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Co-Counsel for Plaintiffs, Xiyue Wang and Hua Qu

XIYUE WANG and HUA QU,

Plaintiffs,

v.

PRINCETON UNIVERSITY and the
TRUSTEES OF PRINCETON UNIVERSITY,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MERCER COUNTY

Docket No.: MER-L-

Civil Action

COMPLAINT WITH JURY DEMAND

The Plaintiffs, Xiyue Wang and Hua Qu, by and through their attorneys, as and for their Complaint, allege and say:

1. This action is brought by the Plaintiffs against the Defendants, Princeton University and the Trustees of Princeton University (collectively, "Princeton"), for severe personal injuries and other irreparable harm, which the Plaintiffs have suffered as a result of the Defendants' reckless, willful, wanton, and grossly negligent acts.

2. Specifically, Princeton, by and through its employees, representatives, agents, or other persons acting on its behalf, directed the Plaintiff, Xiyue Wang, a U.S. citizen, graduate student and Ph.D. candidate, to travel to the Islamic Republic of Iran (hereinafter, “Iran”) to conduct research abroad on a foreign language visa, notwithstanding (a) Iran’s designation by the United States as a State Sponsor of Terrorism, (b) Iran’s longstanding open and notorious hostility toward the United States, (c) Iran’s known reputation for taking foreign westerners, particularly Americans, hostage on specious grounds, (d) Mr. Wang was not studying or specializing in the study of Iranian history or politics, and (e) Mr. Wang’s adviser lacked demonstrable expertise on the subjects of Iranian history and politics.

3. Though Mr. Wang raised numerous questions and concerns both before and during his visit to Iran, Princeton compounded its foolish and reckless decision to direct Mr. Wang to travel to and conduct research in Iran, through a series of subsequent actions, inactions and reckless decision-making, which subsequently resulted in Mr. Wang spending years of his life as a hostage in Iranian prisons to be interrogated, abused, tortured, and emotionally destroyed.

4. For example, Princeton directed Mr. Wang to be persistent in his efforts to conduct research in Iran’s Foreign Ministry Archives and Iranian National Archives (the “Archives”), notwithstanding Princeton’s knowledge that the visa Mr. Wang was able to obtain restricted him solely to foreign language studies.

5. As Mr. Wang’s activities attracted the malign interest of the Iranian authorities, Princeton was shockingly ambivalent towards the very real threat this posed to Mr. Wang and revealed that it had no plan whatsoever for protecting Mr. Wang, as it saw no need to do so.

6. The walls of Iran’s security apparatus closed in around Mr. Wang, and his laptop and passport were seized, but Princeton advised him not to seek sanctuary at the Swiss Embassy,

the only entity in Iran that could have possibly kept Mr. Wang safe, and assured Mr. Wang that he was unlikely to be detained. Princeton assured Mr. Wang and Ms. Qu that they should rely on Princeton's judgment and expertise that Mr. Wang would not be detained and responded to the alarms raised by Mr. Wang and Ms. Qu with indifference.

7. Only after Mr. Wang was inevitably arrested and imprisoned, Princeton finally sprang into action. However, it did so only to protect itself, its institutional reputation and its desperate and misplaced relationship with the terror-funding, hostage-taking, Western-hostile dictatorship of Iran – leaving Mr. Wang to rot in Iranian jail cells. Specifically, Princeton sought to fully control all efforts to secure Mr. Wang's release by keeping his story out of the press, dissuading his advocates, including his wife, Ms. Qu, from seeking help from experts, turning down help offered to Mr. Wang without his family's knowledge, keeping Ms. Qu away from the contacts Princeton consulted, and stifling any outside efforts to rescue Mr. Wang from what would turn out to be years of imprisonment and physical and emotional torture.

8. Upon Mr. Wang's release, Princeton exacerbated the trauma that Mr. Wang suffered by disclaiming any accountability for its actions, deflecting all blame for what Mr. Wang experienced to others including the U.S. government and even Mr. Wang himself. Princeton's victim-blaming, as well as its refusal to provide appropriate support and accommodations to Mr. Wang compounded Mr. Wang's suffering.

9. In short, at every step, Princeton recklessly, willfully, wantonly, and in a grossly negligent manner turned Mr. Wang into a target for and victim of the security apparatus of Iran – a known State Sponsor of Terrorism – taking direction primarily from the pro-regime activists and academics Princeton had hired and whose advice was diametrically opposed to the advice being provided by experts in hostage situations, which Princeton ignored. In prioritizing the school's

coveted reputation and relationship with the terrorist state of Iran over the safety of its student, Princeton's conduct gave rise to and perpetuated Mr. Wang's inevitable tragic fate.

JURISDICTION, VENUE, AND CHOICE OF LAW

10. This Court has jurisdiction over the Defendants because it has transacted business within the State of New Jersey at all times relevant to this Complaint.

11. Pursuant to R. 4:3-2(b), venue is proper in Mercer County based upon the Plaintiffs' residency and the Defendants' principal place of business.

THE PARTIES

A. The Plaintiffs

12. Plaintiff Xiyue Wang ("Mr. Wang") was and, at all times relevant hereto, is a citizen of the United States and resident of New Jersey. Mr. Wang was a Ph.D. student at Princeton, studying Eurasian history of the late nineteenth and early twentieth centuries. Mr. Wang had no academic background in Iranian history and politics. As described more particularly below, Mr. Wang was strenuously encouraged by his doctoral advisor as well as other administrative, academic, other employees and affiliates of Princeton to travel to the Islamic Republic of Iran to conduct research for his dissertation and improve his Persian language skills, despite Princeton's knowledge of the serious risks facing U.S. citizens in Iran and the lack of any safeguards in place or experience placing students there. Throughout Mr. Wang's time in Iran, he notified Princeton of many instances in which his personal safety and freedom were in danger, but each time he was encouraged to remain in Iran, stay quiet, and be patient with the instrumentalities of the regime.

13. On August 7, 2016, Mr. Wang was detained, his passport was taken. He was later arrested, taken hostage, and caused to be imprisoned on false charges by Iranian authorities. In a

bogus trial, he was convicted of Collaboration with a Hostile State as an infiltrator and a spy and sentenced to ten years of imprisonment. He spent forty months (1,216 days) in Iran's notoriously brutal Evin Prison and was in Iranian custody as a hostage, used by Iran to extort the United States for political gains just as it had done in the past. During his wrongful imprisonment, Mr. Wang was tortured and mistreated in numerous respects.

14. Plaintiff Hua Qu ("Ms. Qu") is and was, at all times relevant hereto, the wife of Xiyue Wang and a permanent resident of the United States living in the State of New Jersey. Ms. Qu has suffered severe mental anguish and extreme emotional pain and suffering, including the loss of society and services of her husband.

B. The Defendants

15. Defendant Princeton University is a private not-for-profit, nonsectarian institution of higher learning and research in Princeton, New Jersey. The Graduate School at Princeton administers the Ph.D. program in which Mr. Wang was a student. Princeton also hosts the Sharmin and Bijan Mossavar-Rahmani Center for Iran and Persian Gulf Studies (the "Princeton Iran Center") that sponsored Mr. Wang's travels to Iran jointly with Princeton's History Department. Princeton University can sue and be sued in this Court.

16. Defendant Trustees of Princeton University is a New Jersey non-profit corporation and is responsible for the overall direction of the university. The Trustees of Princeton University consist of no fewer than 23 and no more than 40 members at any one time. The Trustees of Princeton University approve the operating and capital budgets, supervise the investment of the university's endowment, and claim copyright ownership over all content posted on the websites of Princeton University including those of The Graduate School at Princeton and the Iran Studies Center. The Trustees of Princeton University exercise prior review and approval concerning

changes in major policies and the hiring of faculty members. According to Princeton University administrators, the Trustees of Princeton University were briefed on Mr. Wang's case on regular basis. The Trustees of Princeton University can sue and be sued in this Court.

FACTS

The Islamic Republic of Iran

17. Islamic Republic of Iran is a foreign state that is one of only three countries currently designated by the United States of America federal government as a State Sponsor of Terrorism pursuant to § 60 of the Export Administration Act of 1979 (50 U.S.C. App. § 2405) and § 620(A) of the Foreign Assistance Act of 1961 (22 U.S.C. § 2371). Iran has been designated a State Sponsor of Terrorism at all times since January 19, 1984, the longest in duration among designated countries that also had no diplomatic relations with the United States.

