Hezbollah’s designation explained that Kata'ib Hezbollah had “committed, directed, supported, or posed a significant risk of committing acts of violence against Coalition and Iraqi Security Forces.”

51. The press release also quoted then-Under Secretary for Terrorism and Financial Intelligence Stuart Levey as stating: “the IRGC-Qods Force provides lethal support to Kata'ib Hezbollah and other Iraqi Shia militia groups who target and kill Coalition and Iraqi Security Forces.”

52. The press release further reported that between March 2007 and June 2008, Kata'ib Hezbollah led a number of attacks against U.S. forces in Iraq, advising: “[a]s of 2008, Kata'ib Hezbollah was funded by the IRGC-Qods Force and received weapons training and support from Lebanon-based Hezbollah. In one instance, Hezbollah provided training-- to include building and planting IEDs and training in coordinating small and medium arms attacks, sniper attacks, mortar attacks, and rocket attacks--to Kata'ib Hezbollah members in Iran.”

53. Furthermore, the press release noted:

Recordings made by Kata'ib Hezbollah for release to the public as propaganda videos further demonstrate that Kata'ib Hezbollah conducted attacks against Coalition Forces. In mid- August 2008, Coalition Forces seized four hard drives from a storage facility associated with a Kata'ib Hezbollah media facilitator. The four hard drives included approximately 1,200 videos showing Kata'ib Hezbollah’s sophisticated planning and attack tactics, techniques, and procedures, and Kata'ib Hezbollah’s use of the most lethal

One of the hard drives contained 35 attack videos edited with the Kata'ib Hezbollah logo in the top right corner. Additionally, between February and September 2008, Al-Manar in Beirut, Lebanon, broadcast several videos showing Kata'ib Hezbollah conducting multiple attacks against Coalition Forces in Iraq.

Immediately preceding the Government of Iraq's approval of the United States-Iraq security agreement in late November 2008, Kata'ib Hezbollah posted a statement that the group would continue fighting Coalition Forces and threatened to conduct attacks against the Government of Iraq if it signed the security agreement with the United States.

54. In 2008, the U.S. Department of Defense stated that Kata'ib Hezbollah, "also known as Hezbollah Brigades, is a terrorist group believed to receive funding, training, logistics and material support from Iran to attack Iraqi and coalition forces using what the military calls 'explosively formed penetrators' – roadside bombs designed to pierce armor-hulled vehicles – and other weapons such as rocket-assisted mortars."

55. Kata'ib Hezbollah's leadership includes Abu Mahdi al-Muhandis (real name: Jamal al-Ibrahimi), a long-standing member of the Badr Organization who lived for many years in Iran.

56. Al-Muhandis is wanted in Kuwait for his alleged role in the 1983 bombings of the American and French embassies in Kuwait City, as well as for his alleged involvement in the assassination attempt on the Kuwaiti Emir in 1985.

57. Al-Muhandis was designated a Specially Designated Global Terrorist in July 2009 on the same day Kata'ib Hezbollah was so designated. The press release noted:

As of early 2007, al-Muhandis formed a Shia militia group employing instructors from Hezbollah to prepare this group and certain Jaysh al-Mahdi (JAM) Special Groups for attacks against Coalition Forces. The groups received training in guerilla warfare, handling bombs and explosives, and employing weapons-to include missiles, mortars, and sniper rifles. In another instance as of September 2007, al-Muhandis led networks that moved ammunition and weapons--to include explosively formed penetrators (EFPs)--

from Iran to Iraq, distributing them to certain JAM militias to target Coalition Forces. As of mid-February 2007, al-Muhandis also ran a weapons smuggling network that moved sniper rifles through the Iran-Iraq border to Shia militias that targeted Coalition Forces.

Al-Muhandis also provided logistical support for attacks against Iraqi Security Forces and Coalition Forces conducted by JAM Special Groups and certain Shia militias. In one instance, in April 2008, al-Muhandis facilitated the entry of trucks--containing mortars, Katyusha rockets, EFPs, and other explosive devices-- from Iran to Iraq that were then delivered to JAM Special Groups in Sadr City, Baghdad. Additionally, al-Muhandis organized numerous weapons shipments to supply JAM Special Groups who were fighting Iraqi Security Forces in the Basrah and Maysan provinces during late March-early April 2008.

In addition to facilitating weapons shipments to JAM Special Groups and certain Shia militias, al-Muhandis facilitated the movement and training of Iraq-based Shia militia members to prepare them to attack Coalition Forces. In one instance in November 2007, al-Muhandis sent JAM Special Groups members to Iran to undergo a training course in using sniper rifles. Upon completion of the training course, the JAM Special Groups members had planned to return to Iraq and carry out special operations against Coalition Forces. Additionally, in early March 2007, al-Muhandis sent certain Shia militia members to Iran for training in guerilla warfare, light arms, marksmanship, improvised explosive devices (IED) and anti-aircraft missiles to increase the combat ability of the militias to fight Coalition Forces.

In addition to the reasons for which he is being designated today, al-Muhandis participated in the bombing of Western embassies in Kuwait and the attempted assassination of the Emir of Kuwait in the early 1980s. Al-Muhandis was subsequently convicted in absentia by the Kuwaiti government for his role in the bombing and attempted assassination.

58. In a July 2010 press briefing, U.S. General Ray Odierno described Kata'ib Hezbollah as "clearly connected to Iranian IRGC [Iranian Revolutionary Guard Corps]."

3. ASA'IB AHL AL-HAQ ("LEAGUE OF THE RIGHTEOUS")

59. Asa'ib Ahl al-Haq is a Shi'a Special Group supported by Hezbollah and the IRGC-QF that has conducted assassinations and operations against Iraqi civilians, Iraqi Security Forces and Coalition Forces.

60. Asa'ib Ahl al-Haq was originally established by a follower of Muqtada al-Sadr

61. His brother, Laith Khazali, also helped lead the organization.

62. Asa'ib Ahl al-Haq split from al-Sadr's Jaysh al Mahdi in 2006. Since that time, Asa'ib Ahl al-Haq conducted thousands of IED attacks against U.S. and Iraqi forces; targeted kidnappings of Westerners; launched rocket and mortar attacks on the U.S. Embassy; murdered American soldiers; and assassinated Iraqi officials.

63. At all relevant times, Asa'ib Ahl al-Haq received significant funding, training and arms from Iran, and closely coordinated with Iran's IRGC-QF and Hezbollah.

64. In particular, Lebanese Hezbollah operative Ali Musa Daqduq provided training to Asa'ib Ahl al-Haq terrorists.

65. Hezbollah and the IRGC-QF provided Jaysh al Mahdi, the Promised Day Brigades, Kata'ib Hezbollah, Asa'ib Ahl al-Haq and other Shi'a groups with a variety of weapons used to target U.S. and Coalition Forces engaged in their post-2003 peacekeeping mission.

66. These weapons included signature Iranian munitions such as Explosively Formed Penetrators and Improvised Rocket Assisted Munitions, as well as 107 mm rockets (often used as part of IRAMs), 120 mm and 60 mm mortars, RPG launchers and other small arms.

C. EXPLOSIVELY FORMED PENETRATORS

67. One of Iran's primary forms of material support and/or resources that facilitated extrajudicial killings of U.S. citizens in Iraq was the financing, manufacturing and deployment of Explosively Formed Penetrators.

68. As noted above, the EFPs deployed by the IRGC and Hezbollah in Iraq were not truly "improvised" explosive devices but professionally manufactured and specifically designed to target U.S. and Coalition Forces' armor.

69. EFPs constitute "weapons of mass destruction" as that term is defined in 18

70. First used by Hezbollah against Israeli armor in Lebanon, EFPs are known as shaped charges, usually made with a manufactured concave copper disk and a High Explosive packed behind the liner.

71. In Iraq, EFPs were often triggered by a passive infra-red device that set off the explosion within the EFP's casing, forcing the copper disk forward and turning it into a high velocity slug that could pierce most military-grade armor.

72. To produce these weapons, copper sheets are often loaded onto a punch press to yield copper discs. These discs are annealed in a furnace to soften the copper. The discs are then loaded into a large hydraulic press and formed into the disk-like final shape.

73. EFPs are far more sophisticated than homemade explosive devices such as traditional improvised explosive devices, and they are designed specifically to target vehicles such as armored patrols and supply convoys, though Hezbollah and the Special Groups have deployed them against U.S. and Iraqi civilians as well.

74. Although Iran's use of EFPs was publicly disclosed by U.S. and British officials in 2005, the official identification of *specific* attacks as EFP attacks was not first publicly disclosed until 2010.

75. In 2006, the U.S. State Department's Country Reports on Terrorism further documented Iran's specific efforts to provide terrorists with lethal EFPs to ambush and murder U.S. and other Coalition Forces:

Iranian government forces have been responsible for at least some of the increasing lethality of anti-Coalition attacks by providing Shia militants with the capability to build IEDs with explosively formed projectiles similar to those developed by Iran and Lebanese Hezbollah [sic]. The Iranian Revolutionary Guard was linked to armor-piercing explosives that resulted in the deaths of Coalition Forces. The Revolutionary Guard, along with Lebanese Hezbollah [sic], implemented training programs for Iraqi militants in the construction and use of sophisticated IED technology. *These individuals then passed on this training to additional militants in*

76. Also in 2006, Brigadier Gen. Michael Barbero, Deputy Chief of Staff for Strategic Operations of the Multi-National Force – Iraq stated: “Iran is definitely a destabilizing force in Iraq. I think it’s irrefutable that Iran is responsible for training, funding and equipping some of these Shi’a extremist groups and also providing advanced IED technology to them, and there’s clear evidence of that.”

