

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

06-22253

Case No. _____

CIV-ALTONAGA

MOTHER DOE I AND FATHER DOE I,
INDIVIDUALLY, AND AS PARENTS AND
GUARDIANS FOR MINOR R.M.,

MAGISTRATE JUDGE
TURNOFF

MOTHER DOE II AND FATHER DOE II,
INDIVIDUALLY, AND AS PARENTS AND
GUARDIANS FOR MINOR M.R.,

MOTHER DOE III AND FATHER DOE III,
INDIVIDUALLY, AND AS PARENTS AND
GUARDIANS FOR MINOR A.M.,

NIGHT BOX
FILED

SEP 07 2006

MOTHER DOE IV, INDIVIDUALLY, AND
AS PARENT AND GUARDIAN FOR
MINOR O.G.,

CLARENCE MADDOX
CLERK / SCL / MIA

MOTHER DOE V, INDIVIDUALLY, AND
AS PARENT AND GUARDIAN FOR
MINOR S.M.,

COMPLAINT - CLASS ACTION

JURY TRIAL DEMANDED

MOTHER DOE X AND FATHER DOE X,
INDIVIDUALLY, AND AS THE
PERSONAL REPRESENTATIVES OF THE
ESTATE OF MINOR JOHN DOE X,

MINORS JOHN DOES 1-10,000 (OR
GUARDIAN AD LITEM),

MOTHER DOES 1-10,000,

FATHER DOES 1-10,000; AND

MOTHER ROES 1-1000 AND FATHER
ROES, INDIVIDUALLY AND AS
SURVIVORS OF DECEASED CHILDREN,

Plaintiffs,

v.

SHEIKH MOHAMMED BIN RASHID AL
MAKTOUM,

**SHEIKH HAMDAN BIN RASHID AL
MAKTOUM,**

**ALL OTHERS SIMILARLY SITUATED,
CALLED HEREIN MOES 1-500,**

Defendants.

CLASS ACTION COMPLAINT

INTRODUCTION

This Complaint seeks redress against individuals who abducted and trafficked thousands of small boys from South Asia and Africa to the United Arab Emirates and other Arab states and enslaved them to work as camel jockeys, camel trainers and camel tenders in the desolation and heat of the Arabian Peninsula. Boys as young as two years old were stolen from their parents, trafficked to foreign lands, and put under the watch of brutal overseers in camel camps throughout the region. These claims are brought to punish the perpetrators and compensate the victims of child slavery and an international slave trade in small children that seems unimaginable in the 21st century.

Camel racing has been a favored Arab pastime for centuries. As wealth grew in the oil-rich Arabian Peninsula, camel racing grew and took on the trappings of an established sport patronized by the richest and most powerful sheikhs. So that their camels could run faster and enter into training at a younger age, the sheikhs began using small boys as jockeys and training riders. Despite the eventual enactment of legal weight and age limits, child jockeys weighing less than 20 kilograms, or 44 pounds, and usually between four years old and adolescence, became and remained the standard in races for much of the past thirty years. Boys as young as

three years old were used in training to accustom juvenile camels to carry a rider, and were at the same time trained themselves to be jockeys.

There was a ready source of slaves and a tradition of slavery in the region until very recent times. Saudi Arabia did not outlaw slavery until 1962, and although the British made the trade illicit in its protectorates, including the modern-day United Arab Emirates, the illicit slave trade persisted there throughout most of the 20th Century. Because camel racing is extremely dangerous and arduous, especially for children, the Arab sheikhs would not make their own children jockeys and trainers. The sheikhs instead bought boys who had been abducted and trafficked across international boundaries, and enslaved as young as two years old. The wealthy elite of the United Arab Emirates, including representative Defendants Sheikh Mohammed bin Rashid al Maktoum (hereinafter “Sheikh Mohammed”) and Sheikh Hamdan bin Rashid al Maktoum (hereinafter “Sheikh Hamdan”), were the most active participants in the sport in terms of the numbers of camels that they owned and raced and the numbers of boys they enslaved to care for, train and race their camels. As makers of the *de facto* rules of the sport, as hosts of the camel races, and with the knowledge that the source of child camel jockeys was the illicit slave trade, these elite sheikhs of the United Arab Emirates caused the enslavement of boys by other sheikhs, as well as conspired with them to enslave boys. A vast conspiracy flourished amongst all the camel owners participating in the sport to buy boys in the slave trade, hold them in bondage in brutal camps in the desert while extracting their labor to care for and exercise the camels, and then race against each other on race days. Because one cannot hold a camel race without competitors also bringing their own jockeys, the use of enslaved boys by the elite necessarily caused others to do the same.

In its *Trafficking in Persons Report* issued June 2005, the United States Department of State condemned the practice of wealthy Gulf-state sheikhs, including the Defendants, enslaving boys trafficked in the slave trade. The State Department minces no words in calling the practice “slavery”. In a section about the camel jockeys, it provided a picture of boys riding camels, with the caption, “Children trafficked to the Gulf states in the Middle East are forced to race camels for the entertainment of the elite. These children were training under the shadow of Dubai’s skyline in early 2005.” *Trafficking in Persons Report* at 12.

The 2005 Report further states:

The trafficking and exploitation of South Asian and African children as camel jockeys has burgeoned in the Gulf states, which with the discovery of oil and associated surge in wealth, transformed camel racing from a traditional Bedouin sports pastime to a multi-million dollar activity. Today, thousands of children, some as young as three or four years of age, are trafficked from Bangladesh, Pakistan, and countries in East Africa, and sold into slavery to serve as camel jockeys.

