IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

MARK P. ARZUMANIAN

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

THE KINGDOM OF SAUJI ARABIA

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____ (to be filled in by the Clerk's Office)

Jury Trial: X Yes □ No (check one)

FILED BY MEE D.C

AUG 0 9 2018

STEVEN M. LARIMORE CLERK U.S. DIST. CT. S.D. OF FLA. - W.P.B.

I. The Parties to This Complaint

A. The Plaintiff(s)

| Provide the information below for each plaintiff named in the complaint. A | Attach |
|--|--------|
| additional pages if needed. | |

Name
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address

MARK I. AR7 LMAN

R. D. Box 300 64

Palm Beach Gor Jens

561 703 8680

Mar Kpuzant Camail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

| Defendant No. 1 | Min a sale of Parai a a a air |
|----------------------------|---|
| Name | KINGDOM OF SAUDI ARABIA |
| Job or Title (if known) | through the Saudi Embassador H.R.A. Prince Khalid Bin Salman Bin |
| Street Address | Ab dyla Ziz |
| City and County | GOI Man Hampshire Ave. NW |
| State and Zip Code | Washington DC 20037 |
| Telephone Number | 2023423800 |
| E-mail Address | |
| (if known) | |
| Defendant No. 2 | |
| Name | |
| Job or Title | |
| (if known) | |
| Street Address | |
| City and County | |
| | |

| What | t is the b | oasis for | federal court jurisdiction? (check all that apply) |
|--------|------------|----------------|---|
| | K Fe | deral qu | estion Diversity of citizenship |
| Fill c | out the p | oaragrap | hs in this section that apply to this case. |
| A. | If th | e Basis : | for Jurisdiction Is a Federal Question |
| | List 1 | the spec | ific federal statutes, federal treaties, and/or provisions of the United |
| | State | s Const | itution that are at issue in this case. |
| | | 28 1 | 1.S.C. 1332 28 48c 1605(2) 48C 1608(3) |
| | | 28 | 48C 1608(3) |
| | | - | |
| | | | |
| В. | If th | e Basis | for Jurisdiction Is Diversity of Citizenship |
| | 1. | The l | Plaintiff(s) |
| | | a. | If the plaintiff is an individual |
| | | | The plaintiff, (name) Mark l. Ar Zu Man is a citizen of the State of (name) |
| | | | the State of (name) |
| | | ъ. | If the plaintiff is a corporation |
| | | | The plaintiff, (name), is incorporated |
| - | | | under the laws of the State of (name) |
| | | | and has its principal place of business in the State of (name) |
| | | (If m | nore than one plaintiff is named in the complaint, attach an additional |
| | | page | providing the same information for each additional plaintiff.) |
| | 2. | The | Defendant(s) |
| | | a. | If the defendant is an individual |
| | | | The defendant, (name) Twin co. Way Jons a citizen of |
| | | | the State of (name) Govern Ment of Or is a citizen of (foreign nation) |
| | | | John Janes Harris |

| b. | If the defendant is a comporation |
|-------|---|
| | The defendant, (name) Wern Mew of Mudi Arabia |
| | incorporated under the laws of the State of (name) |
| | , and has its principal place of |
| | business in the State of (name) Washington / C. Or is |
| | incorporated under the laws of (foreign nation) |
| | and has its principal place of . () |
| | business in (name) Embassy of Soundi Arabia |
| (If m | ore than one defendant is named in the complaint, attach an |
| addit | ional page providing the same information for each additional |
| | dant.) |
| иејеп | шин.) |
| The A | Amount in Controversy |
| The a | mount in controversy—the amount the plaintiff claims the defendant |
| OWES | or the amount at stake—is more than \$75,000, not counting interest |
| | osts of court, because (explain): |
| and c | osis of court, because (esperant). |
| | \$ 17.046.800 My additional |
| C. | mount for hunitive damages to be |
| | Lata Maillean of trick |
| | ternitives at the |

III. Statement of Claim

3.

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Atatement of Claim is or damages by a member of the Saudi Royal Jamily who stoled all the assets belonging to Plaintiff and liquidated all the assets of the Corporation Rainbow Tumpers, me.) and fled the USA to sale heaven taudi Arabia after com mi Hing avil thefts and related crimes and felonies

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

the fall offs are: 1- State Court judgment for 2. 1 Million Cree to loit of 8. violations of Employment contract

Printing danger for will theft and violation

28 U.S. C chapter 1605(2), 28 USC 1605 (3)

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 29, 20 8.

