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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

ANSSAF ALI MAYO,

Plaintiff,

v.

ABRAHAM GOLAN,
ISAAC GILMORE, and
DALE COMSTOCK,

Defendants.

Case No. '25CV3651 LL AHG

**COMPLAINT FOR DAMAGES
AND INJUNCTIVE RELIEF**

DEMAND FOR JURY TRIAL

PRELIMINARY STATEMENT

1
2 1. This action arises out of the unlawful actions by Defendants Abraham
3 Golan, Isaac Gilmore, and Dale Comstock (collectively, the “Defendants”), who
4 were hired by the United Arab Emirates (“U.A.E.”) to carry out targeted
5 assassinations of perceived political opponents in Yemen starting in 2015.

6 2. In August 2015, Defendant Golan (“Golan”) founded and incorporated
7 Spear Operations Group LLC (“Spear”), a private military contractor corporation, in
8 Delaware. Golan quickly set about recruiting former members of the U.S. military,
9 including Defendant Gilmore (“Gilmore”), who joined as Spear’s chief operating
10 officer in October 2015.

11 3. At the time, both Golan and Gilmore resided in or near San Diego,
12 California, which they used as a base for their operation.

13 4. Together, Golan and Gilmore pitched prospective foreign sovereign clients
14 on an extraordinary service that went well beyond providing security or even
15 military support: targeted extrajudicial killings.

16 5. Spear, through Golan and Gilmore, reached an agreement with the U.A.E.
17 to carry out an assassination program targeting Yemeni leaders who opposed the
18 U.A.E.’s interests in Yemen. In exchange, Spear would receive \$1.5 million per
19 month, with bonuses for successful assassinations.

20 6. The U.S. Department of State, which regulates private U.S. companies that
21 provide military services to foreign nations, never granted Spear the authority to
22 provide targeted assassination services to another country, nor has it ever granted
23 any other U.S. corporation the authority to do so.

24 7. Yet, Golan has publicly acknowledged: “There was a targeted
25 assassination program in Yemen. I was running it. We did it. It was sanctioned by
26 the U.A.E. within the coalition.”

27 8. Golan recruited Defendant Comstock (“Comstock”) to join Spear in or
28 around December 2015 by flying him to San Diego so the two could meet in person.

1 9. During the meeting, at Golan's San Diego home, Golan informed
2 Comstock that Spear would be carrying out a targeted assassination program in
3 Yemen on behalf of the U.A.E. Golan asked Comstock to serve as the head of the
4 targeted assassination program. At the conclusion of the meeting, Golan put \$40,000
5 on the table. Comstock took the money, accepted the position, and agreed to
6 participate in the assassination program.

7 10. Defendants recruited approximately a dozen other individuals to Spear,
8 including other former members of the U.S. military.

9 11. On December 14, 2015, Defendants and the Spear team met in person to
10 discuss the targeted assassination program in Yemen. This meeting took place in the
11 United States. At the meeting, each of the participants agreed to proceed with the
12 targeted killings, including each of the Defendants (the "Spear Assassination
13 Team").

14 12. On December 15, 2015, the Spear Assassination Team boarded a chartered
15 plane from Teterboro Airport in New Jersey dressed in military tactical gear. They
16 flew to the U.A.E. and then ultimately onto Aden in Yemen, where they arrived on
17 or about December 16, 2015.

18 13. Upon arrival, the Spear Assassination Team received a kill list from a
19 uniformed Emirati officer, which Gilmore described as "23 cards with 23 names and
20 23 faces."

21 14. At the top of the kill list was Plaintiff Anssaf Ali Mayo ("Plaintiff"), a
22 civilian who was a member of Yemen's House of Representatives and the Chairman
23 of the al-Islah party in Aden, Yemen's second-largest political party.

24 15. According to Defendants' own statements and drone surveillance footage
25 of the event, on December 29, 2015, the Spear Assassination Team tracked Plaintiff
26 to his political party's headquarters and attempted to assassinate him by detonating a
27 powerful explosive device on the building's front door.

28 16. Plaintiff survived the assassination attempt, but was forced to flee the

1 country and has lived in exile since Defendants tried to kill him.

2 17. The Spear Assassination Team continued its campaign of assassinations in
3 Yemen at the behest of the U.A.E. and was, according to Golan, responsible for a
4 number of high-profile assassinations that followed.