77. Brigadier Gen. Kevin Bergner commented on Iran funding of Hezbollah operatives in Iraq:

Actions against these Iraqi groups have allowed coalition intelligence officials to piece together the Iranian connection to terrorism in Iraq [...] Iran's Quds Force, a special branch of Iran's Revolutionary Guards, is training, funding and arming the Iraqi groups. [...] It shows how Iranian operatives are using Lebanese surrogates to create Hezbollah-like capabilities. And it paints a picture of the level of effort in funding and arming extremist groups in Iraq.... The groups operate throughout Iraq. They planned and executed a string of bombings, kidnappings, sectarian murders and more against Iraqi citizens, Iraqi forces and coalition personnel. They receive arms -- including explosively formed penetrators, the most deadly form of improvised explosive device - - and funding from Iran. They also have received planning help and orders from Iran.

78. In May 2007, the Commander of the Multinational Division-Center, U.S. Army Major General Richard Lynch, commented that “[m]ost of our casualties have come from improvised explosive devices. That’s still the primary threat to our soldiers -- IEDs. And we have an aggressive campaign to counter those IEDs, but they still are taking a toll on our soldiers: 13 killed, 39 soldiers wounded. *What we’re finding is that the technology and the financing and the training of the explosively formed penetrators are coming from Iran.* The EFPs are killing our soldiers, and we can trace that back to Iran.” (emphasis added.)

79. According to the U.S. State Department’s 2007 Country Reports on Terrorism:

Despite its pledge to support the stabilization of Iraq, Iranian authorities continued to provide lethal support, including weapons, training, funding, and guidance, to some Iraqi militant groups that target Coalition and Iraqi security forces and Iraqi civilians. In this way, Iranian government forces have been responsible for attacks on Coalition forces. The Islamic Revolutionary Guard Corps (IRGC)-Quds Force, continued to provide Iraqi militants with Iranian-produced advanced rockets, sniper rifles, automatic weapons, mortars that have killed thousands of Coalition and Iraqi Forces, and explosively formed projectiles (EFPs) that have a higher lethality rate than other types of improvised explosive devices (IEDs), and are specially designed to defeat armored vehicles used by Coalition Forces. The Quds Force, in concert with Lebanese Hezbollah, provided training outside Iraq for Iraqi militants in the construction and use of sophisticated IED technology and other advanced weaponry. These individuals then passed on this training to

Case 1:16-cv-02193-EGS Document 5 Filed 01/24/17 Page 18 of 64
additional militants inside Iraq, a “train- the-trainer” program. In addition, the Qods Force and Hezbollah have also provided training inside Iraq. In fact, Coalition Forces captured a Lebanese Hezbollah operative in Iraq in 2007.

80. Other U.S. Government reports, such as the Department of Defense’s December 2007 “Measuring Stability and Security in Iraq” quarterly report to Congress, similarly concluded that:

Iranian Islamic Revolutionary Guard Corps - Qods Force (IRGC-QF) efforts to train, equip, and fund Shi’a extremists also continue despite reported assurances to Prime Minister Maliki that Iran will cease lethal aid.

81. These observations continued in 2008. According to the U.S. State Department’s 2008 Country Reports on Terrorism:

The Qods Force, an elite branch of the Islamic Revolutionary Guard Corps (IRGC), is the regime’s primary mechanism for cultivating and supporting terrorists abroad. The Qods Force provided aid in the form of weapons, training, and funding to HAMAS and other Palestinian terrorist groups, Lebanese Hezbollah, Iraq-based militants, and Taliban fighters in Afghanistan ...

Despite its pledge to support the stabilization of Iraq, Iranian authorities continued to provide lethal support, including weapons, training, funding, and guidance, to Iraqi militant groups that targeted Coalition and Iraqi forces and killed innocent Iraqi civilians. Iran’s Qods Force continued to provide Iraqi militants with Iranian-produced advanced rockets, sniper rifles, automatic weapons, and mortars that have killed Iraqi and Coalition Forces as well as civilians. Tehran was responsible for some of the lethality of anti-Coalition attacks by providing militants with the capability to assemble improvised explosive devices (IEDs) with explosively formed projectiles (EFPs) that were specially designed to defeat armored vehicles. The Qods Force, in concert with Lebanese Hezbollah, provided training both inside and outside of Iraq for Iraqi militants in the construction and use of sophisticated IED technology and other advanced weaponry.

D. IMPROVISED ROCKET ASSISTED MUNITIONS (IRAMs)

82. Along with EFPs, Improvised Rocket Assisted Munitions were a signature weapon of Shi'a militias in Iraq that were supplied by the Iranian Revolutionary Guard Corps.

83. An IRAM is a rocket-fired improvised explosive device made from a large metal canister – such as a propane gas tank – filled with explosives, scrap metal and ball bearings and propelled by rockets, most commonly 107 mm rockets launched from fixed or mobile sites by remote control. They are designed to cause catastrophic damage and inflict mass casualties

84. According to The Joint Improvised Explosive Device Defeat Organization (JIEDDO) of the U.S. Department of Defense, IRAMs were first introduced by Iran in November 2007 against U.S. personnel in Iraq.

85. Although Iran's use of IRAMs was publicly disclosed by U.S. officials after their introduction in 2007, systematic identification of *specific* attacks as IRAM attacks was not publicly disclosed until 2010.

86. IRAM attacks occurred primarily in Baghdad and in the Shi'a dominated areas in southern Iraq, where Iranian-backed militias primarily operate.

87. All of the foregoing support from Iran and its agents for attacks on Coalition Forces and Iraqi civilians was financed and facilitated in substantial part by material support in the form of funds transfers initiated by Iran through Iranian banks on behalf of and for the benefit of Hezbollah and other agents of Iran's IRGC.

V. THE PLAINTIFFS

ATTACK 1: APRIL 12, 2006 - MISIAB, IRAQ

A. The Calderon Family

88. Roland Calderon was a citizen of the United States when he was killed in Iraq.

89. On April 12, 2006, Roland Calderon, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

90. Roland Calderon was killed in the attack.

91. The weapon used to kill Roland Calderon was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

92. Plaintiff Mirtha Ponce is a citizen of the United States and domiciled in the State of Georgia. She is the widow of Roland Calderon.

93. Plaintiff A.L.C., a minor, represented by his legal guardian Mirtha Pounce, is a citizen of the United States and domiciled in the State of Georgia. He is the son of Roland Calderon.

94. Plaintiff, A.D.C, a minor, represented by her legal guardian Mirtha Pounce, is a citizen of the United States and domiciled in the State of Georgia. She is the daughter of Roland Calderon.

95. Plaintiff Rosa Milagros is a citizen of the United States and domiciled in the State of Florida. She is the mother of Roland Calderon.

96. Plaintiff Saul Rauda is a citizen of the United States and domiciled in the State of Florida. He is the step-father of Ronald Calderon.

97. Plaintiff Yeny Rauda is a citizen of the United States and domiciled in the State of Florida. She is the sister of Roland Calderon.

98. Plaintiff Jasmyn Rauda is a citizen of the United States and domiciled in the State of Florida. She is the sister of Roland Calderon.

99. Plaintiff Evelyn Rauda is a citizen of the United States and domiciled in the State of Florida. She is the sister of Roland Calderon.

100. Plaintiff Mirtha Ponce brings an action individually and on behalf of the Estate of Roland Calderon, as its legal representative.

101. As a result of the attack, and the death of Roland Calderon, Plaintiffs Mirtha Ponce, A.L.C., a minor, A.D.C., a minor, Rosa Milagros, Saul Rauda, Yeny Rauda, Jasmyn Rauda, and

Case 1:16-cv-02193-EGS Document 5 Filed 01/24/17 Page 21 of 64
Evelyn Rauda have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband, father, son and brother's society, companionship, comfort, advice and counsel.

ATTACK 2: APRIL 18, 2006 - BALAD, IRAQ

B. The Weikel Family

102. Ian Weikel was a citizen of the United States when he was killed in Iraq.

103. On April 18, 2006, Ian Weikel was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

104. Ian Weikel was killed in the attack.

105. The weapon used to kill Ian Weikel was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

106. Plaintiff Wendy Green is a citizen of the United States and domiciled in the State of Minnesota. She is the widow of Ian Weikel.

107. Plaintiff J.W., a minor represented by his legal guardian Wendy Green, is a citizen of the United States and domiciled in the State of Minnesota. He is the son of Ian Weikel.

108. Plaintiff Chad Weikel is a citizen of the United States and domiciled in the State of Colorado. He is the brother of Ian Weikel.

109. Plaintiff Wendy Green brings an action individually and on behalf of the Estate of Ian Weikel, as its legal representative.

110. As a result of the attack, and the death of Ian Weikel, Plaintiffs Wendy Green, J.W., a minor and Chad Weikel have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband, father and brother's society, companionship, comfort, advice and counsel.

ATTACK 3: MAY 5, 2006 - BAGHDAD, IRAQ

C. The Torres Family

111. Teodoro Torres was a citizen of the United States when he was killed in Iraq.

112. On May 5, 2006, Teodoro Torres, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

113. Teodoro Torres was killed in the attack.

114. The weapon used to kill Teodoro Torres was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

115. Plaintiff Yarissa Torres is a citizen of the United States and domiciled in the State of New York. She is the widow of Teodoro Torres.

116. Plaintiff Yarissa Torres brings an action individually and on behalf of the Estate of Teodoro Torres, as its legal representative.

117. As a result of the attack, and the death of Teodoro Torres, Plaintiff Yarissa Torres has experienced severe mental anguish, extreme emotional pain and suffering, and the loss of her husband's society, companionship, comfort, advice and counsel.

ATTACK 4: JULY 2, 2006 - IRAQ

D. The Paupore Family

118. Plaintiff Nicholas Paupore is a citizen of the United States and domiciled in the State of Virginia.

119. On July 2, 2006, Plaintiff Nicholas Paupore, was serving in the U.S. military in Iraq.

120. Plaintiff Nicholas Paupore was injured when an EFP exploded near his vehicle.

121. The weapon used to injure Plaintiff Nicholas Paupore was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

122. As a result of the attack, Plaintiff Nicholas Paupore has lost his right leg, above the knee.

123. As a result of the attack, and the injuries he suffered, Plaintiff Nicholas Paupore has experienced severe physical and mental anguish and extreme emotional pain and suffering.