Signature of Plaintiff

Printed Name of Plaintiff

MARK PAR ZU MARK

B. For Attorneys

Date of signing: ______, 20__.

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

| MARKP.ARZOUMAN A/K/A | |
|-----------------------------|----------------------------|
| MARK P.ARZOUMANIAN | Complaint for a civil case |
| AGAINST | Case No.: |
| THE KINGDOM OF SAUDI ARABIA | Jury Trial |
| / | |

GENERAL ALLEGATIONS

- 1. At all times material hereto Plaintiff Mark P.Arzuman herein after "Mark" was a resident of Palm Beach County ,Florida over the age of 18 and otherwise sui juris.
- 2. Venue within the Palm Beach County, Florida as all the related disputes are located in Palm Beach County, Florida and all causes of action alleged had their genesis in Palm Beach County, Florida.
- 3. Any conditions precedent to the filing of this action and in obtaining the relief sought have been performed, occurred, and or otherwise been waived or excused.
- 4. Commencing in approximately 1982, Plaintiff Mark was employed by ,as well as an associate and partner of, Prince Bander Bin Saud Bin Abdulrahman Al Saud a/k/a/ Bader S,Saad ,a/k/a etc."Bin".
- 5. Mark and Bin were engaged together in a number of business ventures in Florida and other states of the USA, in Germany and Saudi Arabia. The ventures involved: the purchase and development of real property, purchase and retail businesses, equine activities, including the acquisition', training, showing, breeding and selling of professional jumping horses, the acquisition, and marketing of a commercial marina in the city of Obhor, Jeddah Saudi Arabia and other and further business activities like lending money and funds for mortgages in Saudi Arabia and the USA

This is mainly an action against the kingdom of Saudi Arabia because all the individuals involved in this action are members of the Saudi Royal family and

The individuals involved in this action are as follows:

- a. Prince Saud Bin Saad Bin Abdulrahman Al Saud now deceased and who is the father of the deceased prince BIN .The father was alive went BIN trespassed.
- b. Prince Bander Bin Saud Bin Saad Bin Abdulrahman Al Saud now deceased and who perished in the swiss air flight #111 over Nova Scotia in Canada on his way to Geneva, Switzerland.
- c. Prince Nawwaf Bin Saud Bin Saad Bin Abdulrahman Al Saud the younger brother of the deceased prince who inherited everything after the death of BIN according to Sharia law .Nawwaf was appointed universal heir by his father.
- d. Shamsah Saud mother of the deceased prince and also mother of prince NAWWAF the heir.
- e. All the above mentioned individuals were travelling by Diplomatic passports delivered by the Kingdom of Saudi Arabia.

f. The photocopies of these passports belonging to the above mentioned people are enclosed in the Appendix attached to the complaint. The causes of action are: 31: 3535 Action to recovery money

28:1346 Breach of contracts and agreements

28:1345co Replevin and conversion

28:1332 Diversity-Racketeering (RICO) act

28:1331tt Fed. Question: tort action

28: 1332ct Diversity (Citizenship)

The analogy in this case is quite simple comparing to the bombing of the battleship COLE in Yemen by individuals who were of Sudanese nationality. The federal court held the Sudanese government responsible for the death of seventeen US sailors see case Rux v. Republic of Sudan,672 F.Supp.2d 726 (E.D.Va.2009). The court awarded 316 million dollars to the victims and families.

In this action all the players and defendants are Saudi citizens and members of the royal Saudi family therefore the Saudi kingdom or the Saudi government is fully responsible for the actions of these members as far felonies and other crimes committed by these members of Saudi royalty.

The harm caused is criminal because the deceased prince BIN was a lawful US resident and the actions undertaken by the Heir Nawwaf was to avoid to pay taxes on sales of the assets, of the horses and all the profits made by the sale of horses and interest earned on the mortgages etc. that amount to hundreds of thousands of dollars, in addition of deposits of 3 million plus dollars with CITIBANK in Geneva. This account was earning nine thousand dollars a month

which the beneficiary Prince Nawwaf never paid any interest to the IRS. This is tax evasion and a felony.