5 18. In October 2018, public reporting by BuzzFeed News first detailed
6 Defendants' targeted assassination program in Yemen. Golan and Gilmore were
7 interviewed for the article and conceded their involvement in the campaign of
8 killings in Yemen at the behest of the U.A.E., including Plaintiff's attempted
9 assassination.¹

10 19. In January 2024, the BBC published a video documentary with additional
11 reporting on Defendants' targeted assassination program in Yemen. The BBC
12 documentary includes video interviews with Gilmore and Comstock, in which they
13 both admitted their involvement in the campaign of killings in Yemen at the behest
14 of the U.A.E., including Plaintiff's attempted assassination.²

15 20. This is an action for compensatory and punitive damages for torts in
16 violation of the Alien Tort Statute, 28 U.S.C. § 1350 and the California Code of
17 Civil Procedure § 354.8.

18 PARTIES

19 21. Plaintiff Anssaf Ali Mayo is a Yemeni citizen who resides in exile in
20 Saudi Arabia. He has a bachelor's degree in accounting and has been a member of
21 the Yemeni House of Representatives since April 27, 2003, representing Electoral
22

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24 ¹ Aram Roston, *A Middle East Monarchy Hired American Ex-Soldiers To Kill*
25 *Its Political Enemies. This Could Be The Future Of War*, BuzzFeed News (Oct. 16,
26 2018), [https://www.buzzfeednews.com/article/aramroston/mercenaries-](https://www.buzzfeednews.com/article/aramroston/mercenaries-assassination-us-yemen-uae-spear-golan-dahlan)
[assassination-us-yemen-uae-spear-golan-dahlan](https://www.buzzfeednews.com/article/aramroston/mercenaries-assassination-us-yemen-uae-spear-golan-dahlan).

27 ² BBC World Service, *American mercenaries hired by UAE to kill in Yemen -*
28 *BBC World Service Documentaries*, YouTube (Jan. 23, 2024),
<https://www.youtube.com/watch?v=Z51MTI9sbFY>.

1 District No. 20 in Aden. In 2015, at the time of Defendants' assassination attempt,
2 Plaintiff was serving as the al-Islah party Chairman in Aden. In 2020, Plaintiff was
3 elected to serve as Chairman of the Arab Parliament's Economic and Financial
4 Affairs Committee. Plaintiff, as a representative of the al-Islah party, has taken part
5 in the U.N. peace process for Yemen and has personally met with the United
6 Nations Special Envoy to Yemen and the U.S. Ambassador to Yemen, including as
7 recently as October 2025.

8 22. Gilmore is a U.S. citizen and a resident of San Diego, California. Gilmore
9 served as a non-commissioned officer in the U.S. Navy SEAL Team until his
10 discharge in 2011. Gilmore joined Spear in October 2015 and served as its chief
11 operating officer until April 2016.

12 23. Golan is an Israeli-Hungarian citizen and a resident of Westport,
13 Connecticut. Golan founded Spear in August 2015 and served as its chief executive
14 officer. Before and at the time of the events alleged in this complaint, Golan was a
15 resident of Rancho Santa Fe, in San Diego County, California where he owned at
16 least two homes. He has also been associated with at least three other residences in
17 California.

18 24. Comstock is a U.S. citizen and resident of Indonesia. Comstock was
19 previously a member of the U.S. Army Special Forces. After retiring from military
20 service, Comstock worked as a contractor for the U.S. government between 2001
21 and 2011. Comstock joined Spear in 2015 and served as the head of operations for
22 its targeted assassination program.

23 JURISDICTION AND VENUE

24 25. This Court has subject matter jurisdiction over Plaintiff's claim for war
25 crimes as a tort in violation of the law of nations under the Alien Tort Statute, 28
26 U.S.C. § 1350.

27 26. This Court has subject matter jurisdiction over Plaintiff's claim for
28 attempted extrajudicial killing as a tort in violation of the law of nations under the

1 Alien Tort Statute, 28 U.S.C. § 1350.

2 27. This Court has subject matter jurisdiction over Plaintiff's claim for crimes
3 against humanity as a tort in violation of the law of nations under the Alien Tort
4 Statute, 28 U.S.C. § 1350.

5 28. This Court has supplemental jurisdiction over Plaintiff's California state
6 law tort claims under supplemental jurisdiction pursuant to 28 U.S.C. § 1367.

7 29. This Court has personal jurisdiction over Gilmore because, on information
8 and belief, Gilmore is a resident of San Diego County, California.

9 30. This Court has personal jurisdiction over Golan because, on information
10 and belief, Golan was a resident of San Diego County, California at the time of the
11 incidents giving rise to Plaintiff's claims, a substantial part of his actions giving rise
12 to the claim occurred in California, and exercising jurisdiction is consistent with the
13 Constitution and United States law.