18. The current regime in Iran took control of the country in 1979, following the Islamic Revolution—a series of events that culminated in the overthrow of the Pahlavi dynasty under Shah Mohammad Reza Pahlavi and the replacement of this government with an Islamic republic under the rule of Ayatollah Ruhollah Khomeini, a leader of one of the factions in the revolt. Under the new regime, newspapers and several other democratic institutions were dissolved. In the years following the revolution, human rights groups estimated the number of casualties suffered by protesters and prisoners of the new system to be several thousands.

19. The United States severed diplomatic relations with Iran on April 7, 1980. This action was taken following the seizure by student militants of the American Embassy in Tehran and its staff on November 4, 1979, and the subsequent failure of the Iranian government to secure the release of the 52 American citizens and diplomats for 444 days. The hostages eventually were

released on January 20, 1981; however, diplomatic relations remain severed, and Switzerland currently serves as the protecting power for U.S. interests in Iran.

20. Iran has continued to utilize hostage-taking as a tool of international diplomacy. In the nine years prior to Mr. Wang’s detention, from 2007-2015, Iran arbitrarily arrested 27 reported foreigners, dual nationals, or Iranian citizens with permanent residence abroad. From 2016-2019, Iran arbitrarily arrested another 30 such individuals, including Mr. Wang.

21. The United States Department of State Travel Advisory for Iran advises that U.S. citizens “do not travel to Iran due to the risk of kidnapping and the arbitrary arrest and detention of U.S. citizens.” The advisory continues, “U.S. citizens visiting or residing in Iran have been kidnapped, arrested, and detained on spurious charges. Iranian authorities continue to unjustly detain and imprison U.S. citizens, particularly dual national Iranian Americans—including students, journalists, business travelers, and academics—on charges including espionage and posing a threat to national security. Iranian authorities routinely delay consular access to detained U.S. citizens and consistently deny consular access to dual U.S.-Iranian citizens. The U.S. government does not have diplomatic or consular relations with the Islamic Republic of Iran. The U.S. government is unable to provide emergency services to U.S. citizens in Iran.”¹

Attitudes at Princeton Regarding Iran and its Relations with the US

22. Despite Iran’s well-documented record of kidnapping, sponsorship of terrorism, and explicit hostility towards the United States and its closest allies around the world, among the academics at Princeton groupthink had coalesced around a belief that the U.S. had so badly mistreated Iran in the past that it must engage and appease the Islamic Republic now. Pro-engagement and pro-Iran scholars prevail at Princeton and Princeton as an institution sits proudly

¹ <https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/iran-travel-advisory.html>.

at the forefront of the pro-engagement crowd in the United States. In the classroom, published materials and media appearances, Princeton academics overly emphasize US imperialism, condescension, and other behavior toward the Middle East, especially Iran, as being responsible for Iranian's destructive behavior. Princeton has gone so far as to host and employ ex-Iranian ambassador to Germany Seyed Hossein Mousavian who has been identified as contributing figure towards the political murder of dissidents.

23. Seyed Hossein Mousavian is a Middle East Security and Nuclear Policy Specialist at the Program on Science and Global Security at Princeton University. He is a former diplomat who served as Iran's Ambassador to Germany (1990-1997), which coincided with the regime's assassination of four dissidents on German soil. The German government eventually requested the removal of Mousavian along with others attached to the intelligence section of the Iranian embassy. Mousavian has also served as Head of the Foreign Relations Committee of Iran's National Security Council (1997-2005), Spokesman for Iran in its nuclear negotiations with the international community (2003-2005), Foreign Policy Advisor to the Secretary of the Supreme National Security Council (2005-2007), Vice President of the Center for Strategic Research for International Affairs (2005-2009), General Director of Foreign Ministry for West Europe (1987-1990), Chief of Parliament Administration (1984-1986), and the editor-in-chief of the English-language international newspaper Tehran Times (1980-1990). Since joining Princeton in 2009, Mr. Mousavian has written many articles and made many media appearances where he has advocated in favor of the United States allowing Iran to obtain nuclear capabilities. Mr. Mousavian is understood to be a strong and avid supporter of the current Iranian terrorist regime. Mr. Mousavian frequently published pro-regime articles throughout Mr. Wang's imprisonment in Evin Prison.

24. The history between Princeton and Iran is over a century old. Howard C. Baskerville, Class of 1907, went to Iran as an English teacher and died fighting alongside his students in a short-lived quest for constitutional democracy.

25. In 1969, Princeton accepted a foundational grant from the Pahlavi Fund, which was established by the Shah to promote understanding of Iranian society and culture.

26. After the 1979 Revolution, the Islamic regime gained control over the Pahlavi fund, and subsequently rebranded the charity as the Alavi Foundation. Through the fund, the new regime continued to donate millions of dollars to schools across the United States to promote the hiring on pro-regime professors at the most prestigious American colleges and universities, including Princeton, which accepted the donations from the foundation despite the regime's hostile relation with the U.S. government.

27. In 2012, Princeton University established the Sharmin and Bijan Mossavar-Rahmani Center for Iran and Persian Gulf Studies. According to the Princeton Iran Center's website, the center was "launched to promote groundbreaking independent scholarship and teaching" and "to promote a new understanding of Iranian society and culture."

28. Over the years, the Princeton Iran Center has received funding from and employed as staff individuals who maintain allegiances with the current regime in control of Iran and who openly oppose the activities of the United States and its allies in the Middle East.

29. The funder of the Princeton Iran Center Bijan Mossavar-Rahmani moved to the United States from Iran in 1978 to attend Princeton. Today he is the Executive Chairman and CEO of RAK Petroleum PCL, a United Arab Emirates energy company that sells petroleum to the regime in Iran. Mr. Mossavar-Rahmani has a deep financial interest with the regime and avidly promotes engagement.

30. Mona Rahmani (“Ms. Rahmani”) was senior research specialist at the Princeton Iran Center during its inaugural years of operation, from 2014-2017. In that capacity, she managed programs, projects and events and supported research to promote engagement with the Iranian regime. Her father Mostafa Rahmani was the director of the Iranian Interest Section (2010-2015) at the Embassy of Pakistan in Washington DC. Ms. Rahmani is understood to be a strong and avid supporter of the Iranian regime and was hired at Princeton because of her father’s close affiliation with the Iranian regime. Mona Rahmani advised and facilitated Mr. Wang’s visa application.

31. Today, the Princeton Iran Center is led by its Director Behrooz Ghamari-Tabrizi, who has spoken out in support of the Iranian regime and its proxy terrorist groups, and against the United States and its allies in the Middle East.

32. Soon after Mr. Wang was interrogated by Iranian authorities the first time on July 20, 2016, several of the above Iranian regime sympathizers told Princeton that they did not want to be involved or in any way being mentioned in Mr. Wang’s case, other than encouraging Princeton to stay quiet about the matter and to direct the Wangs to stay quiet as well.

Princeton Directed Mr. Wang to Study in Iran

33. Mr. Wang was directed by Princeton to study in Iran primarily by his faculty adviser Professor Stephen Kotkin.

34. Princeton vests in its faculty advisers complete authority over the research activities of doctoral students they advise, as explicitly stated on Princeton’s Graduate School website: “While the range of topics that Ph.D. students may pursue for dissertation work is wide, it nonetheless may be limited by the interests and expertise of the faculty. Students may need to

adjust their research topics in order to align them with faculty expertise if they wish to complete the degree.”²

35. Generally speaking, advisee-students rely upon their faculty advisers for their academic and professional success and enhancement. Advisee-students’ progress year by year within the program requires their faculty advisers’ approval at their annual reviews. Advisee-students’ applications for internal and external fellowships require their advisors’ endorsements. Advisee-students’ depend on their advisors’ connections and recommendation letters to land academic jobs. Advisee-students’ need their faculty advisers’ endorsements when the advisee-students are up for tenure review and want to be promoted from assistant to associate professors. As a result of these policies, faculty advisers wield nearly absolute control over their advisees’ decision-making, which in turn makes it extremely difficult, if not impossible, for student-advisees to defy or even second-guess their faculty advisers’ advice and guidance.

36. Mr. Wang’s faculty adviser Kotkin is a particularly demanding faculty adviser who, upon information and belief, has effectively forced out at least two of his student-advisees in the last six years.

37. The manner Kotkin provided guidance, frequently compelled the Wangs into making decisions that were harmful to Mr. Wang. When advising Mr. Wang and Ms. Qu about engaging with Iranian authorities before, during and after their interest in Mr. Wang’s research, Kotkin presented drastically irreconcilable views about the regime. As such, the guidance he provided was wholly inconsistent at these various stages other than always being authoritative, self-serving, and lacking in accountability. Initially, after Mr. Wang arrived in Iran, Kotkin downplayed Mr. Wang’s concerns about being denied access to certain Archives, instructed Mr.

