

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

DISTRICT COURT DEPARTMENT
WRENTHAM DIVISION
CIVIL ACTION NO. 2657CV-480

JENNIFER A. NASSOUR,
Plaintiff,

v.

BRIAN SHORTSLEEVE, individually,
SHORTSLEEVE COMMITTEE d/b/a
SHORTSLEEVE FOR MASSACHUSETTS,
and THOMAS LEONARD
Defendants.

RECEIVED

8/24/2026

COMPLAINT

(JURY TRIAL DEMANDED FOR ALL ISSUES SO TRIABLE)

INTRODUCTION

This case involves claims for violation of the Massachusetts Wiretap Act, G.L. c. 272, § 99 et. al, (the “Wiretap Act”) and civil conspiracy. Plaintiff Jennifer Nassour is a private citizen and resident of Wellesley, Massachusetts, who participated in her town’s Republican Town Committee caucus on February 24, 2026 (the “Caucus”) to elect delegates to the 2026 Massachusetts Republican State Convention. Defendants are Massachusetts 2026 Republican gubernatorial candidate Brian Shortsleeve; Mr. Shortsleeve’s state-registered campaign committee – the “Shortsleeve Committee,” of which Defendant Shortsleeve is the Chairman; and Thomas Leonard, who at all relevant times has been an agent and staff member of the Shortsleeve Committee.

Under the Wiretap Act, Massachusetts requires “all party consent” in order to lawfully record another person’s communications. In the context of a Zoom meeting, excluding those that are conducted under Massachusetts’ “open meeting” laws for government bodies or actors, no participant in the meeting may be recorded without his or her knowledge and consent. If someone records any such Zoom meeting in Massachusetts using a hidden device or undisclosed application without the consent of all of the other parties to the meeting, they have violated the Wiretap Act. Distribution or publication of any such nonconsensual recording constitutes a separate and further violation of the Wiretap Act.

As detailed below, at the direction and on behalf of Defendants Shortsleeve and the Shortsleeve Committee, Mr. Leonard attended the Caucus by Zoom and – using an undisclosed device and without the consent of the Wellesley Republican Town Committee or Ms. Nassour – secretly recorded Ms. Nassour during the Caucus in violation of the Wiretap Act (the “Recording”). In further knowing and intentional violation of the Wiretap Act, Defendants have unlawfully disseminated, transmitted, and published selectively edited excerpts of their non-consensual Recording. Despite due demand from Ms. Nassour, Defendants have failed and refused to cease and remediate their unlawful misconduct.

Accordingly, Ms. Nassour seeks, among other relief, an award of statutory damages of \$100.00 per day from the date of Defendants’ unlawful Recording up to and including the final day of the trial of this action. Ms. Nassour’s statutory damages as of the date of this complaint are \$18,100.00 and continue to mount daily. Ms. Nassour also seeks punitive damages under the Wiretap Act against each of the Defendants due to intentional nature of their ongoing unlawful conduct, as well a statutory award of the reasonable attorney’s fees and costs she has incurred – and continues to incur – in vindicating her rights through this action.

THE PARTIES

1. Plaintiff Jennifer A. Nassour is an individual who resides in Wellesley, Massachusetts.
2. Defendant Brian Shortsleeve is an individual who resides at 995 Sea View Avenue in Barnstable, Massachusetts.
3. Defendant Shortsleeve Committee is a Massachusetts candidate's committee organized under the provisions of G.L. c. 55, as amended, and registered with the Massachusetts Office of Campaign and Political Finance ("OCPF"). According to OCPF records, the Shortsleeve Committee is chaired by Defendant Brian Shortsleeve and has been formed to serve as his campaign committee in connection with his candidacy for Governor of the Commonwealth of Massachusetts. The mailing address for the Shortsleeve Committee is P.O. Box 59 in Danvers, Massachusetts, and its Treasurer, Bradley T. Crate of Red Curve Solutions ("Red Curve"), maintains his place of business at Red Curve's offices at 138 Conant Street, Suite 401, in Beverly, Massachusetts.
4. Defendant Thomas Leonard is an individual who resides at 50 Aldie Street, Apartment 2, in Allston, Massachusetts.

JURISDICTION AND VENUE

5. Plaintiff reasserts and realleges the allegations in the foregoing numbered and unnumbered paragraphs as if set forth fully herein.
6. This Court has personal jurisdiction over all the Defendants pursuant to G.L. c. 223A, § 2 because they are all domiciled in, organized under the laws of, and/or maintain their principal place of business in the Commonwealth of Massachusetts.

7. Venue is proper in this Court under G.L. c. 223, § 1 because Plaintiff resides in Norfolk County and the Caucus at which Plaintiff was unlawfully recorded without consent was conducted in Norfolk County.