14 31. This Court has personal jurisdiction over Comstock pursuant to Fed. R.
15 Civ. P. 4(k)(2) because the claims arise under federal law, Comstock is not subject
16 to jurisdiction in any state's courts of general jurisdiction, and exercising
17 jurisdiction is consistent with the Constitution and United States law.

18 32. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because
19 a substantial part of the events or omissions giving rise to the claim occurred in this
20 District. Alternatively, if venue is not proper in this District pursuant to 28 U.S.C. §
21 1391(b)(1) or 28 U.S.C. § 1391(b)(2), venue is proper under 28 U.S.C. § 1391(b)(3)
22 as all Defendants are subject to the Court's personal jurisdiction with respect to this
23 civil action.

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1 U.A.E. to bypass the Strait of Hormuz, which Iran has frequently threatened to shut
2 down.

3 38. Finally, the U.A.E. wanted to extinguish al-Islah, a Yemeni political party
4 which the U.A.E. views as opposing its interests in Yemen. Al-Islah was founded in
5 1990 after the reunification of the north and south of Yemen. It is an internationally
6 recognized political party and its members have held numerous seats in Parliament.
7 Its leadership has met with the U.S. Ambassador to Yemen, and with diplomats
8 from France, Britain, Germany, and the European Union. Plaintiff, as a
9 representative of the al-Islah party has personally met with the United Nations
10 Special Envoy to Yemen and the U.S. Ambassador to Yemen, including as recently
11 as October 2025.

12 39. While coalition members, including the U.S., forged an alliance with al-
13 Islah to defeat the Houthis, the U.A.E. made the weakening of al-Islah one of its
14 primary goals in the conflict.

15 **B. The U.A.E.'s Persecution of Perceived Political Opponents in Yemen.**

16 40. The U.A.E. is an authoritarian monarchy that persecutes perceived
17 political opposition both in and out of its territory.

18 41. Political parties are banned in the U.A.E. where the 1980 Publications and
19 Publishing Law regulates the media and prohibits any form of political criticism.
20 According to Human Rights Watch, "U.A.E. authorities have launched a sustained
21 assault on freedom of expression and association since 2011. The U.A.E. arbitrarily
22 detains and forcibly disappears individuals who criticize the authorities within the
23 U.A.E.'s borders." It has detained hundreds of activists, civil society leaders, and
24 academics for offenses related to political dissent.

25 42. The U.A.E.'s persecution of perceived political dissidents extends beyond
26 its borders and into Yemen.

27 43. Starting in 2015, as part of its intervention in the Yemeni civil war, and to
28 this day, the U.A.E. uses paramilitary affiliates in Yemen, the Hadrami Elite Forces

1 and Security Belt Forces, to threaten and kidnap perceived opposition, particularly
2 al-Islah members, under the guise of “counterterrorism”.

3 44. When the Spear targeted assassination program began in late 2015, the
4 U.A.E. appeared to have effectively decided that the focus of its intervention in the
5 Yemeni civil war would be gaining control of the Port of Aden and a quiet
6 campaign against al-Islah. This campaign involved kidnapping and threatening al-
7 Islah supporters and assassinating al-Islah party members.

8 45. The U.S. Department of State’s 2017 human rights report on Yemen
9 states: “Local NGOs and media also reported that individuals tied with al-Islah have
10 been arbitrarily detained in Mukalla by U.A.E.-affiliated Security Belt forces.”

11 46. Amnesty International further concludes: “Critics of the coalition and the
12 practices of U.A.E.-backed security forces have been among those rounded up [by
13 the Security Belt and Elite Forces], including community figures, activists and
14 journalists, as well as sympathizers and members of the al-Islah Party.” Freedom
15 House affirmed that U.A.E. associated forces “have used arbitrary arrests,
16 detentions, and enforced disappearances to persecute” groups including members of
17 al-Islah in Yemen.

18 47. In 2019, the UN Group of Eminent International and Regional Experts on
19 Yemen (the “UN Group of Experts”) found that from 2017 to May 2018, “there
20 were a series of detentions, threats, assaults and obstructions of journalists, human
21 rights activists, and newspapers who had been critical of the United Arab Emirates,
22 Southern Transitional Council or Security Belt, or were perceived as being pro-al-
23 Islah.” The UN Group of Experts further states that it “found reasonable grounds to
24 believe that the United Arab Emirates are responsible for the 10 assassinations [in
25 Aden] it investigated, which amount to the human rights law violation of arbitrary
26 deprivation of life.”