² See <https://gradschool.princeton.edu/academics/degree-requirements/phd-advising-and-requirements>.

Wang to firmly challenge any resistance he encountered from Iranian authorities, and discounted such obstacles as merely the by-product of bureaucracy. However, once it became clear that this approach had aroused suspicion, Kotkin refused to further communicate with Mr. Wang over email. Then, approximately one year into Mr. Wang's imprisonment, Ms. Qu was approached with an offer to be put in touch with the BBC Persian media outlet, which would allow her to go on air and make a plea directly to the Iranian people to advocate for Mr. Wang's release. She relayed this opportunity and her interest in pursuing it to the Princeton team, noting historical precedent that such engagement has contributed to positive results. In joining Princeton's efforts to keep Ms. Qu silent, Kotkin informed the team that he had been offered a similar opportunity and declined, based on his "strongly held" view that any public statement seeking Mr. Wang's release, even politely worded and appealing to the mercy of the Supreme Leader, could be dangerous and provoke the anger of the regime. Based on Kotkin's guidance, Ms. Hua declined this interview and the opportunity it presented to engage the Iranian public, while expressing concern that even a few more months in detention could seriously negatively impact Mr. Wang's condition. Mr. Wang would go on to spend over two additional years in prison following this exchange.

38. When Mr. Wang enrolled in Princeton, he never intended to travel to or study in Iran, nor did he study Iranian history or politics before or at Princeton. He came to Princeton specifically to work with Kotkin, who is an expert on Russia and Soviet Union and who similarly did not have any meaningful background or expertise with Iran. Initially, Mr. Wang was inclined to do a comparative governance project about Russia's Muslim territory and Russia's neighboring Muslim countries, that included (Ottoman) Turkey, Afghanistan, and China's Xinjiang. In fact,

Mr. Wang went to Turkey to sharpen his Ottoman Turkish in summer 2014 after his first-year coursework, as he contemplated a project that would focus on Ottoman Turkey.

39. Initially, Kotkin directed Mr. Wang to perform his research in Afghanistan. Although Mr. Wang did not intend on studying in Afghanistan or Iran per se, Kotkin suggested, multiple times over, that Mr. Wang study in Afghanistan due to his knowledge of the Persian language and his experience working and living in Afghanistan in the past.

40. On December 3, 2014, Michael Cook, a Princeton professor well-renowned for his knowledge of Middle Eastern history, along with the Princeton Iran Center inexplicably began recruiting students to study in Iran and prompted interested students to reach out to Dr. Kevan Harris, (“Dr. Harris”) who was the acting director of the Princeton Iran Center at the time.

41. About three weeks later, on December 30, 2014, Mr. Wang directly responded to Mr. Cook’s solicitation and reached out to Dr. Harris expressing his curiosity and interest in studying Persian language, noting that Kotkin had been encouraging Mr. Wang to study Afghanistan and Iran.

42. Dr. Harris encouraged Mr. Wang to apply to the Dekhoda Lexicon Institute and International Center for Persian Studies (“Dekhoda Institute”). Dr. Harris himself had previously studied in Iran and Mr. Wang therefore trusted Dr. Harris’ advice and direction. Upon information and belief, during his study in Iran, Dr. Harris was arrested and detained. Dr. Harris however never disclosed the fact that he was arrested in Iran to Mr. Wang, but instead inexplicably encouraged Mr. Wang to study in Iran.

43. Mr. Wang had initially applied in February 2015 for an Iranian student language visa for a summer Persian language program in 2015. Mr. Wang’s expectation in the beginning was that he would merely study the Persian language at the Dekhoda Institute in Iran during the

summer of 2015 before moving on to Afghanistan to perform his substantive research in early 2016, since language study alone on a visa for that very purpose is a much lower risk activity. As such, Mr. Wang applied for a student language visa through the Dekhoda Institute from the Iranian authorities.

44. After not hearing back on his application for many months, Mr. Wang made alternate plans to improve his Persian language skills. By the fall semester of 2015, Mr. Wang was in touch with the American Institute of Afghanistan Studies and the Afghan National Archive in Kabul, in preparation for a research trip to Afghanistan beginning in January 2016. According to his schedule, Mr. Wang submitted his dissertation prospectus on a project about Afghanistan which was approved by Kotkin in mid-November 2015.

45. However, on November 18, 2015, Mr. Wang received an email from the Dekhoda Institute, notifying him that his student language visa to study at the Dekhoda Institute in Iran was approved. He shared this information that day in a routine advisor-advisee meeting with Kotkin who immediately directed Mr. Wang to go to Iran in lieu of his original planned trip to Afghanistan, despite his lack of experience or expertise on the country. While the United States government had long severed relations with Iran and warns U.S. citizens not to travel to Iran, as the U.S. is not able to protect them, the academic consensus at Princeton was that the concerns of the U.S. government were significantly overstated.

46. Kotkin advised Mr. Wang that an opportunity to study in Iran was rare and that he should take advantage of the opportunity to explore research possibilities in Iran, even though this was beyond the scope of what Mr. Wang's student language visa would permit. Kotkin further advised that if it proved impossible to conduct research in Iran, Mr. Wang could always go to Afghanistan later. Kotkin directed Mr. Wang to consult Princeton Iran Center for further advice.

47. On November 20, 2015, Mr. Wang emailed Ms. Rahmani, a Senior Research Specialist at the Princeton Iran Center, who was referred to Mr. Wang by Dr. Harris. Mr. Wang sought Ms. Rahmani's advice on whether the Iranian authorities would allow him – as a U.S. passport holder on a student language visa – to access the Iranian National Archives. Mr. Wang explained to Ms. Rahmani that making the trip to Iran only for gaining spoken proficiency in Farsi made little sense at that stage of his doctoral studies and that he would only seriously consider going if it would be possible for him to see the Archives.

48. Ms. Rahmani responded hours later via e-mail assuring Mr. Wang that he would be able to see the Archives and stating that she “would highly recommend going,” to Iran. Ms. Rahmani further explained that the Princeton Iran Center had contacts at the Archives, and that it would be easy for Mr. Wang to obtain a temporary pass as a visiting researcher once he was already inside Iran on his foreign language study visa.

49. Princeton's stature as one of the most elite institutions of higher learning in the United States, its long tradition of Iranian studies, coupled with the fact that some of the best-known Iran experts in the United States teach at Princeton convinced Mr. Wang that when Princeton urged, advised and directed him to go to Iran to do research, it had conducted the necessary due diligence and had the necessary safeguards in place to ensure his safety. Mr. Wang expected that in sending him to Iran, Princeton considered his well-being to be a priority.

50. Mr. Wang was well-aware that a failure to align his research topic with Kotkin's direction could result in his removal from the doctoral program at Princeton (as has been the case for a student in his cohort who was advised and subsequently forced out by Kotkin). Moreover, when Kotkin told Mr. Wang to put his trip to Afghanistan on hold and instead to take the trip to Iran, Mr. Wang relied on the advice and guidance given to him by his dissertation advisor. To the

detriment of Mr. Wang and Mr. Wang's family alone, Kotkin and Ms. Rahmani, on behalf of the University, painted a rosy picture of studying abroad in Iran and did not provide any cautionary advice.

51. By late November 2015, as a result of Kotkin's insistence and the assurances provided by the Princeton Iran Center, the Afghanistan focused dissertation project outlined in Mr. Wang's dissertation prospectus was set aside for a distinctly different, Iran-focused project.

52. Even after making this change to his dissertation prospectus, Mr. Wang continued to raise concerns about the limitations of his language visa.

53. On December 1, 2015, Mr. Wang wrote an email to Ms. Rahmani, and Dr. Harris, copying Kotkin, in which he stated, "[a]s a US citizen of non-Iranian descen[t], I think it would be preferable for me to be as transparent as possible so that I would not be deported from the country for doing things my visa does not prescribe me to do and therefore barred from entering Iran again." The next day, Mr. Wang met Ms. Rahmani in person and reiterated his concerns about the limitations of his language visa. Ms. Rahmani agreed to contact the Iranian Interest Section at the Pakistani Embassy in Washington D.C. on Mr. Wang's behalf to gain clarity on the issue.