The similarity of this instant case with Rux v. Republic of Sudan is technically the same as far as the players are concerned. IN RUX the criminals are of Sudanese nationality and the victims were US citizens whereas in this instant case the criminals are all of Saudi nationality and members of the Saudi royal family whereas the victim is Mark Arzuman the plaintiff who is US citizen

In RUX the federal court found that the Sudanese government is fully responsible of the criminal actions of its citizens who were involved in the bombing of the battleship COLE.

In this instant case the court should also determine that the Saudi government is fully responsible of the actions undertaken by its citizens i.e. members of the royal Saudi government as previously mentioned and as such this court should determine that the Saudi government is fully responsible of the felonious acts committed in the states against plaintiff Mark Arzuman who is a US citizen.

Consequently, Plaintiff mark arzuman should be compensated for all the damages incurred and inflicted on the Plaintiff Mark by the members of the Saudi royal family.

MONETARY CLAIMS

- 1. Court judgment for 2.1 million dollars see copy of same as certified by the trial court as exhibit......
- 2. Losses incurred by violations of written contract and agreements by Prince Nawwaf the heir amounting to Dollars 3.2 million
- 3. Real estate assets sold by Nawwaf Heir amounting to 2.5 million Dollars
- 4. Loss of plaintiff's personal property stolen by Nawwaf and his thugs 297.000.00 Dollars
- 5. Loan to Mogbel A. Al Suraihi amounting to Dollars 500.000.00
- 6. Cost of litigation amounting to Dollars 375.000.00 (estimate)
- 7. Total claim amounting to \$8.972.000.... Plus accrued interest at the rate of 4.75% per annum calculated flat for the past 18 years amounting to Dollars 8.074.800.- for a grand total claim of Dollars...17,046,800.00 Seventeen million forty six thousand and eight hundred Dollars
- 8. Punitive damages will be during trial as it was approved by the trial court

See certified copy of the order granting plaintiff's motion for punitive damages dated June 18,2013 as Exhibit

CASE LAWS referred by plaintiff in support of the claims are as following:

Plaintiff is referring to the following case laws as the basis for jurisprudence in this action for monetary claims (doctrine of STARE DECISIS).

- a. Republic of Iraq v. Beaty,556 US 848,129 S.CT 2183 (2009)
- b. Rux v. Republic of Sudan, 672 F, Supp.2d 726 (E.D.Va.2009)
- c. Daliberti v. Republic of Iraq,146 F Supp.2d 19

Further all the actions undertaken by Nawwaf in this case are felonious and these actions were directed and were targeting Mark the plaintiff pro se in this instant case since Nawwaf has a personal grudge against Mark because BIN humiliated him (Nawwaf) all the time in the presence of Mark by calling Nawwaf shorty, shrimp and lover boy and other names etc.

Moreover, Plaintiff Mark has in his possession all the documentation to show the court as EVIDENCE whenever requested, that is preponderance and conclusive evidence that Nawaf tampered with official documents in order to obtain licenses and permits contrary to BIN who was a legal resident alien as demonstrated in exhibits and that BIN had a green card a social security number and never paid taxes etc.

Plaintiff Mark is suing under 28 U.S.C. Chapter 1605(2) based upon commercial activities carried on in the United States by BIN like the sale of horses and frozen semen, retail businesses like seven eleven, purchase of horses in Germany and sold in the states, like the commercial marina in OBHOR, Jeddah for repairs of yachts purchased commodities in the states and sold in Saudi Arabia and the direct effect was laundering money.

In addition, the property in Delray Beach Florida inherited by Nawaf and sold by Nawaf under a trust bearing his mother's name Shamsah Al Saud, the monies deposited in Citibank Geneva, Switzerland which had a devastating effect on Plaintiff's finances when Nawaf stole the funds and used these funds for his own benefits as well as the funds deposited in Deutsche Bank Germany, these accounts were never his property but were owned by Plaintiff Mark and BIN.

Tort action by Nawaf who appropriated illegally all the horses in Germany and USA sold them without the knowledge of Plaintiff who was executive vice president of the corporation.

Nawaf inherited funds and properties in the state of Florida without exercising or performing a discretionary function by malicious prosecution, misrepresentation deceit in interference with the contract rights between BIN and Plaintiff Mark.

