

Reinaldo Aguiar, Pro-se  
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*Pro-se and on behalf of the Class*

OFFICE OF THE ATTORNEY GENERAL OF COLORADO

REINALDO AGUIAR, individually and on  
behalf of all others similarly situated,  
Plaintiff,

vs.  
ELON MUSK, an individual residing in California and Texas  
PIERRE OMIDYAR, an indivual residing in France and Iran  
VLADIMIR PUTIN, President of Russia  
DONALD TRUMP, President of the United States of America  
XI JINPING, President of China  
MASOUD PEZESHKIAN, President of Iran  
NARENDRA MODI, President of India  
MIGUEL DÍAZ-CANEL, President of Cuba  
NICOLAS MADURO MOROS, an individual residing in Caracas, Venezuela  
DIOSDADO CABELLO, an individual residing in Caracas, Venezuela  
DAVID F. HINE, An attorney residing in Ohio and Partner at the Law Firm Vorys.com  
WILMER RUPERTI, and individual residing in Florida and New York  
PEDRO LUIS MARTIN-OLIVARES, an individual residing in Caracas, Venezuela  
VLADIMIR PADRINO LÓPEZ, an individual residing in Caracas, Venezuela  
JESUS ALFREDO ITRIAGO, an individual residing in Caracas, Venezuela  
CLÍVER ANTONIO ALCALÁ CORDONES, an individual residing in Caracas, Venezuela  
HUGO ARMANDO CARVAJAL BARRIOS, an individual residing in Caracas, Venezuela  
TARECK ZAIDAN EL AISSAMI MADDAH, an individual residing in Caracas, Venezuela  
RODOLFO MCTURK-MORA, an individual residing in Caracas, Venezuela  
ROBERTO RINCON, an individual residing in Houston, TX  
RODRIGO RINCON, an individual residing in Houston, TX  
TRAVIS KALANICK, an individual residing in New York City, NY and Los Angeles, CA.  
PIERRY OMIDYAR, an individual residing in France and Iran  
EDYLBERTO MOLINA MOLINA, an individual wanted by the DEA residing in Germany  
GLORY PEREZ, an employee of the Organization of American States residing in Washington D.C.  
PETER THIEL, an individual residing in California  
ERIC ADAMS, Mayor Of New York City  
DAVID M. SOLOMON, an individual residing in New York City  
ROBERT GATES, an individual residing in California  
PETER BRIAN HEGSETH, an individual residing in Tennessee  
RUSSEL SIMMONS , an individual residing in the United States of America  
MAXIM TARASIOUK, an individual residing in Calgary, Alberta, Canada  
JAWED KARIM, an individual residing in the United States of America  
JEREMY STOPPELMAN, an individual residing in the United States of America  
ANDREW MCCORMACK, an individual residing in the United States of America  
PREMAL SHAH, an individual residing in the United States of America  
LUKE NOSEK, an individual residing in the United States of America  
KENNY HOWERY, an individual residing in the United States of America  
DAVID SACKS, an individual residing in the United States of America  
KEITH RABOIS, an individual residing in the United States of America  
REID HOFFMAN, an individual residing in the United States of America  
MAX LEVCHIN, an individual residing in the United States of America  
RAELOF BOTHA, an individual residing in the United States of America