27 48. The U.A.E. used its paramilitary forces in Yemen to threaten and detain al-
28 Islah supporters, and Spear provided a key component of its campaign to silence

1 their opponents in Aden—the targeted assassinations of al-Islah leadership, including
2 Plaintiff.

3 **C. Defendants’ Targeted Assassination Program in Yemen.**

4 *a. Defendants Recruited, Planned, and Jointly Agreed to Carry Out Their*
5 *Targeted Assassination Program From the United States.*

6 49. Golan founded and incorporated Spear, a private security contractor
7 company, in Delaware in August 2015.

8 50. Following Spear’s founding, Golan recruited Gilmore, a U.S. citizen and
9 resident and a former member of the U.S. military, who joined Spear as its chief
10 operating officer in October 2015.

11 51. Prior to joining Spear, Gilmore had been decommissioned from the U.S.
12 military in 2011 for accidentally shooting a Navy SEAL during a training exercise.
13 Gilmore has stated that he chose to join Spear because the accident had stained his
14 military career and that he was considered an outsider, unable to find more
15 traditional opportunities for former members of the military. When he joined Spear,
16 his last significant employment had been as an executive at an artisanal tequila
17 company.

18 52. In or about October 2015, Golan and Gilmore pitched and ultimately
19 reached an agreement with the U.A.E. that Spear would carry out a campaign of
20 targeted assassinations in Yemen on the U.A.E.’s behalf. In exchange, Spear would
21 be paid \$1.5 million per month plus bonuses for successful assassinations.

22 53. On information and belief, while in the United States, Golan and Gilmore
23 repeatedly reached out to U.S.-based individuals to recruit them to join Spear.

24 54. Golan and Gilmore specifically recruited other former members of the
25 U.S. military, whose U.S. military training and experience were key selling points in
26 their pitch to prospective sovereign clients, including the U.A.E.

27 55. Many of the former members of the U.S. military recruited by Golan and
28 Gilmore declined to join Spear given the nature of the services being offered.

1 56. The former U.S. military personnel who ultimately chose to join Spear in
2 December 2015 did so at rates of upwards of \$20,000 per month plus bonuses, well
3 above the market rate they would have received for typical private security work
4 abroad.

5 57. As part of his efforts to recruit Comstock to join Spear, Golan flew
6 Comstock to San Diego, California so the two could meet in person.

7 58. During the meeting, at Golan's San Diego home, Golan informed
8 Comstock that Spear would be carrying out a targeted assassination program in
9 Yemen on behalf of the U.A.E. Golan asked Comstock to serve as the head of the
10 targeted assassination program. At the conclusion of the meeting, Golan put \$40,000
11 on the table. Comstock took the money, accepted the position, and agreed to
12 participate in the assassination program.

13 59. Going forward, Spear paid Comstock an additional \$40,000 per month
14 plus bonuses to run the targeted assassination program.

15 60. On December 14, 2015, the Defendants gathered in person with the rest of
16 the Spear Assassination Team, approximately a dozen total members, near
17 Teterboro Airport in New Jersey. There, Golan, detailed the targeted assassination
18 program they would be carrying out in Yemen. Each of the participants was told
19 that, if they were no longer interested, they could keep the \$20,000 advance
20 payment they had already received and leave with no questions asked. None of the
21 participants quit. They all agreed to proceed with the targeted killings in Yemen,
22 including each of the Defendants.

23 61. Following their agreement to proceed, the Spear Assassination Team
24 packed military equipment, including body armor, communications gear, and
25 specialized tools to prepare blasting caps on explosives, which they brought with
26 them to Yemen.

27 62. On information and belief, this same equipment was used in carrying out
28 assassinations in Yemen, including Plaintiff's assassination attempt on December

1 29, 2015.

2 63. Following their arrival in Yemen, Golan and Gilmore continued to recruit
3 former members of the U.S. military based in the U.S., a number of whom later
4 traveled to Yemen and integrated into the Spear Assassination Team.

5 64. On information and belief, the U.A.E. transferred funds to Spear and
6 Golan's U.S. bank accounts for the work of the Spear Assassination Team in
7 Yemen.

8 65. On information and belief, Spear and Golan transferred funds from their
9 U.S. bank accounts to the U.S. bank accounts of members of the Spear
10 Assassination Team for the killings carried out in Yemen.

11 66. At all relevant times, Spear continued to enter into contracts with U.S.-
12 based individuals and businesses to support its work on behalf of the U.A.E.