124. Plaintiff Marie Paupore is a citizen of the United States and domiciled in the State of Virginia. She is the wife of Nicholas Paupore.

125. Plaintiff Sharon Osborne is a citizen of the United States and domiciled in the State of Michigan. She is the mother of Nicholas Paupore.

126. Plaintiff Thomas Paupore is a citizen of the United States and domiciled in the State of Arizona. He is the father of Nicholas Paupore.

127. Plaintiff Leslie Paupore Bueno is a citizen of the United States and domiciled in the State of Arizona. She is the sister of Nicholas Paupore.

128. Plaintiff M.P., a minor represented by her legal guardian, Nicholas Paupore, is a citizen of the United States and domiciled in the State of Virginia. She is the daughter of Nicholas Paupore.

129. Plaintiff Cody Paupore is a citizen of the United States and domiciled in the State of Virginia. He is the son of Nicholas Paupore.

130. As a result of the attack, and the injuries suffered by Nicholas Paupore, Plaintiffs Nicholas Paupore, Marie Paupore, M.P., a minor, Cody Paupore, Sharon Osborne, Thomas Paupore, and Leslie Paupore Bueno have experienced severe mental anguish and extreme emotional pain and suffering.

E. The Saaristo Family

131. Plaintiff Brian Saaristo is a citizen of the United States and domiciled in the State of Minnesota.

132. On July 2, 2006, Plaintiff Brian Saaristo, was serving in the U.S. military in Iraq.

133. Plaintiff Brian Saaristo was injured when an EFP exploded near his vehicle.

134. The weapon used to injure Plaintiff Brian Saaristo was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

135. As a result of the attack, Plaintiff Brian Saaristo lost both of his legs.

136. As a result of the attack, and the injuries he suffered, Plaintiff Brian Saaristo has experienced severe physical and mental anguish and extreme emotional pain and suffering.

137. Plaintiff Cheryl Saaristo is a citizen of the United States and domiciled in the State of Minnesota. She is the wife of Brian Saaristo.

138. Plaintiff Shirley Ann Saaristo is a citizen of the United States and domiciled in the State of Minnesota. She is the mother of Brian Saaristo.

139. Plaintiff Brenda Angell is a citizen of the United States and domiciled in the State of Minnesota. She is sister of Brian Saaristo.

140. Plaintiff Barbara Liimatainen is a citizen of the United States and domiciled in the State of Minnesota. She is the sister of Brian Saaristo.

141. Plaintiff L.M.S., a minor represented by her father, Brian Saaristo, is a citizen of the United States and domiciled in the State of Minnesota. She is the daughter of Brian Saaristo.

142. Plaintiff B.S., Jr., a minor represented by his father, Brian Saaristo, is a citizen of the United States and domiciled in the State of Minnesota. He is the son of Brian Saaristo.

143. As a result of the attack, and the injuries suffered by Brian Saaristo, Plaintiffs Cheryl Saaristo, Shirley Ann Saaristo, Brenda Angell, Barbara Liimatainen, L.M.S., a minor, and B.S., Jr., a minor, have experienced severe mental anguish and extreme emotional pain and suffering.

ATTACK 5: JULY 31, 2006 – AL NUMANIYAH, IRAQ

F. The Ford Family

144. Joshua Ford was a citizen of the United States when he was killed in Iraq.

145. On July 31, 2006, Joshua Ford, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

146. Joshua Ford was killed in the attack.

147. The weapon used to kill Joshua Ford was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

148. Plaintiff Lonnie Ford is a citizen of the United States and domiciled in the State of Nebraska. He is the father of Joshua Ford.

149. Plaintiff Linda Mattison-Ford is a citizen of the United States and domiciled in the State of Nebraska. She is the step-mother of Joshua Ford.

150. Plaintiff Jessica Matson is a citizen of the United States and domiciled in the State of Nebraska. She is the sister of Joshua Ford.

151. Plaintiff Shawn Ford is a citizen of the United States and domiciled in the State of Nebraska. She is the sister of Joshua Ford.

152. Plaintiff Lonnie Ford brings an action individually and on behalf of the Estate of Joshua Ford, as its legal representative.

153. As a result of the attack, and the death of Joshua Ford, Plaintiffs, Lonnie Ford, Linda Mattison-Ford, Jessica Matson, and Shawn Ford have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their son, and brother's society, companionship, comfort, advice and counsel.

ATTACK 6: AUGUST 24, 2006 - BAGHDAD, IRAQ

G. The Thorne Family

154. William Thorne was a citizen of the United States when he was killed in Iraq.

155. On August 24, 2006, William Thorne, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

156. William Thorne was killed in the attack.

157. The weapon used to kill William Thorne was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

158. Plaintiff Karen Thorne is a citizen of the United States and domiciled in the State of Iowa. She is the mother of William Thorne.

159. Plaintiff Doyle Thorne is a citizen of the United States and domiciled in the State of

160. Plaintiff Joey Robinson is a citizen of the United States and domiciled in the State of Nebraska. She is the sister of William Thorne.

161. Plaintiff Karen Thorne brings an action individually and on behalf of the Estate of William Thorne, as its legal representative.

162. As a result of the attack, and the death of William Thorne, Plaintiffs, Karen Thorne, Doyle Thorne and Joey Robinson have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their son, and brother's society, companionship, comfort, advice and counsel.

ATTACK 7: SEPTEMBER 7, 2006 - SADR CITY, IRAQ

H. The Botts Family

163. Plaintiff John Botts is a citizen of the United States and domiciled in the State of Minnesota.

164. On September 7, 2006, Plaintiff John Botts, was serving in the U.S. military in Iraq.

165. Plaintiff John Botts was injured when an EFP exploded near his vehicle.

166. The weapon used to injure Plaintiff John Botts was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

167. As a result of the attack, Plaintiff John Botts lost his left leg.

168. As a result of the attack, and the injuries he suffered, Plaintiff John Botts has experienced severe physical and mental anguish and extreme emotional pain and suffering.

169. Plaintiff Jennifer Botts is a citizen of the United States and domiciled in the State of Texas. She is the wife of John Botts.

170. Plaintiff Dara Botts is a citizen of the United States and domiciled in the State of Texas. She is the mother of John Botts.

171. Plaintiff John Stephen "Steve" Botts is a citizen of the United States and domiciled in

172. Plaintiff Elizabeth Cunningham is a citizen of the United States and domiciled in the State of Texas. She is sister of John Botts.

173. As a result of the attack, and the injuries suffered by John Botts, Plaintiffs Jennifer Botts, Dara Botts, John Stephen “Steve” Botts, and Elizabeth Cunningham have experienced severe mental anguish and extreme emotional pain and suffering.

ATTACK 8: OCTOBER 11, 2006 - BAGHDAD, IRAQ

I. The Sowinski Family

174. Nicholas Sowinski was a citizen of the United States when he was killed in Iraq.

175. On October 11, 2006, Nicholas Sowinski, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

176. Nicholas Sowinski was killed in the attack.

177. The weapon used to kill Nicholas Sowinski was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

178. Plaintiff Diane Traynor Sowinski is a citizen of the United States and domiciled in the State of Arizona. She is the mother of Nicholas Sowinski.

179. Plaintiff Jared Sowinski is a citizen of the United States and domiciled in the State of Arizona. He is the brother of Nicholas Sowinski.

180. Plaintiff Austin Sowinski is a citizen of the United States and domiciled in the State of Arizona. He is the brother of Nicholas Sowinski.

181. Plaintiff Diane Traynor Sowinski brings an action individually and on behalf of the Estate of Nicholas Sowinski, as its legal representative.

182. As a result of the attack, and the death of Nicholas Sowinski, Plaintiffs, Diane Traynor Sowinski, Jared Sowinski, and Austin Sowinski have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their son, and brother’s society, companionship,

ATTACK 9: NOVEMBER 2, 2006 BAGHDAD, IRAQ

J. The Gage Family

183. Joseph Gage was a citizen of the United States when he was killed in Iraq.

184. On November 2, 2006, Joseph Gage, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

185. Joseph Gage was killed in the attack.

186. The weapon used to kill Joseph Gage was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

187. Plaintiff Samantha Gage is a citizen of the United States and domiciled in the State of Michigan. She is the widow of Joseph Gage.

188. Plaintiff, M.G, a minor represented by his legal guardian, Samantha Gage, is a citizen of the United States and domiciled in the State of Michigan. He is the son of Samantha Gage.

189. Plaintiff Randy Gage is a citizen of the United States and domiciled in the State of California. He is the father of Joseph Gage.

190. Plaintiff Tamara Gage is a citizen of the United States and domiciled in the State of California. She is the step-mother of Joseph Gage.

191. Plaintiff Julia Rosa is a citizen of the United States and domiciled in the State of California. She is the sister of Joseph Gage.

192. Plaintiff Samantha Gage brings an action individually and on behalf of the Estate of Joseph Gage, as its legal representative.

193. As a result of the attack, and the death of Joseph Gage, Plaintiffs Samantha Gage, M.G., a minor, Randy Gage, Tamara Gage, and Julia Rosa have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband, father, son and brother's society, companionship, comfort, advice and counsel.

K. The Cope Family

194. Plaintiff Joshua Cope is a citizen of the United States and domiciled in the State of Minnesota.

195. On November 13, 2006, Plaintiff Joshua Cope, was serving in the U.S. military in Iraq.

196. Plaintiff Joshua Cope was injured when an EFP exploded near his vehicle.

197. The weapon used to injure Plaintiff Joshua Cope was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

198. As a result of the attack, Plaintiff Joshua Cope lost both of his legs and injured his right hand.

199. As a result of the attack, and the injuries he suffered, Plaintiff Joshua Cope has experienced severe physical and mental anguish and extreme emotional pain and suffering.

200. Plaintiff Erica Cope is a citizen of the United States and domiciled in the State of Florida. She is the former wife of Joshua Cope.