All the above mentioned claims fall under 28 U.S.C. chapter 1605(2)

Moreover, the stolen property belonging to Plaintiff is done in such way that violates international law see 28 U.S.C. 1605(3)

In addition to above Nawaf misappropriated all the proceeds of the mortgage by MOGBEL A.AL SURAIHI, SECOND SECRETARY OF THE SAUDI ARABIAN EMBASSY IN FRANCE AT that time; the value of the mortgage was 500.000.00 Five Hundred Thousand Dollars. This is in violation of international law. The mortgage of his buildings was in Jeddah Saudi Arabia, and Nawwaf Misappropriated in total

disrespect of the international laws since these funds belonged to Plaintiff who still holds the note and the mortgage. This action had a devastating effect on Plaintiff's finances.

Finally, contractual agreement made by BIN and Plaintiff were not respected by Nawaf who was supposed to pay 100.000.00 One Hundred Thousand dollars to Plaintiff every year after the death of BIN in violation of our agreement.

Wherefore in light of the foregoing Plaintiff Mark P.Arzuman Pro Se requests this honorable Court to enter a judgment ordering Defendant to pay all the above claims in addition to punitive damages that will be assessed during the trial.

CERTIFICATE OF SEIRVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been remitted to the clerk of the UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT FLORIDA on 2018

P.O.BOX 30064 Palm Beach Gardens, Florida 33420

IN THE UNITED STATES DISTRICT COURT. SOUTHERN DISTRICT OF FLORIDA

| COME | PLAI | NT | FOR | A CI | VIL | CASE |
|------|------|----|------------|------|-----|------|
| | | | | | | |

CASE NO.:

JURY TRIAL

APPENDIX

| DOCUMEN | ITS | AND | EXHIBITS | į |
|---------|-----|-----|----------|---|
| | | | | |

COMPOSITE EXHIBIT CONTENTS

All the Defendants in this instant case are Saudi citizens and holder of Saudi Diplomatic Passport as following:

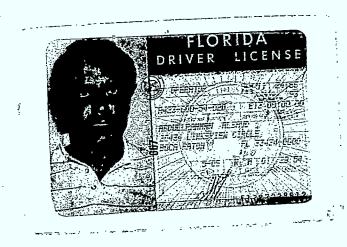
- H.H. Prince Bander Bin Saud Bin Saad Bin Abdullrahman Al Saud a/k/a His Royal Highness Prince B.S.S. Bin Abdulrahman Al Saud. Saudi Diplomatic Passport No.: 134-A.
- 2. Two Florida Driver Licenses: One in the name of Abdullrahman Al Saud Second in the name of: Bader S. Saad.
- 3. A Social Security card in the name of: Bader Saud Saad number 590-19-9019.
- 4. A Diplomatic Passport in the name of: H.H. Prince Nawwaf Bin Saud Bin Saad Bin Abdullrahman Al Saud, Diplomatic Passport number 174-A. United States Visa under Bin Nawwaf Saud Control number Florida Driver License in the name of Nawaf Saud 19962113000080. AlSaud under number A423-637-56-002-0. Saudi Arabian Driver License in the name of His Highness Prince Nawaf Bin Saud Bin Saud Bin Saad Al Saud under number 5/462033.
- 5. A Diplomatic Passport in the name of: Shamsah Al Saud, mother of H.H. Prince Nawaf Bin Saud Bin Saud A. Al Saud under the number 61-A.
- 6. A Diplomatic Passport in the name of: Mr. Mogbel A. Al Suralhi, Second Sec. At. Saudi Arabian Emb. In France under the number 47-1.

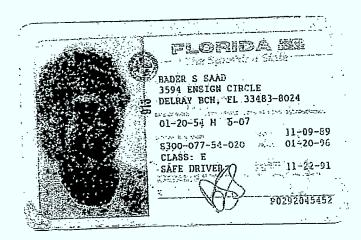
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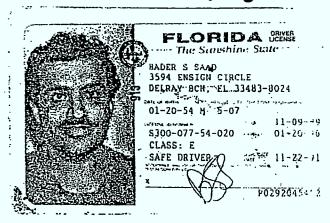
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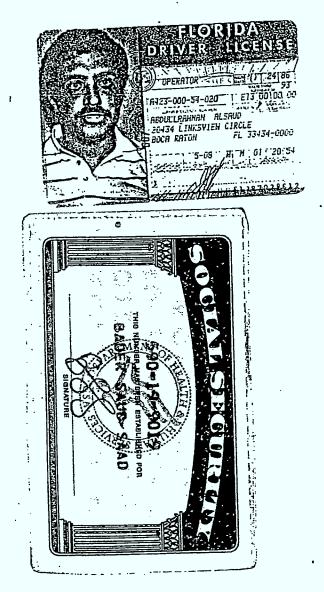