13 67. For example, on March 8, 2016, Spear entered into a service contract with
14 Fadi Elsalameen, a U.S. citizen. The service contract, which states that its provisions
15 are governed by U.S. law, provides that Elsalameen would assist in expanding Spear
16 and Golan's current business with the U.A.E. In exchange, Spear agreed to pay
17 Elsalameen a monthly retainer of \$20,000, a \$50,000 signing bonus, and twenty
18 percent of all revenue that Spear collected from the U.A.E. Golan served as a
19 personal guarantor to the service agreement.

20 68. Defendants' agreement to carry out and their implementation of the
21 targeted assassinations in Yemen violate U.S. federal criminal statutes, namely the
22 War Crimes Act (18 U.S.C. § 2441) and Conspiracy to Kill, Kidnap, Maim, or
23 Injure Persons or Damage Property in a Foreign Country (18 U.S.C. § 956).³

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25 ³ Ryan Goodman & Sarah Knuckey, *Justice Department Must Open Criminal*
26 *Investigation Into Potential War Crimes by U.S. Mercenaries in Yemen*, Just
27 Security (Oct. 16, 2018), [https://www.justsecurity.org/61091/u-s-justice-](https://www.justsecurity.org/61091/u-s-justice-department-open-criminal-investigation-potential-war-crimes-u-s-mercenaries-yemen/)
28 [department-open-criminal-investigation-potential-war-crimes-u-s-mercenaries-](https://www.justsecurity.org/61091/u-s-justice-department-open-criminal-investigation-potential-war-crimes-u-s-mercenaries-yemen/)
[yemen/](https://www.justsecurity.org/61091/u-s-justice-department-open-criminal-investigation-potential-war-crimes-u-s-mercenaries-yemen/).

1 69. Further, under the Arms Control Export Act (AECA) and the International
2 Traffic in Arms Regulations (ITAR), a U.S. contractor must seek licensure by the
3 State Department for the export of military services. There is no indication that
4 Defendants sought such approval, let alone that it was granted.

5
6 *b. Once in Yemen, Defendants Carried out their Targeted Assassination*
7 *Program on Behalf of the U.A.E.*

8 70. Following the Spear Assassination Team's arrival in Yemen on December
9 16, 2015, Defendants were principally based in Yemen until at least late March
10 2016.

11 71. Golan has stated that he was told that the goal of Spear's work in Yemen
12 was to disrupt and destroy the al-Islah political party.

13 72. Upon arrival, U.A.E. officials gave the Spear Assassination Team an
14 initial kill list, featuring "23 cards, with 23 names and 23 pictures" of targets in
15 Yemen.

16 73. Each card contained only rudimentary intelligence about the target listed.
17 Gilmore has conceded that the Spear Assassination Team did not question the
18 information provided by U.A.E. officials and that some of the targets may have been
19 people who merely fell out of favor with the U.A.E.'s ruling family.

20 74. Golan and Gilmore, the two Spear corporate officers, also received official
21 designations within the Emirati Armed Forces. Golan was named a colonel and
22 Gilmore a lieutenant colonel.

23 75. Gilmore and Golan requested that they be incorporated into the U.A.E.
24 Armed Forces under the erroneous belief that doing so would shield them from legal
25 liability for their otherwise unlawful actions.

26 76. Once in Yemen, the Spear Assassination Team undertook its campaign of
27 assassinations and was, according to Golan and Comstock, responsible for several
28 high-profile assassinations in Yemen.

1 77. After the Spear Assassination Team began operating in Yemen, there was
2 a surge in the assassination of Yemeni civilians who were perceived to be opposed
3 to the U.A.E.'s interests. One member of the UN Group of Experts estimated that, as
4 2016 progressed, members of the al-Islah party were "dying at an alarming rate".

5 78. Upon information and belief, the Spear Assassination Team continued to
6 operate in Yemen after late March 2016 and received additional kill lists targets
7 from U.A.E. officials.

8 79. The Spear Assassination Team also trained individuals based locally,
9 including Yemeni men from U.A.E.-controlled detention and torture centers, to
10 carry out assassinations to further aid the U.A.E. in its targeting of perceived
11 political opponents in Yemen.

12 **D. The Attempt to Kill Plaintiff (December 29, 2015).**

13 80. Each Defendant has admitted that they participated in the assassination
14 attempt on Plaintiff in Yemen.

15 81. Golan and Gilmore have stated that Plaintiff, who served as the al-Islah
16 party Chairman in Aden, was at the top of the deck of targets they received from the
17 U.A.E. They both acknowledged that they participated in and were present during
18 his assassination attempt.

19 82. Comstock admitted to planning the attack on Plaintiff and stated that he
20 participated in and was present during the assassination attempt.