YU PAN, an individual residing in the United States of America  
MICHAEL HUGHES, an individual residing in New York, NY  
FRANCISCO CASTILLO, an individual residing in Katy, TX  
MANSUR a/k/a MANZUR, an individual residing in Katy, TX  
EBAY, a public company based in the United States of America  
PAYPAL, a public company based in the United States of America  
UBER, a public company based in the United States of America  
STARLINK, a subsidiary of SpaceX and an Internet Service Provider  
WEBMD, a private company owned by KKR & Co. Inc.  
MEDSCAPE, a company based in the United States of America  
KKR & Co. Inc., a public company traded on the New York Stock Exchange  
DEFINITIVE HEALTHCARE CORP., a Delaware Corporation  
DEFINITIVE HEALTHCARE HOLDINGS, LLC, a Delaware Limited Liability Company  
POST OAK PROPERTY MANAGEMENT, a property management company located in Houston, TX  
LAKE POINT ESTATES HOME OWNERS ASSOCIATION, a home owners association located in Katy, TX  
PRIDDY MICHAEL JR & SARAH, individuals residing at 26718 Valleyside Drive, Katy, Texas 77494  
CHEN YUE J & BEIGE LIU, individuals residing at 26711 Valleyside Drive, Katy, Texas 77494  
WANG SHU & YAN, individuals residing at 26707 Valleyside Dr, Katy, TX 77494  
O'SULLIVAN KATHERINE & RYAN, individuals residing at 26706 Valleyside Dr, Katy, TX 77494  
CHRISTOPHER RAY BONNER, an individual residing at 2310 Britton Ridge Dr. Katy, Texas 77494  
XU YINGYING & LUYIN ZHAO, individuals residing at 2218 Britton Ridge Dr. Katy, Texas 77494  
PHILLIP E DENNING, an individual residing at 2227 Braer Ridge Dr., Katy, TX

**Defendants, collectively “The PayPal Mafia”**

Plaintiff Reinaldo Aguiar, individually and on behalf of all persons similarly situated, alleges the following:

1. Plaintiff Reinaldo Aguiar (“Plaintiff”) brings this action on his own behalf and as a class action for the benefit of a Class consisting of Relatives and Friends of Co-founders, Employees, Contractors and Collaborators of Key Opinion Leaders LLC, whose electronic communications and whereabouts were unwillingly intercepted, accessed, monitored, and/or transmitted by Defendants, and were not acting as agents of the Defendants.
2. Upon information and belief, the Defendants operate a network of Public and Private companies that: i) Have access to combined assets exceeding 10 Trillion US Dollars; ii) Have access to hundreds of world-class attorneys; and iii) As alleged, employ the services of Foreign Intelligence Services, Foreign Military Forces and have access to Foreign Government Officials.
3. Considering the disparity of resources and access to legal expertise between the Plaintiff and Defendants, Plaintiff respectfully submits to your office that the Country, the great State of Colorado, the Public and the Class would be better served if this class action was brought forward by the Office of the Attorney General of Colorado than if brought forward privately by Plaintiff.
4. Plaintiff and the Class seek protective measures to protect Plaintiff and members of the Class from assesination attempts and threats of violence by Defendants and their agents. Plaintiff and the Class seek protection after three documented attempts against Plaintiff’s life.
5. **Platiff and the Class seek relief for Registered voters residing in the state of Colorado. Upon information and belief, the Defendants employed a vast network consisting of thousands of unregistered foreign agents and illegal network interception devices to i) Spy on Government officials in departments overseeing the elections in Colorado; and ii) Alter the election results in the state of Colorado and other states during the US Presidential Elections that took place on November of 2024.**
6. **Upon information and belief, the majority of foreign agents employed by Defendants are predominantly originary from the following countries: China, Venezuela, Cuba, Iran, India and Russia.**
7. Upon information and belief, Wilmer Ruperti and Maroil Trading Inc., operate a sophisticated ligistics operation involving cargo transfers at open sea, to: i) enable Iran, North Korea and Venezuela to evade economic and trade sanctions with emphasis on crude oil and refined oil products; ii) split and redistribute large shipments of illicit drugs into multiple vessels, to make the supply chain more efficient and avoid detection.
8. Upon information and belief, defendents operate a human trafficking network targeting illegal immigrants.
9. Upon information and belief, defendents operate a sex trafficking network targeting children and adults.