These children live in an oppressive environment and endure harsh living conditions. They work long hours in temperatures exceeding 100 degrees Fahrenheit, live in unsanitary conditions, receive little food, and are deprived of sleep so that they do not gain weight and increase the load on the camels they race. They are trained and kept under the watchful eyes of handlers, who employ abusive control tactics, including threats and beatings. Some are reportedly abused sexually. Many have been seriously injured and some have been trampled to death by camels. Those who survive the harsh conditions are disposed of once they reach their teenage years. Having gained no productive skills or education, scarred with physical and psychological trauma that can last a lifetime, these children face dim prospects. They often end up leading destitute lives. Trafficked child camel jockeys are robbed of their childhoods—and of their future.

This lawsuit is brought by the boys and/or the legal guardians of the boys who were enslaved, and is brought against the individual slave-owners of the United Arab Emirates and other Persian Gulf nations who directly, through agents and in conspiracy with and as accessories to others, perpetrated one of the greatest humanitarian crimes of the last 50 years.

The Defendants robbed parents of their children, and boys of their childhoods, their futures, and sometimes their lives, for the craven purposes of entertainment and financial gain.

As a proximate result of Defendants' acts, representative Plaintiffs R.M., M.R., A.M, O.G, S.M. and similarly situated John Does 1-10,000, who are all minors who were trafficked into the United Arab Emirates and other Persian Gulf states and enslaved as camel jockeys, were victims of torts committed in violation of the law of nations in the form of slavery, the slave trade, and human trafficking. Plaintiffs, Mother Does 1-10,000 and Father Does 1-10,000 suffered the loss of the society of their children. Mother Roes 1-1000 and Father Roes 1-1000 suffered the loss of their children.

Defendants Moes 1-500 were accomplices with, aided and abetted by, agents of, and/or co-conspirators with representative Defendants Sheikh Mohammed, Sheikh Hamdan and with each other, in the trafficking of, enslavement of, and slave trade perpetrated against R.M., M.R., A.M., O.G., S.M. and John Does 1-10,000.

Plaintiffs seek compensatory and punitive damages for the harm they have suffered due to Defendants' actions.

JURISDICTION AND VENUE

1. This Court has jurisdiction over Plaintiffs' claims pursuant to 28 U.S.C. § 1331 (federal question jurisdiction), 28 U.S.C. § 1350 (Alien Tort Statute), and 28 U.S.C. § 1367 (supplemental jurisdiction). This Court has personal jurisdiction over Defendants pursuant to Fla. Stat. § 48.193(2).

2. The Defendants have purposefully directed their activities within the United States making them subject to the jurisdiction of the Courts and the laws of the United States.

3. These purposeful contacts with the United States include but are not limited to:

- a. Personally operating, both as alter egos and as agents of, businesses with billions of dollars of U.S. assets and millions of dollars in Florida assets;
- b. Personally owning and operating, both as alter egos and as agents of, several U.S. corporations, including ones registered to do business in Florida;
- c. Personally effectuating large purchases and sales of billions of dollars of U.S. assets, including millions of dollars of assets in Florida;
- d. Personally visiting the United States, including Florida, in a non-official capacity both for pleasure and in operating their extensive businesses here;
- e. Owning multiple residences and hundreds of millions of dollars in investment real estate in the U.S., including in Florida; and
- f. Employing hundreds of people in the United States, and personally managing and directing those employees, including agents and employees in Florida.

4. There is no venue outside the United States in which the Plaintiffs can possibly get redress for being trafficked internationally and enslaved by the Defendants.

5. The Plaintiffs have no recourse in the United Arab Emirates, to which the boys were trafficked and where the boys were enslaved.

6. Although both employing child slaves and employing children as camel jockeys were at all times relevant to this complaint illegal in the United Arab Emirates, according to the United States Department of State, “those who own racing camels and employ the children come from powerful local families that are in effect above the law.” See *Country Reports on Human*

Rights for 1999, United Arab Emirates, released by the Bureau of Democracy, Human Rights, and Labor, U.S. Department of State, February 2000.

7. The Maktoum family, to which Defendants Sheikh Mohammed and Sheikh Hamdan belong, along with other elite families that participated in the enslavement of the Plaintiffs, are in effect above the law not only in Dubai but throughout in the United Arab Emirates. Thus, the United Arab Emirates cannot provide a venue for this action.

8. There is no forum in international courts or otherwise for the Plaintiffs to obtain compensation from the Defendants.

9. Venue is proper in Florida pursuant to 28 U.S.C. § 1391(d), which provides that, “An alien may be sued in any district.” Upon information and belief, all Defendants, including the principal Defendants Sheikh Mohammed and Sheikh Hamdan are aliens.

PARTIES

PLAINTIFFS – CLASS ACTION ALLEGATIONS

10. The Plaintiffs specifically named below (the “Class Representatives”) bring this action pursuant to Rule 23(b)(3) of the Federal Rules of Civil Procedure on behalf of themselves and all similarly situated persons and entities defined as follows:

The following persons shall be members of the class: (1) all minors or legal guardians and/or parents of minors who were abducted from Bangladesh, Pakistan, Sudan, or other South Asian or African countries and trafficked into the United Arab Emirates to be enslaved in the camel-racing industry including as camel trainers, as camel tenders and/or as camel jockeys by the named Defendants, their agents or their co-conspirators in the camel-racing industry; (2) all minors or legal guardians and/or parents of minors who were induced to travel to the United Arab Emirates from Bangladesh, Pakistan, Sudan, or other South Asian or African countries who were enslaved in the camel-racing industry including as camel trainers, as camel tenders and/or as camel jockeys by the named Defendants, their agents or their co-conspirators in the camel-racing industry.