21 83. On December 29, 2015, after having tracked Plaintiff's daily movements,
22 the Defendants agreed to a plan to assassinate Plaintiff by setting off explosives at
23 the al-Islah political party headquarters, located near a soccer stadium in Aden. The
24 explosion was intended to kill everybody in the party headquarters, including
25 Plaintiff. The Spear Assassination Team, including Defendants, then planned to
26 finish off any survivors through small arms fire.

27 84. On the evening of December 29, 2015, the Spear Assassination Team,
28 including Defendants, received surveillance information from an informant and

1 from infrared drone footage that Plaintiff was present at the al-Islah political party
2 headquarters. They set out from their base of operations in two armored SUVs to
3 carry out Plaintiff's targeted assassination. They were accompanied by an Emirati
4 soldier who served as a driver for one of the SUVs.

5 85. When they arrived at the al-Islah headquarters, the Spear Assassination
6 Team crept out of their SUV, firearms at the ready and carrying an explosive charge
7 loaded with shrapnel. According to Defendants' own accounts and drone footage of
8 the assassination attempt, Comstock placed the explosive charge on the door of the
9 al-Islah political party headquarters and detonated the charge, creating a massive
10 explosion that destroyed portions of the building. Members of the Spear
11 Assassination Team also opened fire in and around the al-Islah political party
12 headquarters.

13 86. While the Spear Assassination Team specifically targeted Plaintiff, they
14 carried out the assassination attempt without regard to whether any other civilians
15 would also be harmed. As stated by Comstock, who built, placed, and detonated the
16 powerful explosive device used in Plaintiff's assassination attempt: "I was gonna try
17 to open the door, throw a couple hand grenades in there, and then just go in there
18 and shoot everybody."

19 87. On information and belief, at the time, the Spear Assassination Team
20 believed it had successfully carried out Plaintiff's assassination as planned.

21 88. Following the assassination attempt, the Spear Assassination Team
22 withdrew from the area, after booby-trapping one of their SUVs to cover their tracks
23 and add to the destruction near the al-Islah political party headquarters.

24 89. Unbeknownst to Defendants however, Plaintiff had been informed that his
25 life was in danger and had fled the al-Islah political party headquarters minutes
26 before the assassination attempt.

27 90. Plaintiff suffered psychological and emotional trauma knowing that
28 Defendants were en route to assassinate him and then attempted to do so.

1 91. Plaintiff was forced to leave Yemen given the attempt on his life. On
2 January 1, 2016, just three days after the attack, Plaintiff fled to Saudi Arabia, where
3 he remains in exile.

4 92. Since 2016, Plaintiff lives separated from his wife and children, who
5 continue to reside in Yemen. For the past decade, Plaintiff sees his family in person
6 only once a year on average, often in a third country to which they can all travel.

7 93. Plaintiff's ability to carry out his work as a member of al-Islah's political
8 leadership was also impacted by the attempt on his life. Plaintiff has been unable to
9 return to Yemen other than on a handful of occasions, and only with special security
10 measures in place.

11 94. Following Plaintiff's attempted assassination, Defendants continued to
12 carry out targeted assassinations in Yemen with impunity.

13 95. Local Yemeni authorities opened an investigation into Plaintiff's
14 assassination attempt. Following the assassination attempt, the local criminal
15 investigation unit and police arrived after the explosion, took witness statements,
16 and inspected what was left of the Spear Assassination Team's vehicle. Plaintiff also
17 contacted the local security forces and the Minister of the Interior to ask them to
18 investigate the incident. However, there was little progress in these investigations.

19 96. Yemen submitted a complaint to the Inter-Parliamentary Union, an
20 international organization of national parliaments, on Plaintiff's behalf. Nothing
21 came of this complaint.

22 97. In 2018, when the BuzzFeed News article was published identifying that
23 Spear and Defendants Golan and Gilmore had conducted the attempted assassination
24 on behalf of the U.A.E., the investigations became too politically sensitive and
25 dangerous to continue in Yemen. Plaintiff asked the Yemeni Parliament to issue a
26 statement requesting an investigation into the targeted killings in Aden. Because of
27 the sensitivities regarding U.A.E. involvement, no parliamentarians were willing to
28 participate.

1 98. To date, the Yemeni investigation into Plaintiff's assassination attempt has
2 not progressed, nor have there been any prosecutions or convictions. Similarly, all
3 attempts to seek justice in national courts by families of victims in similar incidents
4 in Aden have been unsuccessful. Even if the cases are still pending years later, they
5 are at a standstill and have not progressed past the preliminary stages.