10. Plaintiff and the Class, respectfully submit a video recording detailing how was the geo-index that the criminal organization uses to coordinate a vast majority of their activities and assets:  
<https://youtu.be/E8dQy2qdYXE?si=SHs0PWswQqf7iuGC&t=73>
11. Plaintiff and the Class, respectfully submit an audio recording that summarizes the structure of the group:  
[https://storage.googleapis.com/omidyar-kalanick-evil-app/01\\_Audio/02-13-2025-SpyHELL\\_Elon%20Musk-PayPal%20Mafia-and-Global-Espionage-Network.wav](https://storage.googleapis.com/omidyar-kalanick-evil-app/01_Audio/02-13-2025-SpyHELL_Elon%20Musk-PayPal%20Mafia-and-Global-Espionage-Network.wav)
12. Plaintiff and the Class, respectfully submit the full archive of Key Opinion Leader's private investigation into the operations of the criminal organization:  
<https://storage.googleapis.com/omidyar-kalanick-evil-app/keyopinionleaders-notable-posts-archive.zip>
13. Plaintiff and the Class seek injunctive relief and damages caused by Defendants' unlawful invasion of privacy and interception of private conversations, electronic communications, audio, images, trade secrets, medical records, insurance records, banking statements, banking transactions, mortgage applications, credit applications, securities transactions in violation of the Federal Wiretap Act as amended by the Electronic Communications Privacy Act (the "ECPA"), the Texas Data Privacy and Security Act (TDPSA), the Federal Stored Communication Act (the "SCA"), the Texas Unfair Competition statutes, the Computer Fraud and Abuse Act (the "CFAA"), the Economic Espionage Act (the "EEA"), the Health Insurance Portability, Accountability Act (the "HIPAA"), the Gramm-Leach-Bliley Act (the "GLBA") and common law invasion of privacy.
14. Plaintiff is one of the co-founders of Key Opinion Leaders LLC and a former employee of Google Inc., specializing in *Search Ranking Algorithms*. Plaintiff is also an inventor as defined by the US Patents Office (the "USPO"), and named as the sole inventor in two patents owned by Google Inc.
15. Key Opinion Leaders LLC operates the website [www.keyopinionleaders.com](http://www.keyopinionleaders.com) that was designed to provide the Public with algorithmically ranked lists of Medical Experts, free of charge. The website was designed to help accelerate medical advancements within the medical research community, completely free of charge.
16. WebMD and Definitive Healthcare provide content and/or services that compete for placement within Google Search Results Pages ("SRPs") with the website [www.keyopinionleaders.com](http://www.keyopinionleaders.com) operated by Key Opinion Leaders LLC from Katy, Fort-Bend county, Texas.
17. Upon information and belief, WebMD generates "Online Advertisement" revenue in excess of USD 3,000,000,000 per year. This Online Advertisement revenue is largely derived from Ads targeting visitors looking for Medical Information and dependent on WebMD receiving organic traffic, or visitors referred by Google Search Results Pages ("SRPs") and other search engines.