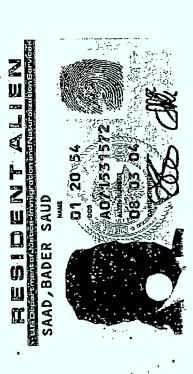


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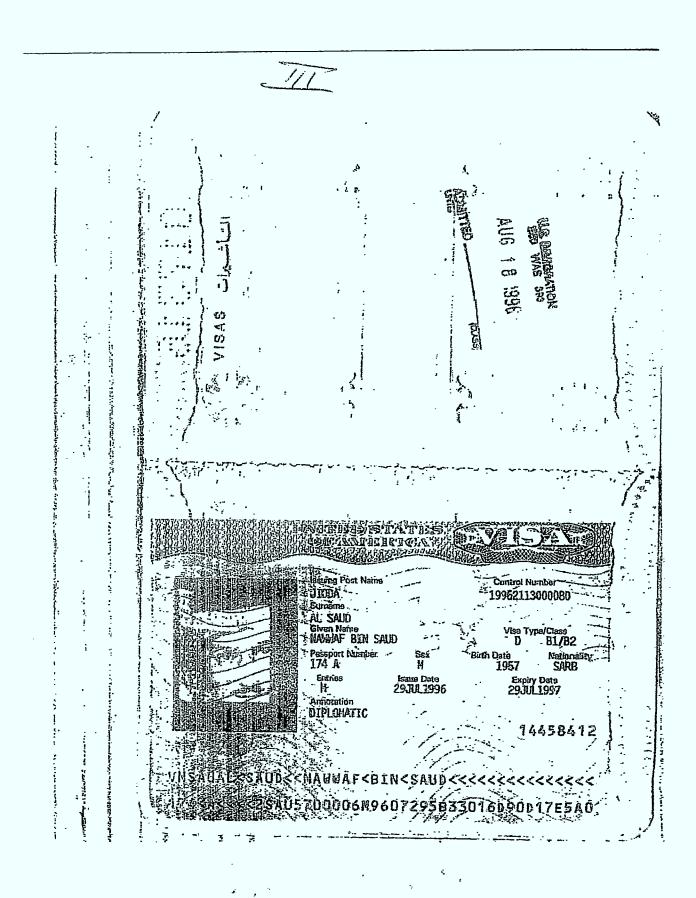


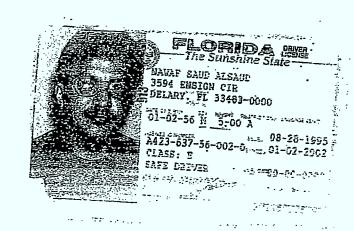


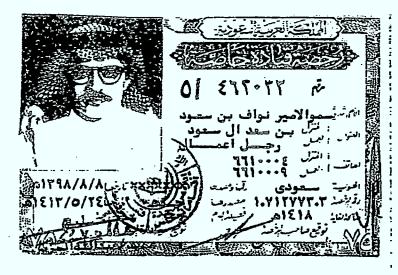
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PERSONS ACCOMPANYING BEARER OF PASSPORT