54. On December 5, 2015, Mr. Wang emailed Ms. Rahmani indicating his plans to apply for a research visa. She replied two days later explaining that she had not yet heard back from the Interest Section, but assured Mr. Wang that his concerns about the parameters of the language visa "can be handled after the application is submitted."

55. On January 17, 2016, Dr. Harris wrote to Mr. Wang that "it's a good time to go [to Iran] – looks like they are in a good mood over there. Take advantage of it!"

56. Ms. Anastasia Vrachnos, Princeton's Vice Provost for International Affairs in 2015—2016, who would later on become the main Princeton administrator handling Mr. Wang's

case, replied to Mr. Wang's email on January 28, 2016 about his trip to Iran with an encouraging and optimistic tone that "it's an exciting and dynamic time to be there," again without any cautionary advice.

57. On January 18, 2016, Mr. Wang submitted a funding proposal to the Princeton Iran Center. The next day, he received an email indicating that the Princeton Iran Center would fully cover the costs of his initial stay and a potential extended stay for a total amount of \$12,413.18.

58. Mr. Wang was the first Princeton student who entered Iran on a U.S. passport to conduct dissertation research in Iran under the current regime. Then director of the Princeton Iran Center Prof. John F. Haldon proudly touted in an email to Mr. Wang, that his trip was "a pioneering visit for Princeton" that the school hoped would enable it "to send other graduate students to carry out research there" and "support Iranian graduates should they wish to work at Princeton."

Mr. Wang's Travel to Iran

59. On January 26, 2016, Mr. Wang set out on his first of two trips to Iran. During this trip Mr. Wang studied at the Dekhoda Institute as well as at the Iranian National Library.

60. During this first visit, Mr. Wang alerted Kotkin and other Princeton staff about the challenges he was encountering in accessing materials at the Iranian National Archives due to the limitations of his language visa's parameters. Specifically, he was unable to access the National Archives and was told that he needed to get additional permission. In response he was directed by Kotkin to remain in Iran and continue his language studies at the Dekhoda Institute, while he continued to try to obtain the access he required. Kotkin told Mr. Wang that he must very politely, very firmly overcome all of these obstacles.

61. On February 3, 2016, Mr. Wang wrote an email to Kotkin raising concerns about the inability to do research on his student language visa and explaining that "the major problem is

that foreigners cannot change [their] visa inside Iran, [so he] must leave the country and apply for a visa elsewhere.”

62. The next day, Kotkin responded stating that while Mr. Wang had “the choice of 1) using libraries (newspapers, printed materials) after daily language study; or 2) leaving to get a new visa,” Kotkin, advised that he believed Mr. Wang should stay in Iran and conduct whatever research he could. Kotkin, who possessed no specialized knowledge or information regarding Iran, continued, “be realistic, be patient. It is a cumulative process – every day, a little more.”

63. On February 8, 2016, Ms. Rahmani sent Mr. Wang an email suggesting he reach out to her father in Iran, whom she said, “can help you with anything you need through his extensive network,” including “any of your visa questions and issues.”

64. Mr. Wang followed through and paid Dr. Mostafa Rahmani (“Dr. Rahmani”) a visit in his home three days later. A staunch regime supporter, Dr. Rahmani started his conversation with Mr. Wang with a discussion of the evils of the United States government. When Mr. Wang expressed his concern about the frustration of doing research on a language visa, Dr. Rahmani advised him to stay on the language visa for the time being, and there would not be any problem.

65. Mr. Wang returned to the United States on March 9, 2016, as it was the Iranian New Year and the Dehkhoda Institute, National Library and National Archives were closed; and it was a good time to join his wife and son back home in the United States. During this brief return to the United States, Kotkin encouraged Mr. Wang to travel back to Iran again to complete additional Persian language training at the Dehkhoda Institute and conduct research for his dissertation at the Iranian National Library and Iranian National Archive.

66. On March 23, 2016, Mr. Wang reached out to Ms. Rahmani to inquire about the status of his return visa for Iran, as he had submitted a return visa application before leaving Iran.

Over a week later, on March 31, 2016, Ms. Rahmani replied to Mr. Wang stating there was nothing she could personally do at that point in time to expedite procurement of the visa.

67. Ms. Rahmani continued to say, “[w]ith Iran work, as you know, it’s always an unstable situation, and I always recommend having as many backup and alternative plans as possible.” Yet neither Ms. Rahmani nor Princeton had a backup or any alternative plans for Mr. Wang throughout either of his trips to Iran. There were no alternative plans for an apartment, obtaining proper visas, or ensuring Mr. Wang’s health and safety. Outrageously, there was no plan in place to assist Mr. Wang if in following the direction of Princeton he continued conducting research outside the language visa’s parameters the situation went awry.

68. Throughout his first and his second trips to Iran, Mr. Wang was extremely transparent with all U.S. and Iranian authorities regarding his research intentions – but Princeton was oblivious how this information would be perceived by Iranian authorities.

69. On April 30, 2016, Mr. Wang returned to Iran on a language visa. On May 1, 2016, Mr. Wang visited the Iranian Foreign Ministry’s Student Affairs Office to get approval to conduct research outside the parameters of the language visa. An official at the office informed Mr. Wang that he would be allowed to conduct research in Iran under his current passport and visa, but Mr. Wang soon came to learn, and immediately communicated to Kotkin, that the research facilities he was able to access did not include the Iranian National Archive, which might contain the materials Mr. Wang needed, resulting in the need for him to do further research outside his language visa.

70. Around the same time, Mr. Wang encountered problems accessing his Princeton emails. Princeton’s security monitoring system blocked Mr. Wang’s access after it detected “abnormal” activities on his accounts. When he contacted Princeton’s Office of Informational

Technology, he was advised it was probable that Iranian cyber police had hacked into Mr. Wang's Princeton email account and downloaded all his messages and personal information. Mr. Wang's cellphone was likely being monitored as well. His phone number changed without notice, Mr. Wang experienced delayed connections, and other strange third-party noises occurred while on the phone indicating the phone was indeed hacked and his conversations were being listened to or even recorded.

71. Mr. Wang relayed the access and hacking issues to Kotkin and others at Princeton but was again directed to remain in Iran and continue conducting research beyond the scope of what he had been authorized, in spite of being monitored. Princeton again had no alternative plans and saw no need to take protective measures on Mr. Wang's behalf. On May 6, 2016, Mr. Wang emailed Kotkin to update him on the hacking of his phone and laptop and to update him on his language and dissertation studies. In this email, Mr. Wang explained he was experiencing problems from Iranian authorities, and that he believed that having a United States passport was a "double edged sword," because being an American was even more of a reason for the Iranian authorities to falsely accuse him of espionage and to arrest and detain him. The next day, on May 7, 2016, Kotkin emailed Mr. Wang, "[c]ontinue to work along these lines, do not give up. Take some time to see what happens. Be polite, persistent." Mr. Wang remained in Iran and continued his work in a polite manner, just like his advisor instructed.

72. Mr. Azari, an Iranian researcher introduced to Mr. Wang by Mr. Ramin Karimian, – an academic contact that Dr. Harris put Mr. Wang in touch with – suggested that he would help procure documents for Mr. Wang as they would be more likely to release the documents to an Iranian researcher.

73. Mr. Wang advised Kotkin about the possibility of Mr. Azari procuring documents from the Iranian National Archives. Knowing that this was beyond the scope of Mr. Wang's authorization and knowing that Mr. Wang's phone and email were potentially monitoring Mr. Wang's communications, Kotkin did not raise any concerns.

74. On July 10, 2016, Mr. Azari received the first batch of documents for Mr. Wang. A week later, on July 17, 2016, Mr. Azari went back to receive the second batch of documents, but he was denied receipt as he was obtaining the documents for "an unauthorized foreigner."

75. Mr. Wang immediately reported this incident to Kotkin, but his response was shocking – Kotkin told Mr. Wang not to contact him via email. In his phone conversation with Mr. Wang, Kotkin did not provide any cautionary advice, but merely suggested he and Mr. Wang would speak face to face when Mr. Wang returned to the United States.

76. Princeton, which had assured Mr. Wang that it employed experts with good Iranian relations, knew or should have known and understood the gravity of the situation, and should have used their expertise and contacts to help Mr. Wang get out of the situation he found himself in as a direct result of Princeton's direction. Instead, the very experts that led Mr. Wang to believe he could safely conduct research in Iran, refused to provide any further assistance towards securing Mr. Wang's release the moment their assurances about the regime proved false. The only guidance offered was direct the Wangs to stay quiet. This guidance only served to benefit the Iranian regime at Mr. Wang's expense.