18. Upon information and belief, Mr. Travis Kalanick served as the Chief Executive Officer of Uber (NYSE: UBER) during the time the company was accused of widespread practices of sexual harassment, hostile work environment, and more relevant to this class action, illegal spying and sabotage of competitors.
19. Upon information and belief, it is of public knowledge that during his tenure as Uber's CEO, between the years 2014 and 2016, Mr. Travis Kalanick personally ran the Uber's Competitive Intelligence, or "COIN" group. Within the COIN group, Mr. Travis Kalanick developed and managed a software platform, codenamed "HELL", that was considered "top secret" within the company. The platform "HELL" allowed Mr. Kalanick and a small group of direct reports to personally track in real-time the location of most of Lyft drivers on the cities where Lyft was competing against Uber on customers and drivers' acquisition.
20. Upon information and belief, it is of public knowledge that during meetings with the small group of people involved in the development and operation of the software platform "HELL", Mr. Kalanick often praised the team for the work they were doing and how well it fit into Uber's culture of "hustle" in order to win.
21. Upon information and belief, on or around June 2017, as a result of the illegal spying allegations, Mr. Travis Kalanick resigned from his position as Uber's Chief Executive Officer but stayed engaged with Uber in a professional capacity serving on Uber's Board of Directors until December 2019 when he resigned from this position due to pressure from investors. The day of the separation of Mr. Kalanick from Uber's board, the stock price of Uber closed at USD 29.76 compared to the USD 45.00 IPO price. Many Americans suffered financial losses as a result of Mr. Kalanick's actions.
22. Upon information and belief, while serving on Uber's Board of Directors, Mr. Travis Kalanick also served on the Board of Directors of at least three other companies: Kareo, Inc., City Storage Systems LLC and StyleSeat Inc.
23. Upon information and belief, WebMD, once a public company, was taken private by KKR & Co. Inc., an investment management company that trades on the New York Stock Exchange (NYSE: KKR). This transaction took place on July 2017, less than a month after Mr. Kalanick's resigned as Uber's CEO.
24. Upon information and belief, Mr. Travis Kalanick served as a Director at Kareo, Inc. Kareo Inc was a company in the Health-tech space that was acquired by WebMD on a private transaction after Mr. Travis Kalanick resigned from his position on Uber's Board of Directors.
25. Upon information and belief, after Kareo, Inc.'s acquisition by WebMD, Mr. Travis Kalanick became a key player in the finances, operations and decision-making at WebMD, but that material information was never disclosed by KKR & Co. to the public, nor filled with the Securities and Exchange Commission.
26. Upon Information and belief, Mr. Travis Kalanick served as a Director at City Storage Systems LLC. City Storage Systems LLC is a company that focuses on utilizing third-party vehicles and real estate assets like apartments, houses and parking lots to provide storage and supply chain and distribution logistics for

delivery of packages to businesses and residential areas. City Storage Systems LLC's operational/business shared-economy model and technology resembles that of Uber but instead of routing drivers to transport passengers, they route drivers to store and transport "objects".

27. Seeking to: i) steal trade secrets from Key Opinion Leaders; and ii) gather information Defendants needed to perform "cyber attacks" targeting Google's infrastructure but aimed to demote the prominence of the website [www.keyopinionleaders.com](http://www.keyopinionleaders.com) on Google Search Result pages, Defendants hired Foreign Intelligence Services to install and operate illegal listening devices and spyware in the residences, vehicles and personal items property of the Plaintiff and some of the members of the Class.
28. Seeking to: i) steal trade secrets from Key Opinion Leaders; and ii) gather information Defendants needed to perform "cyber attacks" targeting Google's infrastructure but aimed to demote the prominence of the website [www.keyopinionleaders.com](http://www.keyopinionleaders.com) on Google Search Result pages, Defendants hired Foreign Intelligence Services to install and operate illegal GPS/GNSS Receivers on vehicles owned by the Plaintiff and some of the members of the Class, to continuously track the location, direction and speed of travel of Plaintiff and some of the members of the Class.
29. Upon information and belief, using a Logistics' Software System ("LSS") with characteristics that resemble a combination of Uber's vehicle/pedestrian routing technologies and Uber's top-secret project codenamed "HELL", Defendants routed thousands of unregistered foreign agents (in violation of the Foreign Agent Registration Act) and thousands of vehicles transporting devices and software designed and configured to achieve five goals: i) Update the Logistics Software System with the location, direction and speed of travel of Plaintiff and some of the members of the Class every 30 seconds or less; ii) Plan for the interception of Plaintiff and members of the Class by an agent of Defendants at traffic intersections like traffic lights or stop signs; iii) On successful interceptions of Plaintiff or Class members by an agent of Defendants, when Plaintiff and/or members of the Class were completely stopped: "Clone" their cellphone and/or download data recorded, stored and transmitted by illegal surveillance devices installed by agents of Defendants on the vehicles and/or personal items of Plaintiff and members of the Class; iv) Maintain Plaintiff under constant around-the-clock visual and electronic surveillance; and v) Harass and intimidate Plaintiff to prevent Plaintiff from contacting federal authorities.
30. Upon information and belief, using their Logistics' Software System ("LSS"), Defendants coordinated groups of foreign agents participating in the scheme to act together and perform overt acts together as a group. These overt acts had, as ultimate goal, to make possible the interception of private conversations, electronic communications and network traffic of the Plaintiff and members of the Class at traffic intersections.
31. Upon observation, information and belief, Defendants continuously repeated this process thousands of times using the Logistics' Software System ("LSS"), the Illegal Surveillance Devices and Software, Radio Frequency (RF) interception hardware/software, and Foreign Intelligence Agents, during years 2023 and 2024 .