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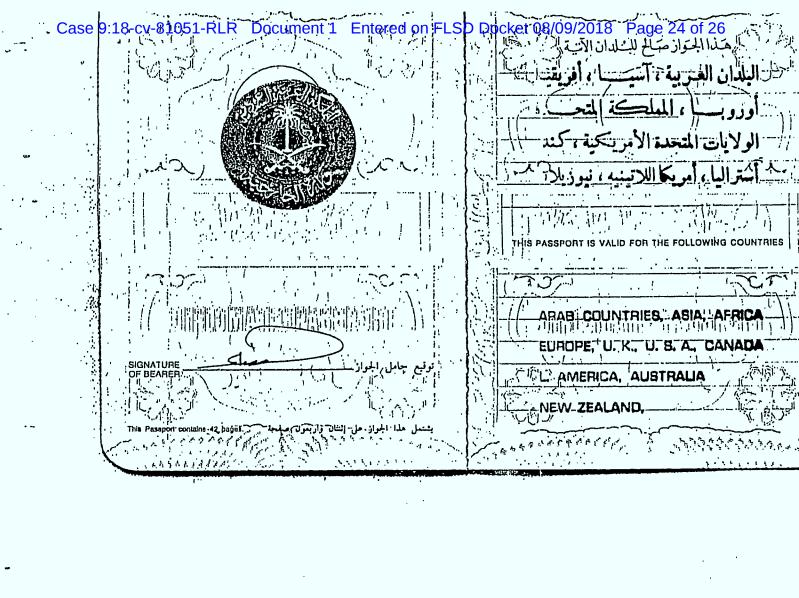


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THE SERIAL NUMBER OF HIS DRIVER'S LICENCE IS ; 5 / 462033

| Case 9:18/cv-81 | .051-RLR Document 1 Entered or السماء مرافيقي حاميل الجنواز المجاوز ا | FLSD Docket 08/09/2018 Page 23 of 26 RINGDOM OF SAUDIARABIA DIPLOMATIC PASSPORT |
|-----------------|---|---|
| | | |
| | . 1 | ASSPORT NO 4 7-1 1/2 Y |
| | | NAME OF BEARER MR. MOGBEL A. A. SURALHI. SECOND SEC. |
| | | DATE OF BIRTH = 1255 |



Kingdom of Saudi Arabia

Office of

H.B.D. Prince Bandar Bin Saoud Bin Saad Bin Abdulrahman Al Saoud



المملكة (العربية م السعودية) مائة والأنيه بنروب عثر وين كثيرا (عزرال بعود

December 10, 1983



To Whom it May Concern:

This is to advise that Mark Puzant Arzoumanian represents us for our private and public business in the United States of America.

Consequently, we delivered him this affidavit expecting you provide him all necessary help and assistance whenever needed.

Thanking you for your cooperation and appreciation.



H.R.H Price BSS AbdullRahman Al Saud

SWORN TO and subscribed before me this 3rd day of August, 1988

Joanne M. Bennett-Notary Public State of Florida at Large

my commission expires:

RETARY PUBLIC THATE OF FLORIDA SY DOWNISSION EXP. DOT 24,1988 SOURCE THRE SCREAL INS. SHD. Exhibit#7

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT OF FLORIDA, IN AND FOR PALM BEACH COUNTY CASE NO. 502099CA004139XXXXMB AI

MARK P. ARZUMAN a/k/a MARK P. ARZOUMANIAN, et al, Plaintiff(s),

vs
THE ESTATE OF PRINCE BANDER BIN
SAUD BIN SAAD BIN ABDULRAHMAN
AL-SAUD, ETC.,
Defendant(s).

2014 DEG -8 AM 9: 45
SHAROK K. BOCK, CLERK
PALM BEACH COUNTY, FI

FINAL JUDGMENT

THIS CAUSE came before the court for non-jury trial on November 25, 2014. Plaintiff was present and Defendant failed to appear. The Court took testimony from Plaintiff, Mark P. Arzuman, and received documentary evidence. After having reviewed the complete Court file and the Court being otherwise fully advised in the premises, it is

ORDERED AND ADJUDGED as follows:

Final Judgment is entered in favor of Plaintiff, Mark P. Arzuman, and against Defendant, The Estate of Prince Bander Bin Saud Bin Saud Bin Abdulrahman Al-Saud, in the amount of two million one hundred thousand dollars and no cents (\$2,100,000.00).

The Court retains jurisdiction to award costs and/or attorney's fees, if any, upon filing of an appropriate and timely motion and to enter any and all orders that may be necessary to enforce this Judgment.

DONE AND ORDERED at West Palm Beach, Palm Beach County, Florida, oret day of December, 2014.

MEENU T. SASSER, CIRCUIT JUDGE

CC.

Mark P. Arzoumanian, 11621 US Highway One, North Palm Beach, FL 33408 Nawwaf Al Saud, P.O. Box 9148, Jeddah, Saudi Arabia 21413

Exhibit #8

CFN 20140457208, OR BK 27212 PG 1940,RECORDED 12/11/2014 14:37