201. Plaintiff Linda Cope is a citizen of the United States and domiciled in the State of Florida. She is the mother of Joshua Cope.

202. Plaintiff Philip Cope is a citizen of the United States and domiciled in the State of Florida. He is father of Joshua Cope.

203. Plaintiff Jacob Cope is a citizen of the United States and domiciled in the State of Florida. He is the brother of Joshua Cope.

204. Plaintiff Jonathan Cope is a citizen of the United States and domiciled in the State of Florida. He is the brother of Joshua Cope.

205. Plaintiff L.C., a minor represented by her father, Joshua Cope, is a citizen of the United States and domiciled in the State of Florida. She is the daughter of Joshua Cope.

Cope, Philip Cope, Jacob Cope, Jonathan Cope and L.C., a minor, have experienced severe mental anguish and extreme emotional pain and suffering.

ATTACK 11: DECEMBER 6, 2006 – HAWIJAH, IRAQ

L. The Huffman Family

207. Jason Huffman was a citizen of the United States when he was killed in Iraq.

208. On December 6, 2006, Jason Huffman, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

209. Jason Huffman was killed in the attack.

210. The weapon used to kill Jason Huffman was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

211. Plaintiff Karen Huffman is a citizen of the United States and domiciled in the State of North Carolina. She is the mother of Jason Huffman.

212. Plaintiff Gary Huffman is a citizen of the United States and domiciled in the State of North Carolina. He is the father of Jason Huffman.

213. Plaintiff Torie Huffman Murphy is a citizen of the United States and domiciled in the State of North Carolina. She is the sister of Jason Huffman.

214. Plaintiff Karen Huffman brings an action individually and on behalf of the Estate of Jason Huffman, as its legal representative.

215. As a result of the attack, and the death of Jason Huffman, Plaintiffs Karen Huffman, Gary Huffman, and Torie Huffman Murphy have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

M. The Mokri Family

216. Yari Mokri was a citizen of the United States when he was killed in Iraq.

217. On December 6, 2006, Yari Mokri, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

218. Yari Mokri was killed in the attack.

219. The weapon used to kill Yari Mokri was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

220. Plaintiff Andrea Schaible is a citizen of the United States and domiciled in the State of Texas. She is the widow of Yari Mokri.

221. Plaintiff Andrea Schaible brings an action individually and on behalf of the Estate of Yari Mokri, as its legal representative.

222. As a result of the attack, and the death of Yari Mokri, Plaintiff, Andrea Schaible experienced severe mental anguish, extreme emotional pain and suffering, and loss of her husband's society, companionship, comfort, advice and counsel.

ATTACK 12: FEBRUARY 7, 2007 - IRAQ

N. The Vendela Family

223. Plaintiff Travis Vendela is a citizen of the United States and domiciled in the State of Arizona.

224. On February 7, 2007, Plaintiff Travis Vendela, was serving in the U.S. military in Iraq.

225. Plaintiff Travis Vendela was injured when an EFP exploded near his vehicle.

226. The weapon used to injure Plaintiff Travis Vendela was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

227. As a result of the attack, Plaintiff Travis Vendela lost both of his legs above the knee along with a fractured pelvis, fractured left elbow, fractured spine, fractured jaw and Traumatic Brain Injury.

228. As a result of the attack, and the injuries he suffered, Plaintiff Travis Vendela

229. Plaintiff Marianne Vendela is a citizen of the United States and domiciled in the State of Arizona. She is the mother of Travis Vendela.

230. As a result of the attack, and the injuries suffered by Travis Vendela, Plaintiff Marianne Vendela experienced severe mental anguish and extreme emotional pain and suffering.

ATTACK 13: FEBRUARY 27, 2007 – BAGHDAD, IRAQ

O. The Cadavero Family

231. Jonathan Cadavero was a citizen of the United States when he was killed in Iraq.

232. On February 27, 2007, Jonathan Cadavero, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

233. Jonathan Cadavero was killed in the attack.

234. The weapon used to kill Jonathan Cadavero was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

235. Plaintiff Nadia Cadavero is a citizen of the United States and domiciled in the State of New York. She is the mother of Jonathan Cadavero.

236. Plaintiff Kristia Markarian is a citizen of the United States and domiciled in the State of New Jersey. She is the sister of Jonathan Cadavero.

237. Plaintiff Nadia Cadavero brings an action individually and on behalf of the Estate of Jonathan Cadavero, as its legal representative.

238. As a result of the attack, and the death of Jonathan Cadavero, Plaintiffs, Nadia Cadavero and Kristia Makarian have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their son, and brother's society, companionship, comfort, advice and counsel.

ATTACK 14: MARCH 5, 2007 – BAQUBAH, IRAQ

P. The Mayo Family

239. Barry W. Mayo was a citizen of the United States when he was killed in Iraq.

240. On March 5, 2007, Barry W. Mayo, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

241. Barry W. Mayo was killed in the attack.

242. The weapon used to kill Barry W. Mayo was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

243. Plaintiff John Mayo is a citizen of the United States and domiciled in the State of Mississippi. He is the father of Barry W. Mayo.

244. Plaintiff Rebeca Mayo is a citizen of the United States and domiciled in the State of Mississippi. She is the step-mother of Barry W. Mayo.

245. Plaintiff Andy Mayo is a citizen of the United States and domiciled in the State of Mississippi. He is the brother of Barry W. Mayo.

246. Plaintiff John Mayo brings an action individually and on behalf of the Estate of Barry W. Mayo, as its legal representative.

247. As a result of the attack, and the death of Barry W. Mayo, Plaintiffs, John Mayo, Rebeca Mayo and Andy Mayo have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their son, and brother's society, companionship, comfort, advice and counsel.

Q. The Russell Family

248. Ryan Russell was a citizen of the United States when he was killed in Iraq.

249. On March 5, 2007, Ryan Russell, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

250. Ryan Russell was killed in the attack.

251. The weapon used to kill Ryan Russell was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

252. Plaintiff Kathy Moore is a citizen of the United States and domiciled in the State of North Carolina. She is the mother of Ryan Russell.

253. Plaintiff Thomas Edison-Moore, Jr. is a citizen of the United States and domiciled in the State of North Carolina. He is the step-father of Ryan Russell.

254. Plaintiff Kathy Moore brings an action individually and on behalf of the Estate of Ryan Russell, as its legal representative.

255. As a result of the attack, and the death of Ryan Russell, Plaintiffs, Kathy Moore and Thomas Edison-Moore, Jr. have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their son's society, companionship, comfort, advice and counsel.

ATTACK 15: MAY 8, 2007 – SALMAN PAK, IRAQ

R. The Martinez Family

256. Plaintiff Saul Martinez is a citizen of the United States and domiciled in the State of Montana.

257. On May 8, 2007, Plaintiff Saul Martinez, was serving in the U.S. military in Iraq.

258. Plaintiff Saul Martinez was on patrol when an EFP struck his vehicle.

259. The weapon used to injure Plaintiff Saul Martinez was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

260. As a result of the attack, Plaintiff Saul Martinez lost both of his legs.

261. As a result of the attack, and the injuries he suffered, Plaintiff Saul Martinez has experienced severe physical and mental anguish and extreme emotional pain and suffering.

262. Plaintiff Sarah Martinez is a citizen of the United States and domiciled in the State of Montana. She is the wife of Saul Martinez.

263. As a result of the attack, and the injuries suffered by Saul Martinez, Plaintiff Sarah Martinez has experienced severe mental anguish, and extreme emotional pain and suffering.

S. The Stephens Family

264. Blake Stephens was a citizen of the United States when he was killed in Iraq.

265. On May 8, 2007, Blake Stephens, was serving in the U.S. military in Iraq when an

266. Blake Stephens was killed in the attack.

267. The weapon used to kill Blake Stephens was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

268. Plaintiff Erin Ductor is a citizen of the United States and domiciled in the State of California. She is the widow of Blake Stephens.

269. Plaintiff Kathleen Stephens is a citizen of the United States and domiciled in the State of California. She is the mother of Blake Stephens.

270. Plaintiff Trent Stephens is a citizen of the United States and domiciled in the State of California. He is the father of Blake Stephens.

271. Plaintiff Summer Stephens is a citizen of the United States and domiciled in the State of California. She is the sister of Blake Stephens.

272. Plaintiff Rhett Stephens is a citizen of the United States and domiciled in the State of California. He is the brother of Blake Stephens.

273. Plaintiff Brittani Hobson is a citizen of the United States and domiciled in the State of Idaho. She is the sister of Blake Stephens.

274. Plaintiff Derek Stephens is a citizen of the United States and domiciled in the State of Idaho. He is the brother of Blake Stephens.

275. Plaintiff Erin Ductor brings an action individually and on behalf of the Estate of Blake Stephens, as its legal representative.

276. As a result of the attack, and the death of Blake Stephens, Plaintiffs, Erin Ductor, Kathleen Stephens, Trent Stephens, Summer Stephens, Rhett, Stephens, Brittani Hobson, and Derek Stephens have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their husband, son, and brother's society, companionship, comfort, advice and counsel.

ATTACK 16: MAY 14, 2007 – IRAQ

T. The Altman Family

277. Plaintiff Jake Hamilton Altman is a citizen of the United States and domiciled in the State of North Carolina.

278. On May 14, 2007, Plaintiff Jake Hamilton Altman, was serving in the U.S. military in Iraq.

279. Plaintiff Jake Hamilton Altman was operating the vehicle convoy when an EFP exploded near his vehicle.

280. The weapon used to injure Plaintiff Jake Hamilton Altman was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

281. As a result of the attack, Plaintiff Jake Hamilton Altman lost his right dominant hand and has severe injuries to both legs.

282. As a result of the attack, and the injuries he suffered, Plaintiff Jake Hamilton Altman has experienced severe physical and mental anguish and extreme emotional pain and suffering.