32. Upon information and belief, Defendants intercepted, decrypted and accessed electronic communications between: i) Plaintiff or members of the Class; and ii) Servers and Network devices operated by Meta (formerly known as Facebook), Google, Whatsapp, Instagram, Amazon and Akamai. These electronic communications contained segments of private conversations carried out in person by Plaintiff or members of the Class with third parties in their homes and places of business/employment.
33. Upon information and belief, Defendants and/or their agents purchased and/or leased real estate properties neighboring the residences of Plaintiff and members of the Class with the purpose of installing electronic equipment to conduct visual and electronic surveillance on Plaintiff and members of the Class.
34. Upon information and belief, Defendants and/or their agents acquired or leased real estate properties neighboring the residences of Plaintiff and members of the Class with the purpose of installing electronic and network equipment to intercept, decrypt and gain unauthorized access to electronic communications, computer/network traffic and trade secrets belonging to Plaintiff and members of the Class.
35. Upon information and belief, Defendants co-conspired with International Aviation LLC, Mr. Donald W. Delahanty Jr. and other unnamed airmen licensed by the Federal Aviation Administration (the “FAA”), to operate multiple aircraft with the purpose of conducting illegal surveillance on vehicles driven by Plaintiff and members of the Class.
36. Upon information and belief, Defendants co-conspired with International Aviation LLC, Mr. Donald W. Delahanty Jr. and other unnamed airmen licensed by the Federal Aviation Administration (the “FAA”), to operate multiple aircraft at less than 250 feet ground distance from the residences of Plaintiff and members of the Class, with the purpose of intercepting and decrypting the up-link network traffic transmitted by network devices operated by Plaintiff and Class members to Starlink low-orbit satellites and Cellular Networks’ operators like AT&T, T-Mobile, Comcast, Fido, Telus, Google-Fi among others.
37. Upon information and belief, Defendants co-conspired with International Aviation LLC, Mr. Donald W. Delahanty Jr. and other unnamed airmen licensed by the Federal Aviation Administration (the “FAA”), to operate multiple aircraft, in occasions simultaneously, at less than 500 feet ground distance from Plaintiff, with the purpose of intimidating Plaintiff to preclude Plaintiff from contacting federal authorities to seek protection on his own behalf and on behalf of members of the Class.
38. Upon information and belief, Defendants and/or their agents offered bribes and favors to friends, employees, contractors of the Plaintiff or members of the Class in exchange for information about the whereabouts, access to IP addresses information, personal/business/operational plans, schedules and financial transactions of Plaintiff or members of the Class.
39. Upon information and belief, Defendants and/or their agents offered bribes and favors to friends, employees, contractors of the Plaintiff or members of the Class in exchange for physical access to the places of residence

and business of Plaintiff and members of the Class in order to install illegal surveillance devices in said premises.