8. This Court has subject matter jurisdiction because the amount currently in controversy does not exceed \$50,000.

ALLEGATIONS COMMON TO ALL COUNTS

9. Consistent with the rules of the Massachusetts State Republican Party (the “Mass GOP”), the Wellesley Republican Town Committee conducted its Caucus on February 24, 2026, for the purpose of electing delegates from Wellesley to attend and vote at the 2026 Mass GOP Convention (the “Convention”). The delegates elected were empowered to vote at the Convention to determine which candidates for statewide office (*e.g.*, governor, U.S. senator) would be eligible to run in the Republican statewide primary on September 1, 2026.

10. In order to qualify for the Republican statewide primary, candidates needed to receive the votes of at least 15% of the Convention delegates. The candidate for each statewide office who received the most votes at the Convention would also receive the Mass GOP’s formal endorsement in the September 1, 2026 Republican statewide primary. The winner of the statewide primary will be the Republican nominee for Governor in the general election on November 3, 2026.

11. Defendant Brian Shortsleeve is the former director of the Massachusetts Bay Transportation Authority (the “MBTA”). He launched his campaign for Governor on or about May 12, 2025.

12. By the time of the Caucus in February 2026 Mr. Shortsleeve's campaign was struggling and at risk of failing to receive the minimum of 15% of the Convention delegates necessary to qualify for the statewide primary.

13. Rather than competing lawfully for delegate support, Mr. Shortsleeve and his campaign committee knowingly and intentionally decided to violate the Wiretap Act by having his campaign staff and agents

- illicitly record supporters of other candidates (such as Ms. Nassour) at a town caucus;
- selectively edit and unlawfully circulate and publish excerpts of their secret recordings on the internet without the consent of their targets; and
- use the unlawful recordings to attack their targets through online surrogates.

14. As alleged above, Mr. Leonard – acting at the direction of Mr. Shortsleeve and the Shortsleeve Committee – surreptitiously conducted the unlawful recording on behalf of the Defendants during the Wellesley Caucus on February 24, 2026.

15. Mr. Shortsleeve's gubernatorial campaign barely survived the Mass GOP Convention. He received the votes of 15.5% of the delegates to the Convention. The winning candidate received the support of 70.3% of the Convention delegates.

16. Despite due demand by Ms. Nassour, Defendants have failed and refused to cease, desist, and remediate their unlawful conduct.

CAUSES OF ACTION

COUNT I

VIOLATION OF THE MASSACHUSETTS WIRETAP ACT (G.L. c. 272, § 99)

17. Ms. Nassour repeats and realleges the allegations in the foregoing numbered and unnumbered paragraphs as set forth fully herein.

18. Acting on behalf and at the direction of the Defendants Brian Shortsleeve and the Shortsleeve Committee, Defendant Leonard secretly and willfully intercepted Ms. Nassour's communications during the Wellesley Caucus without her consent on February 24, 2026.

19. The Wellesley Caucus was not a public meeting or otherwise exempt from the Wiretap Act.

20. Defendants' interception was accomplished by using an undisclosed electronic, mechanical, or other device, not any recording function associated with the Zoom connection that would provide notice of the recording.

21. Defendants intercepted and covertly audio and visually recorded Ms. Nassour's communication without her consent or knowledge.

22. Thereafter, Defendants – with full knowledge of the unlawful nature of their conduct – actively and aggressively circulated and published their unlawful recording of Ms. Nassour on the internet and to third parties without her prior knowledge or consent.

23. Ms. Nassour has been injured as a result of Defendants' sustained and repeated intentional violations of the Massachusetts Wiretap Act and is an "aggrieved person" under the express terms of the statute.

COUNT II
CIVIL CONSPIRACY

24. Ms. Nassour repeats and realleges the allegations in the foregoing numbered and unnumbered paragraphs as set forth fully herein.

25. Defendants acted in concert and/or under a common scheme.

26. Defendants agreed or acted on shared intent between them to commit one or more wrongful, unlawful, or tortious act.

27. Defendants also agreed or acted on shared intent between them to engage in one or more lawful act by unlawful means.

28. One or more of the Defendant co-conspirators perpetrated an explicit, unlawful act in furtherance of their common plan.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court

- A. Find in Plaintiff's favor on all counts of her Complaint;
- B. Award Plaintiff the greater of her actual damages or statutory damages under the Wiretap Act of \$100.00 per day from February 24, 2026, through the date of judgment in this action;
- C. Award Plaintiff punitive damages under the Wiretap Act due in an amount to be determined at trial due to Defendants' knowing and willful violation of the law;
- D. Award Plaintiff her attorneys' fees and costs under the Wiretap Act;
- E. Award pre-judgment interest on all actual or statutory damages proven at trial calculated at the statutory rate of 12% per annum;

- F. Grant Plaintiff preliminary and permanent injunctive relief to assure cessation and appropriate remediation of Defendants abusive, non-consensual, and intentionally unlawful conduct; and
- G. Award Plaintiff such other relief as the Court deems proper.

PLAINTIFF DEMANDS TRIAL BY JURY ON ALL CLAIMS SO TRIABLE

JENNIFER A. NASSOUR

By her attorney,

/s/ Kevin J. O'Connor

Kevin J. O'Connor, BBO #555250

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