283. Plaintiff Nadja Altman is a citizen of the United States and domiciled in the State of North Carolina. She is the wife of Jake Hamilton Altman.

284. Plaintiff J.A., a minor represented by his legal guardian Jake Hamilton Altman, is a citizen of the United States and domiciled in the State of North Carolina. He is the son of Jake Hamilton Altman.

285. Plaintiff L.A., a minor represented by her legal guardian Jake Hamilton Altman, is a citizen of the United States and domiciled in the State of North Carolina. She is the daughter of Jake Hamilton Altman.

286. Plaintiff Gloria Prosser is a citizen of the United States and domiciled in the State of North Carolina. She is the mother of Jake Hamilton Altman.

287. Plaintiff Charles Altman is a citizen of the United States and domiciled in the State of North Carolina. He is the brother of Jake Hamilton Altman.

of Colorado. He is the brother of Jake Hamilton Altman.

289. As a result of the attack, and the injuries suffered by Jake Hamilton Altman, Plaintiff Jake Hamilton Altman, Nadja Altman, J.A., a minor, L.A., a minor, Gloria Prosser, Charles Altman and Michael Altman have experienced severe mental anguish and extreme emotional pain and suffering.

ATTACK 17: MAY 19, 2007 - AL DIWANIYA, IRAQ

U. The Dahlman Family

290. Plaintiff Louis Dahlman is a citizen of the United States and domiciled in the State of Texas.

291. On May 19, 2007, Plaintiff Louis Dahlman, was serving in the U.S. military in Iraq.

292. Plaintiff Louis Dahlman was injured when an EFP exploded near his vehicle.

293. The weapon used to injure Plaintiff Louis Dahlman was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

294. As a result of the attack, Plaintiff Louis Dahlman has traumatic brain injury, PTSD, and a prosthetic jaw.

295. As a result of the attack, and the injuries he suffered, Plaintiff Louis Dahlman has experienced severe physical and mental anguish and extreme emotional pain and suffering.

296. Plaintiff Kay Stockdale is a citizen of the United States and domiciled in the State of Iowa. She is the mother of Louis Dahlman.

297. Plaintiff Lucas Dahlman is a citizen of the United States and domiciled in the State of Iowa. He is the brother of Louis Dahlman.

298. Plaintiff Amber Dahlman is a citizen of the United States and domiciled in the State of Iowa. She is the sister of Louis Dahlman.

299. As a result of the attack, and the injuries suffered by Louis Dahlman, Plaintiff Louis

ATTACK 18: JUNE 19, 2007 – MUHAMMED AL ALI, IRAQ

V. The Modgling Family

300. Joshua Modgling was a citizen of the United States when he was killed in Iraq.

301. On June 19, 2007, Joshua Modgling, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

302. Joshua Modgling was killed in the attack.

303. The weapon used to kill Joshua Modgling was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

304. Plaintiff Julie Montano is a citizen of the United States and domiciled in the State of Nevada. She is the mother of Joshua Modgling.

305. Plaintiff Keith Modgling is a citizen of the United States and domiciled in the State of Nevada. He is the father of Joshua Modgling.

306. Plaintiff Christopher Modgling is a citizen of the United States and domiciled in the State of Nevada. He is the brother of Joshua Modgling.

307. Plaintiff Kellilynn Stewart is a citizen of the United States and domiciled in the State of Nevada. She is the sister of Joshua Modgling.

308. Plaintiff Michelle Modgling is a citizen of the United States and domiciled in the State of Nevada. She is the sister of Joshua Modgling.

309. Plaintiff Kenneth Schaffer is a citizen of the United States and domiciled in the State of Nevada. He is the brother of Joshua Modgling.

310. Plaintiff Julie Montano brings an action individually and on behalf of the Estate of Joshua Modgling, as its legal representative.

311. As a result of the attack, and the death of Joshua Modgling, Plaintiffs, Julie

Case 1:16-cv-02193-EGS Document 5 Filed 01/24/17 Page 39 of 64
Montano, Keith Modgling, Christopher Modgling, Kellilynn Stewart, and Kenneth Schaffer have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their husband, son, and brother's society, companionship, comfort, advice and counsel.

W. The Zapfe Family

312. William A. Zapfe was a citizen of the United States when he was killed in Iraq.

313. On June 19, 2007, William A. Zapfe, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

314. William A. Zapfe was killed in the attack.

315. The weapon used to kill William A. Zapfe was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

316. Plaintiff Jeannie Zapfe is a citizen of the United States and domiciled in the State of Idaho. She is the mother of William A. Zapfe.

317. Plaintiff Joseph Zapfe is a citizen of the United States and domiciled in the State of Idaho. He is the brother of William A. Zapfe.

318. Plaintiff Edward Zapfe is a citizen of the United States and domiciled in the State of Idaho. He is the brother of William A. Zapfe.

319. Plaintiff Jeannie Zapfe brings an action individually and on behalf of the Estate of William A. Zapfe, as its legal representative.

320. As a result of the attack, and the death of William A. Zapfe, Plaintiffs, Jeannie Zapfe, Joseph Zapfe, and Edward Zapfe have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their son, and brother's society, companionship, comfort, advice and counsel.

ATTACK 19: JUNE 29, 2007 – BAGHDAD, IRAQ

X. The Adair Family

321. James Adair was a citizen of the United States when he was killed in Iraq.

322. On June 29, 2007, James Adair, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

323. James Adair was killed in the attack.

324. The weapon used to kill James Adair was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

325. Plaintiff Chelsea Adair is a citizen of the United States and domiciled in the State of Texas. She is the widow of James Adair.

326. Plaintiff, A.A., a minor represented by her legal guardian, Chelsea Adair, is a citizen of the United States and domiciled in the State of Texas. She is the daughter of James Adair.

327. Plaintiff Chelsea Adair brings an action individually and on behalf of the Estate of James Adair, as its legal representative.

328. As a result of the attack, and the death of James Adair, Plaintiffs Chelsea Adair and A.A, a minor, have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband and father's society, companionship, comfort, advice and counsel.

Y. The Takai Family

329. Plaintiff John Takai is a citizen of the United States and domiciled in the State of Texas.

330. On June 29, 2007, Plaintiff John Takai, was serving in the U.S. military in Iraq.

331. Plaintiff John Takai was injured when an EFP exploded near his vehicle.

332. The weapon used to injure Plaintiff John Takai was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

333. As a result of the attack, Plaintiff John Takai has a traumatic brain injury, PTSD, and a lower left salvaged arm.

334. As a result of the attack, and the injuries he suffered, Plaintiff John Takai has experienced severe physical and mental anguish and extreme emotional pain and suffering.

335. Plaintiff Mae Takai is a citizen of the United States and domiciled in the State of Texas. She is the wife of John Takai.

336. Plaintiff J.T., a minor represented by her legal guardian John Takai, is a citizen of the United States and domiciled in the State of Texas. She is the daughter of John Takai.

337. Plaintiff N.T., a minor represented by her legal guardian John Takai, is a citizen of the United States and domiciled in the State of Texas. She is the daughter of John Takai.

338. Plaintiff K.T., a minor represented by her legal guardian John Takai, is a citizen of the United States and domiciled in the State of Texas. She is the daughter of John Takai.

339. Plaintiff I.T., a minor represented by her legal guardian John Takai, is a citizen of the United States and domiciled in the State of Texas. She is the daughter of John Takai.

340. Plaintiff Patricia Cruze is a citizen of the United States and domiciled in the Territory of Guam. She is the mother of John Takai.

341. Plaintiff Juan Takai is a citizen of the United States and domiciled in the State of Texas. He is the father of John Takai.

342. Plaintiff Jolean Takai is a citizen of the United States and domiciled in the Territory of Guam. She is the sister of John Takai.

343. Plaintiff Jermaine Takai is a citizen of the United States and domiciled in the State of Texas. He is the brother of John Takai.

344. As a result of the attack, and the injuries suffered by John Takai, Plaintiff John Takai, Mae Takai, J.T., a minor, N.T., a minor, K.T., a minor, I.T., a minor, Patricia Cruze, Juan Takai, Jolean Takai, and Jermaine Takai have experienced severe mental anguish and extreme emotional pain and suffering.

ATTACK 20: JULY 5, 2007 – BAGHDAD, IRAQ

Z. The Ahearn Family

345. James Ahearn was a citizen of the United States when he was killed in Iraq.

346. On July 5, 2007, James Ahearn, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

347. James Ahearn was killed in the attack.

348. The weapon used to kill James Ahearn was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

349. Plaintiff Constance Ahearn is a citizen of the United States and domiciled in the State of California. She is the mother of James Ahearn .

350. Plaintiff James Ahearn Sr. is a citizen of the United States and domiciled in the State of Arizona. He is the father of James Ahearn .

351. Plaintiff Kevin Ahearn is a citizen of the United States and domiciled in the State of Arizona. He is the brother of James Ahearn .

352. Plaintiff Constance Ahearn brings an action individually and on behalf of the Estate of James Ahearn , as its legal representative.

353. As a result of the attack, and death of James Ahearn, Plaintiffs Constance Ahearn, James Ahearn Sr. and Kevin Ahearn have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband, father, son and brother's society, companionship, comfort, advice and counsel.

ATTACK 21: JULY 6, 2007 – BAGHDAD, IRAQ

AA. The Lill Family

354. Eric Lill was a citizen of the United States when he was killed in Iraq.

355. On July 6, 2007, Eric Lill was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

356. Eric Lill was killed in the attack.

357. The weapon used to kill Eric Lill was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

358. Plaintiff Skye Otero is a citizen of the United States and domiciled in the State of Tennessee. She is the widow of Eric Lill.

359. Plaintiff C.L., a minor represented by his legal guardian Skye Otero, is a citizen of the United States and domiciled in the State of Tennessee. He is the son of Eric Lill.

360. Plaintiff M.L., a minor represented by his legal guardian Skye Otero, is a citizen of the United States and domiciled in the State of Tennessee. She is the daughter of Eric Lill.