77. After approximately three months into the second trip to Iran, throughout which Mr. Wang continued to experience difficulty in obtaining access to the documents at the Iranian National Archives, Mr. Wang made plans to return home to the United States. However, on July 20, 2016, prior to his scheduled departure, the Iranian Ministry of Intelligence confiscated Mr.

Wang's passport and laptop, preventing Mr. Wang from leaving the country. Mr. Wang immediately reported it to Kotkin, Princeton's History Department, the Princeton Iran Center and Princeton's Vice Provost.

Between Passport Confiscation and Arrest

78. On July 23, 2016, in speaking with Mr. Wang, Ms. Qu suggested that he to go to the Swiss Embassy to seek sanctuary. Mr. Wang went to the U.S. Interest Section of the Swiss Embassy, which provided him with no assistance.

79. On July 24, 2016, after Mr. Wang expressed his concern about possibly being detained, Prof. John Haldon, the director of Princeton's Iran Center at the time, told Mr. Wang to "sit tight and say nothing to anyone outside the small group of people who already know about the situation." Prof. Haldon and Princeton were clearly trying to prevent Mr. Wang's situation from being known beyond the University.

80. On July 25, 2016, Ms. Qu, learned that all the Iranian experts at Princeton had declined to help her or Mr. Wang, due to their own personal safety concerns. After directing Mr. Wang to study in Iran, Princeton's Iranian experts chose not to exercise their political capital to assist Mr. Wang, while telling Mr. Wang and Ms. Qu not to involve anyone but Princeton – not even the United States government – in facilitating his exit.

81. That same day, Ms. Qu was informed that Dr. Rahmani had withdrawn from the Wang matter altogether as he also did not want to be involved. Dr. Rahmani's withdrawal should have alerted Princeton as to the gravity of the situation, but they again sat idly by, without even relaying any sort of caution or concern to Mr. Wang or Ms. Qu.

82. On July 26, 2016, Iran interrogated Mr. Wang and threatened to detain him. On the next day, Mr. Karimian, Dr. Harris' academic contact, told Mr. Wang that he might be interrogated

by Iran's paramilitary Islamic Revolutionary Guard Corp ("IRGC") disguised as diplomatic police.³ Mr. Wang immediately went to the Swiss Embassy again but was not allowed to stay there for long.

83. Princeton several times articulated to Ms. Qu that Princeton had retained the best lawyers in the U.S., some of whom were former senior State Department officials, and that she did not need to obtain her own counsel.

84. Ms. Qu asked Princeton and specifically to Ms. Vrachnos to assist Mr. Wang with seeking protection from the Swiss, but Ms. Vrachnos, leading the Princeton team working on Mr. Wang's case at the time, declined to assist with seeking protection for Mr. Wang and in fact was adamant with Ms. Qu and Mr. Wang that Mr. Wang not visit or seek sanctuary from the Swiss Embassy.

85. Furthermore, the then-Director of the Princeton Iran Center, Professor Haldon, astonishingly told Ms. Qu she could safely rule out the possibility that Mr. Wang was being setup, although of course that is precisely what happened.

86. On the same day that Princeton was insisting that Mr. Wang avoid the Swiss Embassy, his landlords returned from their vacation, and concerned for their personal well-being due to the Iranian security apparatus' apparent interest in their tenant, asked Mr. Wang to leave. Mr. Wang reported the situation to Princeton who advised that they had no means whatsoever to make another arrangement for Mr. Wang to find a place to sleep.

³ The IRGC is a paramilitary arm of the Iranian Regime charged with protecting the Islamic Revolution both domestically and internationally. The United States Department of the Treasury's Office of Foreign Assets Control has designated the IRGC as a Specially Designated National and a Specially Designated Global Terrorist pursuant to Executive Order 13224. The United States Department of State has designated the IRGC as a Foreign Terrorist Organization.

87. Despite these obvious red flags, Princeton continued to take no steps to utilize its extensive domestic and foreign contacts and expertise to extract Mr. Wang from Iran or protect him while he was there.

88. On July 27, 2016, Mr. Wang shared with Ms. Vrachnos the suspicions of Mr. Karimian that it was the IRGC that had confiscated his laptop and passport, not diplomatic police.

89. After supposedly speaking to an expert, Ms. Vrachnos called Mr. Wang to again reiterate the fact that Princeton did not think he would be arrested, and assured Mr. Wang that if he were, Princeton would do everything within their considerable power to get him out of Iran.

90. That same day, Prof. Haldon emailed Ms. Qu and, in another attempt to suppress the case, reiterated that Mr. Wang should stay low-key out of the public eye, again advised that Ms. Qu should not involve the U.S. government, and expressed Princeton's belief that Mr. Wang would not be arrested.

91. In addition, Princeton's Washington D.C. lobbyist, Joyce Rechtschaffen ("Ms. Rechtschaffen"), and Princeton's lawyer, John Bellinger ("Mr. Bellinger"), a seasoned former State Department official, also told Ms. Qu that Mr. Wang should not go to the Swiss Embassy to seek sanctuary.

92. On August 3, 2016, Ms. Qu told Princeton about the breaking news that Obama Administration released \$1.7 billion frozen Iranian assets, which included \$400 million cash that was paid as a part of the early 2016 prisoner exchange with Iran. Ms. Qu was deeply worried that Mr. Wang was being held hostage for ransom to obtain more concessions and/or money from the United States and begged Princeton to protect Mr. Wang. Ms. Qu's request was completely ignored by Princeton.

93. On August 3, 2016, Princeton instructed Mr. Wang to retain an Iranian attorney, Mr. Adib, to serve as legal counsel to Mr. Wang. Mr. Adib was a 71-year-old Francophone lawyer living in Iran, who spoke very broken English and had little to no experience regarding legal issues such as those facing Mr. Wang.

94. Mr. Adib told Mr. Wang he should retain him immediately because if he did not, and he was arrested, it would be very hard if not impossible to find and retain another lawyer. Considering all the circumstances, and as he had received the recommendation to retain Mr. Adib from Princeton, Mr. Wang signed the retainer and hired Mr. Adib as his lawyer.

95. It is inconceivable that Princeton, who claimed to have long-developed contacts and an excellent reputation in and relationship with Iran, was unable to find a more experienced lawyer for Mr. Wang, especially considering the gravity of his situation and the fact that Mr. Bellinger was the former legal advisor at the U.S. Department of State.

96. In fact, on May 24, 2017, Dr. Harris emailed Ms. Qu, “Adib is best situated to make strategic decisions. I don’t have any suggestions regarding alternative lawyers in Iran.”

97. Princeton’s team and Ms. Qu could barely communicate with Mr. Adib in English. Despite multiple requests from Ms. Qu, Princeton would not engage a translator other than Ms. Rahmani who translated a few telephone meetings with the lawyer and failed to even show up in some of the telephone meetings. Princeton ignored Ms. Qu’s request to engage a translator.

98. Princeton’s inactions coupled with their experts’ nonchalant and unreasonably optimistic attitude prior to Mr. Wang’s arrest, allowed the situation to further deteriorate.

99. Dr. Rahmani, Mr. Mousavian, and other Princeton employees made the intentional decision not to utilize their political capital in Iran to assist Mr. Wang. Specifically, Mr. Mousavian was the former spokesperson for Iran’s nuclear negotiation team and a close friend of the then-

Iranian President Hasan Rouhani and Foreign Minister Mohammad Javad Zarif. Despite their strong ties to the regime, the internal regime contacts Princeton touted in assuring Mr. Wang he would be safe chose not to utilize their political capital to obtain the return of Mr. Wang's passport and laptop, to prevent his arrest or to assist Mr. Wang when he was imprisoned inside the Evin Prison, notorious for holding and torturing political prisoners.

100. On August 7, 2016, Mr. Wang was picked up by Iranian officials who told Mr. Wang they were there to take him to the airport so he could go home. But instead, Mr. Wang was arrested for espionage charges and was taken to the notorious Evin Prison.

Post-Arrest

101. After his passport had been confiscated and during Mr. Wang's imprisonment, Princeton insisted to Mr. Wang, Ms. Qu, and later their representatives that the school would control the efforts to secure Mr. Wang's release using its contacts, including those close to the regime. Instead, hoping to preserve those relationships and protect its reputation, Princeton repeatedly and inappropriately put its interests and Iran's interests ahead of Mr. Wang and Ms. Qu.

102. On August 8, 2016, after Mr. Wang's sudden disappearance, Ms. Qu reached out to her contacts at Princeton as well as Steve Fagin, head of the Iran Desk at the U.S. State Department for assistance in locating Mr. Wang.

