

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

MATTHEW SCHRIER,)
) **Case No.:**
 Plaintiff,)
)
 v.)
)
 QATAR ISLAMIC BANK,)
)
 Defendant.)
 _____)

COMPLAINT

Plaintiff Matthew Schrier alleges the following in support of his claims:

NATURE OF THE ACTION

1. While reporting on the Syrian Civil War, Matthew Schrier was kidnapped and imprisoned for 211 days by the Nusra Front, the Syrian Al-Qaeda affiliate. The Front subjected Mr. Schrier to horrific conditions and extreme psychological and physical abuse. He was beaten and tortured on at least ten occasions, often by teams of terrorists, threatened multiple times with summary execution, and forced to observe and hear the torture of other prisoners. He was deprived of water and food, held in rooms that were freezing cold or boiling hot, without light or ventilation, and denied access to bathrooms for days at a time. He contracted food poisoning and an internal infection, both untreated, and was infested by bed bugs. He often thought he was going to die in captivity, or wished for death, and described reaching “a place beyond depression.”

2. The Nusra Front handed Mr. Schrier over to its ally, Ahrar al-Sham, for 46 of the 211 days of imprisonment. The conditions were no better. Ahrar al-Sham interrogated Mr. Schrier on several occasions. They deprived him of water, crammed him into a too-small, poorly ventilated cell with other prisoners, and beat other prisoners in front of him. One night, he heard

shells exploding nearby and wondered whether he would die.

3. The Nusra Front and Ahrar al-Sham used an international network of donors and charities to fund this and other acts of terrorism, and they relied on defendant Qatar Islamic Bank (QIB) to provide financial services to those donors and financial support to the charities. This action seeks to hold QIB accountable for its role in financing and supporting the Nusra Front's and Ahrar al-Sham's terrorist activities.

4. QIB played two substantial roles in supporting the groups that held Mr. Schrier captive. First, it allowed Qatari national Saad bin Saad al-Kabi to open an account in the name of his minor son (the "al-Kabi QIB account") and to use that account to funnel money from donors in Qatar and elsewhere to the Nusra Front. Second, it donated a substantial sum to Qatar Charity, a known Al-Qaeda funder and well-publicized supporter of Ahrar al-Sham.

5. While Mr. Schrier was sitting in a cell, al-Kabi spearheaded a highly visible campaign using U.S.-based social media platforms such as Twitter, Facebook, YouTube, and WhatsApp, to solicit donations for a campaign called Madid (or Madad) Ahl al-Sham ("Madid campaign"). These donations were intended to fund, and ultimately did fund, the Nusra Front. The campaign advertised the al-Kabi QIB account as the place for donors outside Qatar to wire their donations to support the Nusra Front's terrorism.

6. The campaign collected enough money to fund hundreds of Nusra Front terrorists. Some of that money flowed through the al-Kabi QIB account and ultimately to the Nusra Front.

7. QIB knew what the al-Kabi account was for. At the time al-Kabi used the account to fundraise for the Nusra Front, QIB had customer due diligence policies designed to prevent its services from being used to finance terrorism. It also had periodic account monitoring policies to prevent accounts from being used to finance terrorism.