361. Plaintiff Anthony Lill is a citizen of the United States and domiciled in the State of Tennessee. He is the father of Eric Lill.

362. Plaintiff Charmaine Lill is a citizen of the United States and domiciled in the State of Tennessee. She is the mother of Eric Lill.

363. Plaintiff Kortne Jones is a citizen of the United States and domiciled in the State of Tennessee. She is the sister of Eric Lill.

364. Plaintiff Anthony Lill brings an action individually and on behalf of the Estate of Gary Henry, as its legal representative.

365. As a result of the attack, and the death of Eric Lill, Plaintiffs Skye Otero, C.L., a minor, M.L., a minor, Anthony Lill and Charmaine Lill has experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband, father, brother and son's society, companionship, comfort, advice and counsel.

ATTACK 22: JULY 7, 2007 – BAGHDAD, IRAQ

BB. The Kline Family

366. Keith Kline was a citizen of the United States when he was killed in Iraq.

367. On July 7, 2007, Keith Kline, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

368. Keith Kline was killed in the attack.

369. The weapon used to kill Keith Kline was an Iranian-manufactured EFP provided to

370. Plaintiff Betty Jean Kline is a citizen of the United States and domiciled in the State of Ohio. She is the mother of Keith Kline.

371. Plaintiff John Kline is a citizen of the United States and domiciled in the State of Ohio. He is the brother of Keith Kline.

372. Plaintiff Betty Jean Kline brings an action individually and on behalf of the Estate of Keith Kline, as its legal representative.

373. As a result of the attack, and the death of Keith Kline, Plaintiffs Betty Jean Kline and John Kline, have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

ATTACK 23: JULY 14, 2007 – BAGHDAD, IRAQ

CC. The Kube Family

374. Christopher Kube was a citizen of the United States when he was killed in Iraq.

375. On July 14, 2007, Christopher Kube was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

376. Christopher Kube was killed in the attack.

377. The weapon used to kill Christopher Kube was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

378. Plaintiff Debbie Otte is a citizen of the United States and domiciled in the State of Michigan. She is the mother of Christopher Kube.

379. Plaintiff David Kube is a citizen of the United States and domiciled in the State of Michigan. He is the father of David Kube.

380. Plaintiff Jonathan Kube is a citizen of the United States and domiciled in the State of Michigan. He is the brother of Christopher Kube.

381. Plaintiff Jessica Kube is a citizen of the United States and domiciled in the State of

382. Plaintiff Jason Kube is a citizen of the United States and domiciled in the State of Michigan. He is the brother of Christopher Kube.

383. Jennifer Kube is a citizen of the United States and domiciled in the State of Michigan. She is the sister of Christopher Kube.

384. Plaintiff David Kube brings an action individually and on behalf of the Estate of Christopher Kube, as its legal representative.

385. As a result of the attack, and the death of Christopher Kube, Plaintiffs Debbie Otte, David Kube, Jonathan Kube, Jessica Kube, Jason Kube, and Jennifer Kube has experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

ATTACK 24: AUGUST 4, 2007 – HAWR RAJAB, IRAQ

DD. The Wakeman Family

386. Dustin Wakeman was a citizen of the United States when he was killed in Iraq.

387. On August 4, 2007, Dustin Wakeman was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

388. Dustin Wakeman was killed in the attack.

389. The weapon used to kill Dustin Wakeman was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

390. Plaintiff Margaret Wakeman is a citizen of the United States and domiciled in the State of Texas. She is the mother of Dustin Wakeman.

391. Plaintiff David Wakeman is a citizen of the United States and domiciled in the State of Texas. He is the father of Dustin Wakeman.

392. Plaintiff William Wakeman is a citizen of the United States and domiciled in the State of Texas. He is the brother of Dustin Wakeman.

393. Plaintiff Margaret Wakeman brings an action individually and on behalf of the Estate of Dustin Wakeman, as its legal representative.

394. As a result of the attack, and the death of Dustin Wakeman, Plaintiffs Margaret Wakeman, David Wakeman, and William Wakeman have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

ATTACK 25: AUGUST 6, 2007 – BAGHDAD, IRAQ

EE. The Neiberger Family

395. Christopher Neiberger was a citizen of the United States when he was killed in Iraq.

396. On August 6, 2007, Christopher Neiberger, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

397. Christopher Neiberger was killed in the attack.

398. The weapon used to kill Christopher Neiberger was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

399. Plaintiff Mary Neiberger is a citizen of the United States and domiciled in the State of Florida. She is the mother of Christopher Neiberger.

400. Plaintiff Richard Neiberger is a citizen of the United States and domiciled in the State of Florida. He is the father of Christopher Neiberger.

401. Plaintiff Ami Neiberger is a citizen of the United States and domiciled in the State of Virginia. She is the sister of Christopher Neiberger.

402. Plaintiff Robert Neiberger is a citizen of the United States and domiciled in the State of Maryland. He is the brother of Christopher Neiberger.

403. Plaintiff Eric Neiberger is a citizen of the United States and domiciled in the State of Florida. He is the brother of Christopher Neiberger.

404. Plaintiff Mary Neiberger brings an action individually and on behalf of the Estate of

405. As a result of the attack, and the death of Christopher Neiberger, Plaintiffs Mary Neiberger, Richard Neiberger, Ami Neiberger, Robert Neiberger, Eric Neiberger have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

ATTACK 26: SEPTEMBER 22, 2007 – BAGHDAD, IRAQ

FF. The Reeves Family

406. Joshua Reeves was a citizen of the United States when he was killed in Iraq.

407. On September 22, 2007, Joshua Reeves, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

408. Joshua Reeves was killed in the attack.

409. The weapon used to kill Joshua Reeves was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

410. Plaintiff Leslie Hardcastle is a citizen of the United States and domiciled in the State of Georgia. She is the widow of Joshua Reeves.

411. Plaintiff J.R., a minor represented by his legal guardian, Leslie Hardcastle, is a citizen of the United States and domiciled in the State of Georgia. He is the son of Joshua Reeves.

412. Plaintiff Jean Reeves is a citizen of the United States and domiciled in the State of Georgia. She is the mother of Joshua Reeves.

413. Plaintiff James Reeves is a citizen of the United States and domiciled in the State of Georgia. He is the father of Joshua Reeves.

414. Plaintiff Michael Reeves is a citizen of the United States and domiciled in the State of Georgia. He is the brother of Joshua Reeves.

415. Plaintiff Jared Reeves is a citizen of the United States and domiciled in the State of Georgia. He is the brother of Joshua Reeves.

416. Plaintiff Leslie Hardcastle brings an action individually and on behalf of the Estate of Joshua Reeves, as its legal representative.

417. As a result of the attack, and the death of Joshua Reeves, Plaintiffs Leslie Hardcastle, J.R., a minor, Jean Reeves, James Reeves, Michael Reeves, and Jared Reeves have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband, father, son and brother's society, companionship, comfort, advice and counsel.

ATTACK 27: NOVEMBER 2, 2007 – IRAQ

GG. The Wells Family

418. Plaintiff Joshua Wells is a citizen of the United States and domiciled in the State of Minnesota.

419. On November 2, 2007, Plaintiff Joshua Wells, was serving in the U.S. military in Iraq.

420. Plaintiff Joshua Wells was injured when an EFP exploded near his vehicle.

421. The weapon used to injure Plaintiff Joshua Wells was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

422. As a result of the attack, Plaintiff Joshua Wells lost both of his legs.

423. As a result of the attack, and the injuries he suffered, Plaintiff Joshua Wells has experienced severe physical and mental anguish and extreme emotional pain and suffering.

424. Plaintiff Lydia Lantrip is a citizen of the United States and domiciled in the State of Mississippi. She is the mother of Joshua Wells.

425. Plaintiff Billie Wells, Jr. is a citizen of the United States and domiciled in the State of Mississippi. He is the father of Joshua Wells.

426. Plaintiff Blake Lantrip is a citizen of the United States and domiciled in the State of Mississippi. He is the brother of Joshua Wells.

427. Plaintiff J.W., a minor represented by his legal guardian, Billie Wells, Jr., is a citizen of the United States and domiciled in the State of Mississippi. He is the brother of Joshua Wells.

Lantrip, Billie Wells, Jr., Blake Lantrip, and J.W., a minor, have experienced severe mental anguish and extreme emotional pain and suffering.

ATTACK 28: MARCH 24, 2008 – BAGHDAD, IRAQ

HH. The Rubio-Hernandez Family

162. Jose Rubio-Hernandez was a citizen of the United States when he was killed in Iraq.

163. On March 24, 2008, Jose Rubio-Hernandez was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

164. Jose Rubio-Hernandez was killed in the attack.

165. The weapon used to kill Jose Rubio-Hernandez was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

166. Plaintiff Jennifer Rubio is a citizen of the United States and domiciled in the State of Texas. She is the widow of Jose Rubio-Hernandez.

167. Plaintiff N.R., a minor, represented by his legal guardian Jennifer Rubio, is a citizen of the United States and domiciled in the State of Texas. He is the son of Jose Rubio-Hernandez.

168. Plaintiff Jennifer Rubio brings an action individually and on behalf of the Estate of Jose Rubio-Hernandez, as its legal representative.

169. As a result of the attack, and the death of Jose Rubio-Hernandez, Plaintiffs Jennifer Rubio and N.R., a minor, have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband and father's society, companionship, comfort, advice and counsel.

ATTACK 29: MARCH 29, 2008 – BAGHDAD, IRAQ

II. The Bennett Family

429. Durrell Bennett was a citizen of the United States when he was killed in Iraq.

430. On March 29, 2008, Durrell Bennett was serving in the U.S. military in Iraq when an

431. Durrell Bennett was killed in the attack.

432. The weapon used to kill Durrell Bennett was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

433. Plaintiff Doris Bennett is a citizen of the United States and domiciled in the State of Washington. She is the mother of Durrell Bennett.

434. Plaintiff Dempsey Bennett is a citizen of the United States and domiciled in the State of Washington. He is the father of Durrell Bennett.