103. A week later, on August 14, 2016, Princeton officials told Ms. Qu that Dr. Adib had confirmed that Mr. Wang was being held at Evin Prison. Princeton officials provided no other information.

104. On September 13, 2016, Ms. Qu visited Prof. Haldon in his office seeking his help. Haldon told Ms. Qu that he would co-sign a letter drafted by Ms. Qu to the Chinese Embassy in

Tehran. Haldon asked her not to mention it to Princeton University because that would be against the University administrators' express instruction to maintain a low profile.

105. By contrast, Ms. Vrachnos made it clear to Ms. Qu that, in her view as Vice Provost, Princeton was only responsible to their undergraduate students, and not their graduate students simply because graduate students "are adults."

106. Mr. Wang was placed in solitary confinement in Evin Prison. It was not until 19 days later that Mr. Wang was allowed to call his wife. However, during those 19 days, Mr. Wang was interrogated daily for at least four hours at a time, during which he was repeatedly threatened, slapped and abused.

107. The emotional abuse and suffering to which Mr. Wang was subjected in Evin Prison was just as inhumane as the physical abuse he endured. Mr. Wang became dehumanized inside Evin Prison, which inflicted great physical and mental suffering not only on Mr. Wang, but also his entire family, especially his wife, Hua Qu, their young son, S.Q., and his mother, Kexu Lan.

108. In addition, Mr. Wang was not able to see any of his family members during his 40 months' long imprisonment, and he found it particularly painful, psychologically devastating, and heart wrenching to have missed almost four years of his son's seven years of life.

109. Having been unlawfully detained in the prime years of his mid-thirties, Mr. Wang also suffered irreversibly in his academic and professional life.

110. During his confinement, Mr. Wang was severely mentally abused. His Iranian captors falsely told him that if he made a video where he answered questions he would be let go. Having made a video of Mr. Wang that was later used for propaganda purpose, instead releasing him, the Iranian authorities forced Mr. Wang into a false confession, in which Mr. Wang had to state that he was a spy for the United States. The confession simply read, "I am an American spy."

111. On December 10, 2016, there was a two-day hearing in which a case was created against Mr. Wang and a formal trial was set for March 2017.

112. On April 26, 2017, Mr. Wang was found guilty and sentenced to ten years in prison for “infiltration” based upon spurious allegations that Mr. Wang had “gathered secret and top secret [intelligence]” for the U.S. State Department, among other foreign government entities. However, the prosecution did not and could not present any evidence of any wrongdoing by Mr. Wang himself, except for his connection to Princeton University.

113. Mr. Wang wanted to accept the sentence as that would allow him to go to a lower-security prison, but, at Princeton’s insistence, his lawyer appealed the conviction. This action forced Mr. Wang to stay in the high security section of Evin Prison for another three grueling months.

114. Princeton University was grossly unprepared to send Mr. Wang to Iran and unable to provide the most basic logistical support for Mr. Wang after his arrival in Iran, which directedly contributed to, and resulted in, Mr. Wang’s arrest, detention, torture, and physical and mental abuse.

115. Instead of taking action to assist and accelerate Mr. Wang’s release, Princeton chose instead to protect their own reputation over Mr. Wang’s health and well-being. Princeton did nothing but try to suppress news about the case while feeding Mr. Wang and Ms. Qu false assurances.

116. In an April 24, 2018 email to Ms. Qu, Princeton’s lawyer, Kevin Licciardi, reported that Mr. Mousavian asked to advise Ms. Qu “that his connection with this matter is the worst thing for Wang” and to stress to Ms. Qu, “and others who communicate with Wang, that there should be no mention of Mousavian’s name.” Mousavian “instructed that if his name comes up on a call

with Wang, [Ms. Qu] and others should . . . say that Mousavian has nothing to do with this case and that [they] have had no communications with him.” Licciardi told Ms. Qu, “you should also state that Mousavian’s contacts with Iran (the President and Foreign Minister, etc.) have all been cut off . . . [and] say that there is nothing Mousavian can do to help in this situation,” even though that very same email revealed that Mousavian had recently met with the Foreign Minister

117. Princeton directed Mr. Wang to stay in Iran and wait to be arrested, without taking any preemptive or protective measures. Rather than engaging in a determined, “all hands on deck” effort to extract Mr. Wang from an ever-worsening situation, Princeton instead was doing everything in its power to keep the case out of the public eye for their own reputation, both in Iran and in America.

118. The lack of action and urgency from Princeton is indicative of how they were more concerned with their institutional reputation and political interest than they were their student’s health and well-being. Simply put, after encouraging and convincing Mr. Wang to go to Iran, Princeton chose to put their reputation and political interest ahead of Mr. Wang’s personal safety, all to the damage of Mr. Wang, Ms. Qu, their son and Mr. Wang’s mother.

119. Princeton could have escalated the case to the highest level of the Obama and Trump Administrations and pushed for high-level action, especially considering Princeton has a strong lobbying presence in Washington D.C. Princeton could have used its high-level international contacts and their own experts to dissuade the Iranian authorities from detaining and releasing Mr. Wang. Princeton also could have resorted to the national media to create immediate international public pressure that could have prevented Mr. Wang’s arrest and detention or accelerated his release.

120. Ms. Qu reached out to the office of her Congresswoman, Bonnie Watson Coleman in spring 2017 to seek her help. The Congresswoman's office initially showed interest to advocate for Mr. Wang's release, but after a phone call with Princeton's representatives (outside of Ms. Qu's presence), the Representative Coleman's office advised Ms. Qu that there was nothing the Congresswoman could do to help Mr. Wang.

121. In fact, Princeton even refused to contact former First Lady and Princeton alumna Michelle Obama in August or September 2016 shortly after Mr. Wang was arrested.

122. Sometime after Wang's passport was confiscated and before he was arrested, the Carnegie Endowment for International Peace, advised Princeton to take the case public in the hopes that national media coverage would put the U.S. and Iranian governments under public opinion pressure. Shockingly, Princeton did not take this sound advice – rather, they did everything in their power to suppress the story from national media outlets to protect their own reputation and political interest.

123. In September 2016, Jason Rezaian, who was also formerly falsely imprisoned in Iran, heard about Mr. Wang's case and reached out to Princeton University to offer help. Princeton turned down his help.

124. Princeton consistently discouraged Ms. Qu from going public until the case was publicly announced by Iran on July 17, 2017.

125. However, even after Mr. Wang's arrest was made public, Princeton was outrageously still discouraging Ms. Qu from speaking out. On July 20, 2017, Princeton emailed Ms. Qu stating, "The University recommends against submitting a statement for the record. There is no benefit to be derived." Princeton's continued effort to suppress publicity about Mr. Wang's case after it was made public continued to put Mr. Wang at risk.. Many experts also believe staying

out of the press serves Iran as well because it helps increase political leverage for Iran and increases psychological pressure on the falsely imprisoned inmates.

126. On July 29, 2017, Kotkin wrote an email to Ms. Qu and others stating that he had turned down an interview. Despite telling Mr. Wang in 2016 that he “must very politely, very firmly overcome all of these obstacles” that he encountered from Iranian authorities, Kotkin here expressed his “strongly held” personal view that “[e]ven a very carefully crafted statement, translated into Farsi by our side, appealing to the mercifulness of the supreme ruler and the tradition of mercy in Islam, could be dangerous, by provoking the anger of the regime.”

127. In May 2018, against the wishes of Princeton, Ms. Qu eventually hired a lawyer, Jason Poblete (“Mr. Poblete”), to assist her and Mr. Wang.

128. In September 2018, Princeton’s representatives, Ms. Rechtschaffen and Mr. Bellinger, finally met with Mr. Poblete, at which meeting Ms. Rechtschaffen told Mr. Poblete, incredibly, that these situations just tend to work themselves out.

129. Ms. Rechtschaffen discouraged Ms. Qu from getting other professors, experts, academic and human rights organizations from within and outside Princeton involved. Ms. Qu later reached out to experts through her own contacts and was shockingly told, on at least two occasions, these experts had reached out to Princeton University at the early stages of the case to offer help, but were rebuffed by Princeton, who advised them that the family did not want any additional help, although neither did Princeton communicate with Ms. Qu about such help offered, nor did Ms. Qu inform Princeton that the family needed no such help.

130. Subsequently, the University of Washington Law School’s International Human Rights Clinic published a proclamation to create publicity and awareness for Mr. Wang, which

irritated Princeton as this unwanted publicity put pressure on them to take affirmative action to get Mr. Wang out of Iran.