6 99. The Yemeni judicial system is ill-equipped to handle these types of
7 complex investigations and prosecution, particularly where, as here, they involve
8 targeted assassinations carried out by foreigners, all of whom have since left Yemen
9 and its jurisdiction.

10 100. Defendants left Yemen following the targeted assassinations campaign
11 they carried out on behalf of the U.A.E., including the attempt on Plaintiff's life.

12 **FIRST CLAIM FOR RELIEF**

13 **ATTEMPTED MURDER AS A WAR CRIME**

14 **UNDER THE ALIEN TORT STATUTE (28 U.S.C. § 1350)**

15 **(All Defendants)**

16 101. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

17 102. The acts alleged herein constitute attempted murder as a war crime, a "tort
18 . . . committed in violation of the laws of nations or a treaty of the United States"
19 under the Alien Tort Statute, 28 U.S.C. § 1350. Attempted murder violates
20 customary international law prohibiting war crimes as reflected, expressed, defined,
21 and codified in multilateral treaties and other international instruments, international
22 and domestic judicial decisions, and other authorities, including the War Crimes Act
23 (18 U.S.C. § 2441).

24 103. Since 2014, Yemen has been engaged in a non-international armed
25 conflict. Defendants' attempt to kill Plaintiff was committed in the context of, and
26 associated with, a non-international armed conflict as described in paragraphs 33-34.

27 104. Defendants were aware of the factual circumstances that established the
28 existence of a non-international armed conflict, in part because they were

1 combatants in the armed conflict in Yemen.

2 105. Defendants attempted to murder Plaintiff on behalf of the U.A.E. in
3 violation of the laws governing non-international armed conflicts, including the
4 prohibition against murdering civilians.

5 106. At all relevant times described herein, Plaintiff was a civilian taking no
6 active part in hostilities and therefore protected under the laws governing non-
7 international armed conflict. Defendants knew that Plaintiff was a civilian.

8 107. Defendants also conspired with the other members of the Spear
9 Assassination Team to murder Plaintiff on behalf of the U.A.E. An actual or tacit
10 agreement existed between Defendants and other members of the Spear
11 Assassination Team to murder Plaintiff.

12 108. Further, in targeting Plaintiff, Defendants aided and abetted the other
13 members of the Spear Assassination Team who knew of, and/or otherwise intended
14 to participate in Plaintiff's attempted assassination on behalf of the U.A.E.

15 109. Defendants' acts and omissions directly and proximately caused Plaintiff
16 to suffer severe and ongoing mental pain and suffering.

17 110. Plaintiff has suffered damages in an amount to be determined at trial as a
18 result of the attempted murder as a war crime.

19 111. Defendants' acts and omissions were deliberate, willful, intentional,
20 wanton, malicious, and oppressive, and should be punished by an award of punitive
21 damages in an amount to be determined at trial.

22 **SECOND CLAIM FOR RELIEF**

23 **ATTEMPTED EXTRAJUDICIAL KILLING**

24 **UNDER THE ALIEN TORT STATUTE (28 U.S.C. § 1350)**

25 **(All Defendants)**

26 112. Plaintiff re-alleges and incorporates by reference the preceding paragraphs.

27 113. The acts committed against Plaintiff by Defendants during their attack on
28 December 29, 2015 constitute an attempted extrajudicial killing, a "tort . . .

1 committed in violation of the laws of nations or a treaty of the United States” under
2 the Alien Tort Statute, 28 U.S.C. § 1350. Attempted extrajudicial killing violates
3 customary international law as reflected, expressed, defined, and codified in
4 multilateral treaties and other international instruments, international and domestic
5 judicial decisions, and other authorities.

6 114. Defendants attempted to extrajudicially kill Plaintiff on behalf of the
7 U.A.E.

8 115. Defendants also conspired with the other members of the Spear
9 Assassination Team to extrajudicially kill Plaintiff on behalf of the U.A.E. An actual
10 or tacit agreement existed between Defendants and the other members of the Spear
11 Assassination Team to attempt to extrajudicially kill Plaintiff.

12 116. Further, in targeting Plaintiff, Defendants aided and abetted the other
13 members of the Spear Assassination Team who knew of, and/or otherwise intended
14 to participate in Plaintiff’s attempted extrajudicial killing on behalf of the U.A.E.

15 117. Defendants’ acts and omissions directly and proximately caused Plaintiff
16 to suffer severe and ongoing mental pain and suffering.

17 118. Plaintiff has suffered damages in an amount to be determined at trial as a
18 result of the attempt to extrajudicially kill him.