435. Plaintiff Darnell Bennett is a citizen of the United States and domiciled in the State of Washington. He is the brother of Durrell Bennett.

436. Plaintiff Doris Bennett brings an action individually and on behalf of the Estate of Durrell Bennett, as its legal representative.

437. As a result of the attack, and the death of Durrell Bennett, Plaintiffs Doris Bennett, Dempsey Bennett and Durrell Bennett have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

ATTACK 30: JUNE 1, 2008 – BAGHDAD, IRAQ

JJ. The Mixon Family

438. Justin Mixon was a citizen of the United States when he was killed in Iraq.

439. On June 1, 2008, Justin Mixon, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

440. Justin Mixon was killed in the attack.

441. The weapon used to kill Justin Mixon was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

442. Plaintiff Melinda Mixon is a citizen of the United States and domiciled in the State of

443. Plaintiff T.R.M., a minor represented by his legal guardian Tia Mixon, is a citizen of the United States and domiciled in the State of Texas. He is the son of Justin Mixon.

444. Plaintiff Melinda Mixon is a citizen of the United States and domiciled in the State of Mississippi. She is the mother of Justin Mixon.

445. Plaintiff Walter Mixon is a citizen of the United States and domiciled in the State of Mississippi. He is the father of Justin Mixon.

446. Plaintiff Kenneth Mixon is a citizen of the United States and domiciled in the State of Mississippi. He is the brother of Justin Mixon.

447. Plaintiff Kimberly Spillyards is a citizen of the United States and domiciled in the State of Mississippi. She is the sister of Justin Mixon.

448. Plaintiff Tia Mixon brings an action individually and on behalf of the Estate of Justin Mixon, as its legal representative.

449. As a result of the attack, and the death of Justin Mixon, Plaintiffs Tia Mixon, T.R.M., a minor, Melinda Mixon, Walter Mixon, Kenneth Mixon, and Kimberly Spillyards have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband, father, son and brother's society, companionship, comfort, advice and counsel.

ATTACK 31: JUNE 25, 2008 – BAGHDAD, IRAQ

KK. The Plocica Family

170. Joshua Plocica was a citizen of the United States when he was killed in Iraq.

171. On June 25, 2008, Joshua Plocica was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

172. Joshua Plocica was killed in the attack.

173. The weapon used to kill Joshua Plocica was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

174. Plaintiff Lisa Thompson is a citizen of the United States and domiciled in the State of Tennessee. She is the mother of Joshua Plocica.

175. Plaintiff Lowell “Keith” Thompson is a citizen of the United States and domiciled in the State of Tennessee. He is the step-father of Joshua Plocica.

176. Plaintiff Brenna Corbin is a citizen of the United States and domiciled in the State of Tennessee. She is the sister of Joshua Plocica.

177. Plaintiff Lisa Thompson brings an action individually and on behalf of the Estate of Joshua Plocica, as its legal representative.

178. As a result of the attack, and the death of Joshua Plocica, Plaintiffs Lisa Thompson, Lowell “Keith” Thompson and Brenna Corbin have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother’s society, companionship, comfort, advice and counsel.

ATTACK 32: AUGUST 4, 2008 – BAGHDAD, IRAQ

LL. The Blickenstaff Family

179. Plaintiff John Blickenstaff is a citizen of the United States and domiciled in the State of Indiana.

180. On May 8, 2007, Plaintiff John Blickenstaff, was serving in the U.S. military in Iraq.

181. Plaintiff John Blickenstaff was on patrol when an EFP struck his vehicle.

182. The weapon used to injure Plaintiff John Blickenstaff was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

183. As a result of the attack, Plaintiff John Blickenstaff suffers from PTSD and has severe injury to his right foot.

184. As a result of the attack, and the injuries he suffered, Plaintiff John Blickenstaff has experienced severe physical and mental anguish and extreme emotional pain and suffering.

185. Plaintiff Misty Blickenstaff is a citizen of the United States and domiciled in the State

186. Plaintiff Pam Jones is a citizen of the United States and domiciled in the State of Indiana. She is the mother of John Blickenstaff.

187. Plaintiff Jared Blickenstaff is a citizen of the United States and domiciled in the State of Indiana. He is the brother of John Blickenstaff.

188. Plaintiff Adrienne Blickenstaff is a citizen of the United States and domiciled in the State of Indiana. She is the sister of John Blickenstaff.

189. Plaintiff Trista Carter is a citizen of the United States and domiciled in the State of Indiana. She is the sister of John Blickenstaff.

190. Plaintiff A.B., a minor, represented by his legal guardian John Blickenstaff, is a citizen of the United States and domiciled in the State of Indiana. He is the son of John Blickenstaff.

191. Plaintiff M.B., a minor, represented by her legal guardian John Blickenstaff, is a citizen of the United States and domiciled in the State of Indiana. She is the daughter of John Blickenstaff.

192. Plaintiff C.B., a minor, represented by her legal guardian John Blickenstaff, is a citizen of the United States and domiciled in the State of Indiana. She is the daughter of John Blickenstaff.

193. As a result of the attack, and the injuries suffered by John Blickenstaff, Plaintiffs Misty Blickenstaff, Pam Jones, Jared Blickenstaff, Adrienne Blickenstaff, Trista Carter, A.B., a minor, M.B. a minor, and C.B., a minor have experienced severe mental anguish, and extreme emotional pain and suffering.

MM. The Henry Family

450. Gary Henry was a citizen of the United States when he was killed in Iraq.

451. On August 4, 2008, Gary Henry was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

452. Gary Henry was killed in the attack.

453. The weapon used to kill Gary Henry was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

454. Plaintiff Gary L. Henry is a citizen of the United States and domiciled in the State of Indiana. He is the father of Gary Henry.

455. Plaintiff Gary L. Henry brings an action individually and on behalf of the Estate of Gary Henry, as its legal representative.

456. As a result of the attack, and the death of Gary Henry, Plaintiff Gary L. Henry has experienced severe mental anguish, extreme emotional pain and suffering, and the loss of his son's society, companionship, comfort, advice and counsel.

ATTACK 33: FEBRUARY 15, 2009 – AS SALAM, IRAQ

NN. The Diamond Family

457. Sean Diamond was a citizen of the United States when he was killed in Iraq.

458. On February 15, 2009, Sean Diamond was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

459. Sean Diamond was killed in the attack.

460. The weapon used to kill Sean Diamond was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

461. Plaintiff Loramay "Lora" Diamond is a citizen of the United States and domiciled in the State of Washington. She is the widow of Sean Diamond.

462. Plaintiff Sally Diamond Wiley is a citizen of the United States and domiciled in the State of Nevada. She is the mother of Sean Diamond.

463. Plaintiff Michael Wiley is a citizen of the United States and domiciled in the State of Nevada. He is the step-father of Sean Diamond.

464. Plaintiff Jason Diamond is a citizen of the United States and domiciled in the State of California. He is the brother of Sean Diamond.

465. Plaintiff Michael Diamond is a citizen of the United States and domiciled in the State of California. He is the brother of Sean Diamond.

466. Plaintiff Taylor M. Diamond is a citizen of the United States and domiciled in the State of Washington. She is the daughter of Sean Diamond.

467. Plaintiff Madison J. Diamond is a citizen of the United States and domiciled in the State of Washington. She is the daughter of Sean Diamond.

468. Plaintiff A.D., a minor represented by her legal guardian Loramay “Lora” Diamond, is a citizen of the United States and domiciled in the State of Washington. She is the daughter of Sean Diamond.

469. Plaintiff S.D., a minor represented by his legal guardian Loramay “Lora” Diamond, is a citizen of the United States and domiciled in the State of Washington. He is the son of Sean Diamond.

470. Plaintiff Loramay “Lora” Diamond brings an action individually and on behalf of the Estate of Sean Diamond, as its legal representative.

471. As a result of the attack, and the death of Sean Diamond, Plaintiffs Loramay “Lora” Diamond, Sally Diamond Wiley, Michael Wiley, Jason Diamond, Michael Diamond, Taylor M. Diamond, Madison J. Diamond, A.D., a minor and S.D., a minor have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their husband, father, brother and son’s society, companionship, comfort, advice and counsel.

ATTACK 34: APRIL 12, 2009 – BAYJI, IRAQ

OO. The Anaya Family

472. Michael Anaya was a citizen of the United States when he was killed in Iraq.

473. On April 12, 2009, Michael Anaya, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

474. Michael Anaya was killed in the attack.

475. The weapon used to kill Michael Anaya was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

476. Plaintiff Cheryl Anaya is a citizen of the United States and domiciled in the State of Florida. She is the mother of Michael Anaya.

477. Plaintiff Trista Moffett is a citizen of the United States and domiciled in the State of Florida. She is the sister of Michael Anaya.

478. Plaintiff Carmelo Anaya Jr. is a citizen of the United States and domiciled in the State of Florida. He is the brother of Michael Anaya.

479. Plaintiff Cheryl Anaya brings an action individually and on behalf of the Estate of Michael Anaya, as its legal representative.

480. As a result of the attack, and the death of Michael Anaya, Plaintiffs Cheryl Anaya, Trista Moffett, and Carmelo Anaya Jr. have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

ATTACK 35: JULY 16, 2009 – BASRA, IRAQ

PP. The Wilcox Family

481. Carlos Wilcox was a citizen of the United States when he was killed in Iraq.

482. On July 16, 2009, Carlos Wilcox, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

483. Carlos Wilcox was killed in the attack.

484. The weapon used to kill Carlos Wilcox was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

485. Plaintiff Charlene Wilcox is a citizen of the United States and domiciled in the State of Minnesota. She is the mother of Carlos Wilcox.

486. Plaintiff Bianca Wilcox is a citizen of the United States and domiciled in the State of

487. Plaintiff Ona Wilcox is a citizen of the United States and domiciled in the State of Minnesota. She is the sister of Carlos Wilcox.