131. All, and any, publicity regarding Mr. Wang's arrest and detention was viewed as a negative for Princeton and the Princeton Iran Center. Princeton was so concerned with controlling the public narrative and perception they hired a public relations firm to control their messaging public perception.

132. Everything Princeton did and abstained from doing was centered around absolving its institutional responsibility, protecting its institutional reputation, and maintaining its political relations with Iran. Princeton protected themselves first, hiring lawyers for themselves, refusing to reach out to experts who may have been able to help Mr. Wang, and trying to suppress Ms. Qu, all while allowing Mr. Wang rot in Evin Prison.

133. Princeton, one of the most prestigious universities in the United States, with one of the most visible Iranian Studies Program in the United States, with the Princeton Iran Center so well-endowed and well-connected, provided ruinous advice and direction to Mr. Wang and Ms. Qu and failed or refused to properly advise Mr. Wang regarding his safety and well-being. Princeton deterred steps proposed by Mr. Wang, Ms. Qu, and their representatives to involve other parties that were willing, able, and had the capacity to help, including lawyers, U.S. government officials, the Swiss Embassy, and U.S.-based experts on dealing with hostage crises. These actions by Princeton needlessly and callously prolonged Mr. Wang's imprisonment and exacerbated the harm he and the other Plaintiffs experienced and continue to experience to this day.

134. During his imprisonment, Mr. Wang was abused, and his rights and physical well-being were violated. He was held hostage by the Islamic Republic of Iran, in violation of U.S. law, for 40 months. Eventually, on December 7, 2019, due to the concerted efforts of Ms. Qu, Mr.

Poblete, members of the U.S. Congress, and the Trump Administration, Mr. Wang was freed from Iran via a prisoner exchange.

Aftermath of Mr. Wang's Lengthy Imprisonment in Iran

135. Mr. Wang's unlawful arrest and subsequent detention have caused him to suffer numerous injuries including but not limited to physical and psychological injuries, emotional injuries, and other pain and suffering, which injuries are ongoing, all to his damage.

136. Mr. Wang suffered from, *inter alia*, gastrointestinal disorder caused by enormous stress that led to approximately 20 pounds of weight loss in his first 18 days of detention. Mr. Wang continues to be impacted by physical injuries, which have required ongoing medical care since his release.

137. Moreover, throughout his detention Mr. Wang was held, without cause, in solitary confinement for extended periods of time causing psychological distress and mental psychosis. While in solitary confinement, Mr. Wang was kept in a filthy cell with no human interaction, other than being interrogated. Mr. Wang was subjected to torture, extreme isolation, the brutal conditions and relentless interrogations and sexual harassment that caused him to attempt suicide.

138. During his imprisonment, Mr. Wang constantly worried for his wife's, son's and mother's health and safety causing him additional depression and emotional anguish.

139. Mr. Wang has sought and continues to seek medical care from professionals to help treat him for his injuries.

140. These injuries continue to significantly impact Mr. Wang's ability to lead a normal life including making it difficult for him to reintegrate into family life.

141. Mr. Wang's imprisonment has also disrupted his relationship with his wife. As a result of his imprisonment and torture, the comfort that Mr. Wang and Ms. Qu once provided each other has been disrupted and continues to suffer, all to their loss and detriment.

142. Mr. Wang's imprisonment has had lasting negative repercussions on his son, during a critical time in childhood development.

143. During his imprisonment and thereafter, Mr. Wang had great anxiety and fear over the suffering his mother was going through. He has become detached from his family and friends and fears the impact of his experiences, at the hands of the Iranians, will be permanent.

144. Mr. Wang also suffered direct financial loss as a result of his unlawful arrest and detention. Although he attempted to return to his academic life at Princeton upon his return, he faced tremendous difficulties: his old project is no longer possible, he needed to start a new project, but his advisor and Princeton refused to accommodate him and kept pressing him to make academic progress like any other ordinary third year Ph.D. student, especially under the current pandemic, only to aggravate his trauma and impair his ability to make academic progress.

145. Incredibly, Princeton's administration and Kotkin have refused to provide any mechanism to accommodate Mr. Wang following his unimaginable ordeal of spending 40 months in an Iranian jail.

146. Mr. Wang also lost personal property because of his imprisonment in Iran. He has incurred significant expenses since returning from Iran to rebuild his family and professional life.

147. In addition to the injuries suffered by Mr. Wang detailed above, Ms. Qu suffered her own injuries as a result of her husband's unlawful imprisonment.

148. Among these were chronic stomach pain, migraines, worsened psoriasis, sleeplessness, depression, anxiety, constant nightmares, and extreme fear. Ms. Qu sought mental

health counseling and was prescribed medication to treat her depression and anxiety. She experienced extreme depression and anxiety when she thought about the torture and prison conditions her husband was experiencing in Iran. She also worried about the toll the detention of her husband was taking on her mother-in-law, Ms. Lan.

149. Ms. Qu's entire life was disrupted as working for her husband's release became a second full time job. Not only was she trying to support her family and young son with full-time employment, but she also worked tirelessly to advocate for her husband's release, including organizing a grassroots campaign, engaging in government advocacy and private diplomacy, managing public relations, and mobilizing a group of graduate students to provide moral and intellectual support to Mr. Wang.

150. Ms. Qu also worries about the lasting implications on her son, S.Q., and what the absence of his father during his critical years of child development have caused, all to his damage.

151. Mr. Wang's imprisonment also caused Ms. Qu's career development to be delayed and disrupted, as she had to spend considerable amount of time working on Mr. Wang's case throughout his imprisonment and therefore could not concentrate on building her own career. To this day, Ms. Qu is still struggling with the consequences of a disrupted and difficult transition while Mr. Wang's professional prospects are bleak.

152. Ms. Qu was forced to spend significant sums of money arranging for childcare for her son in order to allow her the time and space necessary to advocate for Mr. Wang's release and continue her own work and studies. Ms. Qu's parents took turns flying from Beijing to Princeton to help Ms. Qu. During a period of four years, Ms. Qu's parents hardly spent time together. After Mr. Wang's release, Ms. Qu's father went back to Beijing and was later diagnosed with exacerbated cardiovascular conditions.

153. Iran's imprisonment of Mr. Wang caused his son, S.Q., to be deprived of the service, society, guidance, solatium and consortium of Mr. Wang and to suffer extreme mental anguish and emotional pain and suffering.

154. Following his father's imprisonment, S.Q. suffered nightmares, started to exhibit behavioral problems and disconnected emotionally from his father refusing to speak with Mr. Wang when he would call from prison. In addition to enduring a physically absent father, S.Q.'s development was hindered by an emotionally distracted mother as Ms. Qu spent the duration of Mr. Wang's imprisonment consumed with securing his release and her continued stress to earn enough income to support the family and to deal with the traumas.

155. Not only was S.Q. denied the parental guidance from his father at this time, because Ms. Qu was working tirelessly for her husband's release, she was required to leave S.Q. for extended periods of time, sometimes multiple days which caused S.Q. additional fear anxiety regarding the absence of his mother.

156. S.Q. spent many more hours with babysitters, caregivers and families from his daycare, which would have otherwise not been necessary had his parents been able to be fully present in his life at this time.

157. Today, S.Q. continues to suffer from ongoing anxiety and other symptoms of childhood PTSD and other damaging conditions.

158. Mr. Wang's mother, Kexu Lan, has also been injured by Iran's imprisonment of Mr. Wang.

159. Ms. Lan lost the services, society, guidance, and solatium of Mr. Wang, and she continues to suffer extreme mental anguish and emotional pain and suffering.

160. Ms. Lan had to witness that her son was being held and languishing in Evin prison for years on end. She suffered the fear and anguish that her son would not survive. She lived in terror knowing that her son was being held in unimaginable conditions and that he was being tortured. She feared that her son would not survive, and she would never see him again.

161. Today, Ms. Lan continues to suffer from ongoing anxiety, exacerbated health conditions, and continues to fear for the health and safety of her son, and his family. She fears that her son's imprisonment has forever traumatized their family, and they each will never be able to fully recover.

FIRST COUNT
(Gross Negligence/Recklessness)

162. Plaintiffs repeat, reallege and incorporate by reference those facts and allegations set forth in all the foregoing paragraphs as if fully set forth herein.