19 119. Defendants’ acts and omissions were deliberate, willful, intentional,
20 wanton, malicious, and oppressive, and should be punished by an award of punitive
21 damages in an amount to be determined at trial.

22 **THIRD CLAIM FOR RELIEF**

23 **PERSECUTION AS A CRIME AGAINST HUMANITY**

24 **UNDER THE ALIEN TORT STATUTE (28 U.S.C. § 1350)**

25 **(All Defendants)**

26 120. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

27 121. The acts alleged herein constitute the crime against humanity of
28 persecution on discriminatory grounds, a “tort . . . committed in violation of the laws

1 of nations or a treaty of the United States” under the Alien Tort Statute, 28 U.S.C. §
2 1350. Persecution as a crime against humanity violates customary international law
3 prohibiting crimes against humanity as reflected, expressed, defined, and codified in
4 multilateral treaties and other international instruments, international and domestic
5 judicial decisions, and other authorities.

6 122. Since at least 2015, the U.A.E. has engaged in a widespread or systematic
7 attack directed against a civilian population, namely perceived political opponents in
8 Yemen, including members of the al-Islah political party as described in paragraphs
9 38-48.

10 123. Defendants knew of and participated in the U.A.E.’s widespread or
11 systematic attack against the civilian population in Yemen.

12 124. As part of this widespread or systematic attack, Defendants targeted
13 Plaintiff on behalf of the U.A.E. because of Plaintiff’s political affiliation, as the al-
14 Islah party Chairman in Aden.

15 125. Defendants conspired with U.A.E. officials to persecute Plaintiff. An
16 actual or tacit agreement existed between Defendants, U.A.E. officials, and the other
17 members of the Spear Assassination Team to target perceived political opponents in
18 Yemen, including members of the al-Islah party. Defendants developed and
19 implemented a targeted assassination campaign in Yemen to facilitate the U.A.E.’s
20 persecution of these perceived political opponents, including Plaintiff.

21 126. In targeting Plaintiff, the U.A.E. was aided and abetted by Defendants who
22 knew of, and/or otherwise intended to participate in, the widespread or systematic
23 attack committed by the U.A.E. against perceived political opponents in Yemen,
24 including the targeted assassination of Plaintiff.

25 127. The acts and omissions of Defendants directly and proximately caused
26 Plaintiff to suffer severe and ongoing mental pain and suffering.

27 128. Plaintiff has suffered damages in an amount to be determined at trial as a
28 result of his persecution as a crime against humanity.

1 129. The acts and omissions of Defendants were deliberate, willful, intentional,
2 wanton, malicious, and oppressive, and should be punished by an award of punitive
3 damages in an amount to be determined at trial.

4 **FOURTH CLAIM FOR RELIEF**

5 **ASSAULT AND BATTERY**

6 **UNDER CALIFORNIA CODE OF CIVIL PROCEDURE (§ 354.8)**

7 **(All Defendants)**

8 130. Plaintiff re-alleges and incorporates by reference the preceding paragraphs.

9 131. The acts committed against Plaintiff by Defendants during the
10 assassination attempt on December 29, 2015 constitute an assault and battery
11 pursuant to California Code of Civil Procedure § 354.8 given that the conduct
12 constitutes:

- 13 i) A war crime, as defined in Section 2441 of Title 18 of the United States
14 Code;
15 ii) An attempted extrajudicial killing, as defined in Section 3(a) of Public
16 Law 102-256; and/or
17 iii) Persecution as a crime against humanity.

18 132. Defendants' acts directly and proximately caused Plaintiff to suffer severe
19 and ongoing mental pain and suffering.

20 133. Plaintiff is entitled to damages in amounts to be determined at trial as a
21 result of the assassination attempt described herein.

22 134. Defendants' acts were deliberate, willful, wanton, malicious, and
23 oppressive and should be punished by an award of punitive damages in an amount to
24 be determined at trial.

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1 **PRAYER FOR RELIEF**

2 To the extent permitted by law, Plaintiff seeks the following relief against

3 Defendants:

- 4 (a) Compensatory damages;
- 5 (b) Punitive damages;
- 6 (c) Injunctive relief, including an order that Defendants cease taking any
- 7 actions relating to targeting Plaintiff for assassination or other harms;
- 8 (d) Reasonable attorneys' fees, costs and expenses; and,
- 9 (e) Such other and further relief as the Court may deem just and proper.

10 Plaintiff requests a trial by jury for each claim for relief and all triable issues.

11

12 Dated: December 18, 2025

By:

13 /s/ Daniel McLaughlin

14 Daniel McLaughlin (SBN: 315326)

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