488. Plaintiff Charles Wilcox III is a citizen of the United States and domiciled in the State of Minnesota. He is the brother of Carlos Wilcox.

489. Plaintiff Charlene Wilcox brings an action individually and on behalf of the

490. Estate of Carlos Wilcox, as its legal representative.

491. As a result of the attack, and the death of Carlos Wilcox, Plaintiffs Charlene Wilcox, Bianca Wilcox, Ona Wilcox, and Charles Wilcox III have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

ATTACK 36: APRIL 22, 2011 – NUMANIYAH, IRAQ

QQ. The Vazquez Family

492. Omar Vazquez was a citizen of the United States when he was killed in Iraq.

493. On April 22 2011, Omar Vazquez, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

494. Omar Vazquez was killed in the attack.

495. The weapon used to kill Omar Vazquez was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

496. Plaintiff Maria Vazquez is a citizen of the United States and domiciled in the State of New Jersey. She is the mother of Omar Vazquez.

497. Plaintiff Pablo Vazquez is a citizen of Puerto Rico and domiciled in Sabana Hoyos. He is the father of Omar Vazquez.

498. Plaintiff Pablo Vazquez, Jr. is a citizen of Puerto Rico and domiciled in Orocovis. He is the step-brother of Omar Vazquez.

499. Plaintiff Marisel Vazquez is a citizen of the United States and domiciled in the State of New Jersey. She is the step-sister of Omar Vazquez.

500. Plaintiff Javier Vazquez is a citizen of Puerto Rico and domiciled in Orocovis. He is the brother of Omar Vazquez.

501. Plaintiff Maria Vazquez brings an action individually and on behalf of the Estate of Omar Vazquez, as its legal representative.

502. As a result of the attack, and the death of Omar Vazquez, Plaintiffs Maria Vazquez, Pablo Vazquez, Pablo Vazquez, Jr., Marisel Vazquez, and Javier Vazquez have experienced severe mental anguish, extreme emotional pain and suffering, and the loss of their son and brother's society, companionship, comfort, advice and counsel.

ATTACK 37: JUNE 2, 2011 – BAGHDAD, IRAQ

RR. The Rzepa Family

503. Plaintiff Jason Rzepa is a citizen of the United States and domiciled in the State of Montana.

504. On June 2, 2011, Plaintiff Jason Rzepa, was serving in the U.S. military in Iraq.

505. Plaintiff Jason Rzepa was gunner in a three (3) vehicle convoy when an EFP exploded near his vehicle.

506. The weapon used to injure Plaintiff Jason Rzepa was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

507. As a result of the attack, Plaintiff Jason Rzepa lost both of his legs.

508. As a result of the attack, and the injuries he suffered, Plaintiff Jason Rzepa has experienced severe physical and mental anguish and extreme emotional pain and suffering.

509. Plaintiff Cassandra Rzepa is a citizen of the United States and domiciled in the State of Idaho. She is the ex-wife of Jason Rzepa.

510. Plaintiff C.R., a minor represented by his legal guardian Cassandra Rzepa, is a citizen

511. Plaintiff K.R., a minor represented by his legal guardian Adrian Davis, is a citizen of the United States and domiciled in the State of Idaho. He is the son of Jason Rzepa.

512. Plaintiff Ann Rzepa is a citizen of the United States and domiciled in the State of Idaho. She is the mother of Jason Rzepa.

513. Plaintiff David Shaidell is a citizen of the United States and domiciled in the State of Idaho. He is the brother of Jason Rzepa.

514. As a result of the attack, and the injuries suffered by Jason Rzepa, Plaintiff Jason Rzepa, Cassandra Rzepa, C.R., a minor, K.R., a minor, Ann Rzepa, and David Shaidell have experienced severe mental anguish and extreme emotional pain and suffering.

ATTACK 38: JULY 7, 2011 – BAGHDAD, IRAQ

SS. The Beyers Family

515. Nathan R. Beyers was a citizen of the United States when he was killed in Iraq.

516. On July 7, 2011, Nathan R. Beyers, was serving in the U.S. military in Iraq when an EFP detonated near his vehicle.

517. Nathan R. Beyers was killed in the attack.

518. The weapon used to kill Nathan R. Beyers was an Iranian-manufactured EFP provided to Iranian-funded and -trained terror operatives in Iraq.

519. Plaintiff Tim Beyers is a citizen of the United States and domiciled in the State of Colorado. He is the father of Nathan R. Beyers.

520. Plaintiff Sonja Beyers is a citizen of the United States and domiciled in the State of Colorado. She is the step-mother of Nathan R. Beyers.

521. Plaintiff Vanessa Beyers is a citizen of the United States and domiciled in the State of Washington. She is the widow of Nathan R. Beyers.

522. Plaintiff Tyler Beyers is a citizen of the United States and domiciled in the State of

523. Plaintiff E.B., a minor represented by her legal guardian, Vanessa Beyers, is a citizen of the United States and domiciled in the State of Washington. She is the daughter of Nathan R. Beyers.

524. Plaintiff Tim Beyers brings an action individually and on behalf of the Estate of Nathan R. Beyers, as its legal representative.

525. As a result of the attack, and the death of Nathan R. Beyers, Plaintiffs, Tim Beyers, Sonja Beyers, Tyler Beyers, Vanessa Beyers and E.B., a minor have experienced severe mental anguish, extreme emotional pain and suffering, and loss of their husband, son, and brother's society, companionship, comfort, advice and counsel.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

AGAINST DEFENDANT ON BEHALF OF EACH PLAINTIFF IDENTIFIED HEREIN WHO SURVIVED AN ACT OF INTERNATIONAL TERRORISM FOR DEFENDANT'S MATERIAL SUPPORT TO ACTS OF EXTRAJUDICIAL KILLING, TORTURE AND HOSTAGE TAKING THAT RESULTED IN PERSONAL INJURY UNDER 28 U.S.C. §1605A(c)

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

512. Plaintiffs identified in the foregoing paragraphs were grievously injured by Defendant's provision of material support (within the meaning of §1605A(h)(3)) to terror operatives in Iraq who engaged in extrajudicial killing and who injured Plaintiffs.

513. As a direct and proximate result of the willful, wrongful, and intentional acts of Defendant and its agents, Plaintiffs identified in the foregoing paragraphs were injured and endured severe physical injuries, extreme mental anguish, pain and suffering, loss of solatium, and economic losses.

514. Plaintiffs' compensatory damages include, but not limited to, their severe physical injuries, extreme mental anguish, pain and suffering, loss of solatium, and any economic

515. The conduct of Defendant was criminal, outrageous, extreme, wanton, willful, malicious, and a threat to the public warranting an award of punitive damages against Defendant pursuant to 28 U.S.C. §1605A(c).

SECOND CLAIM FOR RELIEF
**AGAINST DEFENDANT ON BEHALF OF THE ESTATES OF PLAINTIFFS
IDENTIFIED HEREIN FOR DEFENDANT'S MATERIAL SUPPORT TO ACTS OF
EXTRAJUDICIAL KILLING, TORTURE AND HOSTAGE TAKING THAT
RESULTED IN WRONGFUL DEATH UNDER 28 U.S.C. §1605A(c)**

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

517. The Estates of Plaintiffs listed in the foregoing paragraphs assert claims on behalf of the decedents who were grievously injured by Defendant's provision of material support (within the meaning of §1605A(h)(3)), to terror operatives in Iraq who engaged in the acts of extrajudicial killing that caused the decedents' deaths.

518. As a direct and proximate result of the willful, wrongful, and intentional acts of Defendant and its agents, the decedents listed in the foregoing paragraphs endured physical injury, extreme mental anguish, and pain and suffering that ultimately lead to their deaths.

519. Defendant is therefore liable for the full amount of Plaintiffs' compensatory damages, including physical injuries, extreme mental anguish, pain and suffering and any pecuniary loss (or loss of income to the estates).

520. Defendant's conduct was criminal, outrageous, extreme, wanton, willful, malicious, and constitutes a threat to the public warranting an award of punitive damages against Defendant pursuant to 28 U.S.C. §1605A(c).

THIRD CLAIM FOR RELIEF
**AGAINST DEFENDANT ON BEHALF OF THE FAMILIES OF PLAINTIFFS
IDENTIFIED HEREIN AS INJURED OR KILLED AS A RESULT OF DEFENDANT'S
MATERIAL SUPPORT TO ACTS OF EXTRAJUDICIAL KILLING, TORTURE AND
HOSTAGE TAKING FOR LOSS OF SOLATIUM AND INTENTIONAL INFLICTION
OF SEVERE EMOTIONAL DISTRESS UNDER 28 U.S.C. § 1605A(c)**

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

522. Defendant's acts in providing material support for acts of extrajudicial killing, torture, and hostage-taking were intended to inflict severe emotional distress on Plaintiffs.

523. As a result of Defendant's acts, the families of individuals identified in the foregoing paragraphs as injured or killed as a result of Defendant's acts in providing material support for acts of extrajudicial killing, torture, and hostage-taking have suffered severe emotional distress, extreme mental anguish, loss of sleep, loss of appetite, and other severe physical manifestations, as well as loss of solatium and other harms to be set forth to the trier of fact.

524. Defendant's conduct was criminal, outrageous, extreme, wanton, willful, malicious, and constitutes a threat to the public warranting an award of punitive damages against Defendant pursuant to 28 U.S.C. § 1605A(c).

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand:

- (a) Judgment for all Plaintiffs against Defendant for compensatory damages, including, but not limited to, physical injury, extreme mental anguish, pain and suffering, economic losses, and loss of solatium, in amounts to be determined at trial;
- (b) Judgment for Plaintiff Estates against Defendant for compensatory damages for wrongful death, including, but not limited to, physical injury, extreme mental anguish, pain and suffering, economic losses, and any pecuniary loss (or loss of income to the estates) in amounts to be determined at trial;
- (c) Judgment for all Plaintiffs against Defendant for punitive damages in an amount to be determined at trial;