163. Defendants Princeton University and the Trustees of Princeton, as an institution of higher learning, maintains a duty to provide a safe environment to its students, whether on campus or abroad performing research as a requirement of their coursework. Fulfillment of this duty with respect to students studying abroad includes investigating and assessing the risks associated with certain countries, advising students as to known risks present in locations considered for coursework, and implementing safeguards to mitigate against risks. In this regard, it is also the school's duty to ensure that its doctoral students all have the option of conducting their research in countries where risks to their safety, security, health and liberties are limited.

164. Defendants Princeton University and the Trustees of Princeton breached the duties to Plaintiff Xiyue Wang, and acted in a wrongful, willful, wanton, careless, grossly negligent and/or reckless manner under the circumstances:

- a. By failing to exercise even slight due diligence or care in sending the Mr. Wang to study abroad in the Islamic Republic of Iran, a foreign terror state and enemy country with no diplomatic ties to the United States and with a history of kidnapping and holding hostage American citizens;
- b. By employing professors loyal to the Iranian regime and hostile to the United States to educate Princeton students;
- c. By encouraging Mr. Wang and other Princeton students to ignore United States security policy and guidance as it relates to Iran;
- d. By advertising opportunities for students to conduct research in Iran;
- e. By directing Mr. Wang to perform research for his dissertation in Iran;
- f. By directing Mr. Wang to remain in Iran and to continue to perform research after being notified that he was not permitted to do so on his student language visa;
- g. By failing to implement safeguards to protect Mr. Wang in Iran;
- h. By failing to appropriately investigate and respond when notified by Mr. Wang that his computer was likely hacked by Iranian authorities;
- i. By counseling Mr. Wang against seeking the help of the Swiss Embassy in Iran after his passport was confiscated by Iranian authorities;
- j. By failing to provide any protection to Mr. Wang and bluntly suppressing Mr. Wang and his family's reasonable cautiousness during the three weeks after his passport and laptop were confiscated and Mr. Wang had been threatened with arrest;
- k. By failing to take adequate measures to assist with securing Mr. Wang's release from Evin Prison;
- l. By interfering with the efforts of others, including, but not limited to, Ms. Qu and the University of Washington, to secure Mr. Wang's release;

- m. By excluding Ms. Qu in Princeton's communications with third party experts on Mr. Wang's case;
- n. By deterring the help offered by others and lying to them that Mr. Wang and his family did not want outside help;
- o. By failing to provide accommodation to address Mr. Wang's reasonable requests after his release; and
- p. By otherwise outrageously and recklessly failing and/or refusing to otherwise take any and all reasonable and necessary steps to protect Mr. Wang's liberty and well-being.

165. As a direct and proximate result of the Defendants' willful, wanton, reckless, and grossly negligent actions herein described, Plaintiff Xiyue Wang was detained and held hostage in Iran's Evin Prison for 40 months, suffering numerous injuries including but not limited to physical and psychological injuries, emotional injuries, and other pain and suffering, which injuries are ongoing, all to his damage.

166. But for Princeton's willful, wanton, reckless, and grossly negligent conduct, Xiyue Wang would not have traveled to Iran for his studies and research and would not have been imprisoned and held hostage by Iran.

167. Xiyue Wang's imprisonment by Iran has damaged all Plaintiffs physically and emotionally, with injuries including but not limited to Post-Traumatic Stress Disorder, anxiety and depression. Mr. Wang's imprisonment has resulted and will continue to result in economic injury to the Plaintiffs and has caused each of them to suffer significant financial losses, to date and in the future, in amounts as will be proven at trial.

WHEREFORE, the Plaintiff, Xiyue Wang, seeks a judgment on this count against the Defendants, Princeton University and the Trustees of Princeton University, jointly and severally, for compensatory and punitive damages, pre-judgment and post-judgment interest, and costs of

suit, including an award of reasonable attorney fees, and such other relief as to this Court may seem proper and just.

SECOND COUNT
(Per Quod on behalf of Plaintiff Hua Qu)

168. Plaintiffs repeat, reallege and incorporate by reference those facts and allegations set forth in all the foregoing paragraphs as if fully set forth herein.

169. At all times relevant herein, the Plaintiff, Hua Qu, was and is the wife of the Plaintiff, Xiyue Wang.

170. During and since returning from his imprisonment in Iran, and due to the trauma and mental and physical injuries suffered there, Mr. Wang has been unable to contribute to housework, home maintenance, childcare, cleaning, cooking, and other household tasks; and his suffered a loss of consortium and the love and affection of and between husband and wife, Mr. Wang and Ms. Qu, all to their damage. As such, Plaintiff Hua Qu has continued to bear full responsibility for maintaining her family, as she did when Mr. Wang was imprisoned in Iran.

171. During and since returning from his imprisonment in Iran, and due to the trauma and mental and physical injuries suffered there, the love, affection and marriage of Mr. Wang and Ms. Qu has suffered substantially, all to their damage.

172. Prior to Mr. Wang's imprisonment in Iran, he contributed substantially to housework, home maintenance, childcare, cleaning, cooking, and other household tasks.

173. Prior to Mr. Wang's imprisonment in Iran, he had a very loving, warm and intimate relationship with his wife, Plaintiff Hua Qu.

174. As a direct and proximate result of the willful, wanton, reckless, and grossly negligent conduct of the Defendant as previously set forth, the Plaintiff, Hua Qu, sustained the loss of services, society, financial support, and consortium of her husband.

WHEREFORE, the Plaintiff, Hua Qu, demands that judgment be entered on this count against the Defendants, Princeton University and the Trustees of Princeton University, jointly and severally, for compensatory and punitive damages, pre-judgment and post-judgment interest, and costs of suit, an award of attorney fees and such other relief as to this Court may seem proper and just.

JURY DEMAND

The Plaintiffs demand a jury on all issues so triable.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that, pursuant to R. 4:25-4, the Plaintiffs hereby designate Anthony N. Gaeta, Esq. and William A. Friedman, Esq. as trial counsel; and, subject to their admission Pro Hac Vice by this Court, the Plaintiffs further designate Richard D. Heideman, Noel J. Nudelman, Tracy Reichman Kalik and Joseph Tipograph as trial counsel.

GAETA LAW FIRM, LLC
Attorneys for Plaintiffs,
Xiyue Wang and Hua Qu

/s/ Anthony N. Gaeta

ANTHONY N. GAETA

Dated: November 3, 2021

CERTIFICATION

Pursuant to R. 4:5-1, as made applicable to this Court, the Plaintiffs hereby certify that to the best of the Plaintiffs' knowledge, there is no other action presently pending or contemplated in any Court on behalf of the Plaintiffs against the Defendants Princeton University and its Board of Trustees, and this matter is likewise not the subject of any pending arbitration proceeding. The Plaintiffs further certify that no interpreter will be required for trial, nor any accommodation for disability.

I further certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

DEMAND FOR INSURANCE INFORMATION

Pursuant to R. 4:10-2(b), the Plaintiffs hereby demand production of a copy of any and all insurance agreements (primary and excess) under which the Defendants may be covered to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

DEMAND FOR ANSWERS TO FORM C AND C(2) UNIFORM INTERROGATORIES

Please take notice that pursuant to R. 4:17-1(b)(ii) the Plaintiffs demand certified answers to Form C and C(2) of the Uniform Interrogatories set forth in the Appendix to the Rules Governing Civil Practice.

GAETA LAW FIRM, LLC
Attorneys for Plaintiffs,
Xiyue Wang and Hua Qu

/s/ Anthony N. Gaeta

ANTHONY N. GAETA

Dated: November 3, 2021

**Of Counsel and Subject to Order Granting
Admission Pro Hac Vice
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Civil Case Information Statement

Case Details: MERCER | Civil Part Docket# L-002281-21

Case Caption: WANG XIYUE VS PRINCETON UNIVERSITY
Case Initiation Date: 11/03/2021
Attorney Name: WILLIAM ADAM FRIEDMAN
Firm Name: GAETA LAW FIRM LLC
Address: THE MEADOWS OFFICE COMPLEX 301 ROUTE 17 NORTH, STE 505 RUTHERFORD NJ 07070
Phone: 2019393304
Name of Party: PLAINTIFF : Wang, Xiyue
Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY
Document Type: Complaint with Jury Demand
Jury Demand: YES - 6 JURORS
Is this a professional malpractice case? NO
Related cases pending: NO
If yes, list docket numbers:
Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO
Are sexual abuse claims alleged by: Xiyue Wang? NO
Are sexual abuse claims alleged by: Hua Qu? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Business

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

11/03/2021
Dated

/s/ WILLIAM ADAM FRIEDMAN
Signed