40. Upon information and belief, Defendants and/or their agents offered bribes and favors to employees and officers of third-party companies that did business with Plaintiff and members of the Class, in exchange for information about the whereabouts, access to IP addresses information, personal/business/operational plans, schedules and financial transactions of Plaintiff or members of the Class.
41. Upon information and belief, Defendants and/or their agents unlawfully gained access to Medical, Insurance and Prescription records of Plaintiff and some of the members of the Class, in violation of the Health Insurance Portability and Accountability Act (HIPAA).
42. Upon information and belief, Defendants and/or their agents unlawfully gained access to banking statements, banking transactions, mortgage applications, credit applications, securities transactions and records of Plaintiff and some of the members of the Class, in violation of the Gramm-Leach-Bliley Act's (the "GLBA").
43. Defendants and/or agents of the Defendants threatened the Plaintiff with the use of physical violence, force and death, to intimidate Plaintiff and prevent Plaintiff from contacting federal authorities and/or seeking protection on his own behalf and on behalf of members of the Class.
44. Defendants and/or agents of the Defendants committed dozens of covert acts that can only be categorized as tortious interference and harassment against Plaintiff and members of the Class.
45. Upon information and belief, Defendants illegally intercepted and decrypted electronic communications between Plaintiff or members of the Class and the following Texas authorities or agencies: i) The Texas Office of the Attorney General; ii) The Fort-Bend Police Department; iii) The Fulshear Police department, iv) The Texas Department of Insurance, among others.
46. Upon information and belief, Defendants illegally intercepted and decrypted electronic communications between Plaintiff or members of the Class and the following federal agencies: i) The Securities and Exchange Commission (the "SEC"); ii) The Internal Revenue Service (the "IRS"); iii) The Federal Communications Commission (the "FCC"); iv) The U.S. Food and Drug Administration (the "FDA"); v) The Centers for Disease Control and Prevention (the "CDC"), among others.
47. Key Opinion Leaders LLC a vast compilation of documents containing of our observations of the technologies the Defendants use to intercept the Internet traffic of their targets. Our journal entries are available at <https://www.keyopinionleaders.com/> and the full archive can be downloaded from <https://storage.googleapis.com/omidyar-kalanick-evil-app/keyopinionleaders-notable-posts-archive.zip>



48. Key Opinion Leaders LLC published a small sample of the video recordings property of Key Opinion Leaders LLC where some of the alleged criminal acts can be observed. These videos are publicly accessible on this web address: <https://www.KeyOpinionLeaders.com/TRAVIS-videos> .
49. On September 2024, Plaintiff and the Class filed a similar petition with the Office of the Attorney General of Texas.
50. As of January 23<sup>rd</sup> 2025, Plaintiff and the Class have not received acknowledgement or response from the Office of the Attorney General of Texas.

**PRAYER FOR RELIEF**

Plaintiff, on behalf of himself and the Class, prays for relief as follows:

- A. For the appointment of a public prosecutor or a state-appointed attorney to represent the Class in litigation;
- B. For a Temporary Restraining Order enjoining the Defendants and their agents from physically approaching, by air or ground, the Plaintiff and members of the Class, their places of residence, business and employment;
- C. For an order declaring that Defendants’ acts and practices constitute violations of the ECPA;
- D. For an order declaring that Defendants’ acts and practices constitute violations of the TDPSA;
- E. For an order declaring that Defendants’ acts and practices constitute violations of the SCA;
- F. For an order declaring that Defendants’ acts and practices constitute violations of the CFAA;
- G. For an order declaring that Defendants’ acts and practices constitute violations of the EEA;
- H. For an order declaring that Defendants’ acts and practices constitute violations of the FARA;
- I. For an order declaring that Defendants’ acts and practices constitute violations of the HIPAA;
- J. For an order declaring that Defendants’ acts and practices constitute violations of the GLBA;
- K. For a permanent injunction enjoining Defendant from continuing to harm Plaintiff and members of the Public, the Class, and violating Texas and federal law in the manners described above;
- L. For restitution;
- M. For actual and statutory damages pursuant to ECPA;
- N. For actual and statutory damages pursuant to EEA;
- O. For nominal, compensatory, and punitive damages where appropriate;
- P. For reasonable attorneys’ fees and the costs of the suit, if any; and
- Q. For all such other relief as the Office of the Attorney General may deem just and proper and may be available at law or equity.

Dated: February 14, 2025

By: /s/ Reinaldo Aguiar  
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