

ARSENÉ ETHAN MILLOGO

Full name(s)

315 N. Senate Ave, Apt C

Street address or postal box number

Indianapolis IN 46204

City, State and zip code

317-445-0663

Phone Number

FILED  
U.S. DISTRICT COURT  
INDIANAPOLIS DIVISION

10 SEP 21 AM 11:07

SOUTHERN DISTRICT  
OF INDIANA  
LAURA A. BRIGGS  
CLERK

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

**1:10-cv-1187 WTL-TAB**

Civil Action No.

(To be supplied by the Court)

ARSENÉ ETHAN MILLOGO

Plaintiff(s)

Full name(s) (Do not use *et al.*)

v.

TARA ANN BUCK and

Google Inc

Defendant(s).

Full name(s) (Do not use *et al.*)

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**CIVIL RIGHTS COMPLAINT**

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**A. PARTIES**

1. I, ARSENÉ ETHAN MILLOGO, am a citizen of INDIANA  
(Plaintiff name(s)) (State)

and presently reside at 315 N. Senate Ave, Apt C Indianapolis IN 46204  
(mailing address)

2. Defendant TARA A. BUCK is a citizen of PENNSYLVANIA  
(name of first defendant) (State)

whose address is 1 Lenape Drive, Langantown PA 19543.

3. Defendant Google Inc is a citizen of CALIFORNIA  
(name of second defendant) (State)

whose address is Privacy Matters c/o Google, Inc, 1600 Amphitheatre Pkwy  
Mountain View, California, 94043

(If more space is needed to furnish the above information for additional defendants, continue on a blank sheet which you should label "A. PARTIES." Be sure to include each defendant's complete address and title.)

#### B. JURISDICTION

1. This cause of action is brought pursuant to 28 U.S.C. § 1332 : Diversity  
of citizenships amount in controversy.

2. \_\_\_\_\_ Jurisdiction also invoked pursuant to 28 U.S.C. § 1331. (If you wish to assert jurisdiction under different or additional statutes, you may list them below.)

X/A

#### C. NATURE OF THE CASE

**BRIEFLY** state the background of your case.

On August 20<sup>th</sup> 2010, Defendant (1) created a blog calling plaintiff a scam artist, a fraudster and a sociopath. Defendant have no basics for this accusations and create this blog with malice and published it over the internet via google. Defendant (2) owns and operates the site.

#### D. CAUSE OF ACTION

I allege that the following of my constitutional rights, privileges, or immunities have been violated and that the following facts form the basis of my allegations: (If more space is needed to explain any allegation or to list additional supporting facts, continue on a blank sheet which you should label "D. CAUSE OF ACTION.")

Claim I: IC 34-15 > LIBEL AND SLANDER. Defendants published wrong, harmful, hurtful and damaging information about me over the internet.

**Supporting Facts:** (Include all facts you consider important, including names of persons involved, places, and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

This blog entry cause me to lose couple of jobs opportunity. Although the blog is anonymous I was able to gather data and communication establishing defendant identity. The blog ask individuals or everybody to isolate me and not to be in contact with me. The blog calls me to have scam several people from thousands of dollars, and attack my reputation, character, and hurt all my chances to land a job. Defendant (2) refused to remove the blog but is the only one in position to confirm the identity of defendant (1).

Claim II: the common law theory of Intentional Infliction of emotional Distress "IIED".

**Supporting Facts:**

This blog has caused me to have sleepless nights, inability to focus on school work and more importantly, it has caused me to fear that

all of my friends, acquaintances and possible employers have seen it. Therefore, I constantly stay alone in my apartment and refuse to meet others now. This blog has also affected my <sup>personal</sup> relationship to the point that I am all alone today. This blog was created with the intention of Defendant (1) to cause me distress and mentally affect me. It was intentional and she disregarded my pleas to remove it. Defendant (2) allowed all this to take place.

**Claim III:**

N/A

**Supporting Facts:**

N/A

#### E. PREVIOUS LAWSUITS

Have you been or are you now a party to any other lawsuit(s) in state or federal court dealing with the same facts involved in this action? Yes  No

If your answer is "Yes," describe each lawsuit. (If there is more than one lawsuit, describe the additional

lawsuits using this same format on a blank sheet which you should label "E. PREVIOUS LAWSUITS.")

a. Parties to previous lawsuit:

Plaintiff(s):

N/A

Defendant(s):

N/A

b. Name and location of court and docket number

N/A

c. Disposition of lawsuit. (For example, was the case dismissed? Was it appealed? Is it still pending?)

N/A

d. Issues raised:

N/A

e. Approximate date of filing lawsuit:

N/A

f. Approximate date of disposition:

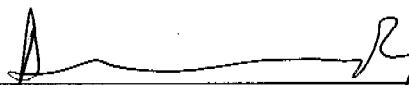
N/A

#### F. REQUEST FOR RELIEF

I request the following relief:

I request the court to order the immediate removal of the false information and the ban from entry of such blog in future. Award me with \$110,000 of damages for the lost of job opportunity and the intentional infliction of emotional distress. I also request a restraining order vs defendant (-1).

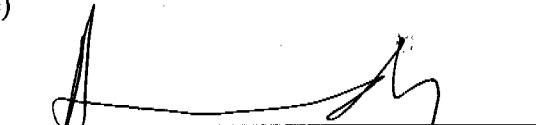
Original signature of attorney (if any)

  
Plaintiff's Original Signature

## DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained in the complaint is **true and correct**.

Executed at 315 N Senate Indianapolis 09/21/2010  
(location) (date)

  
**Plaintiff's Original Signature**

I request the Court's assistance in serving process on the defendant(s).  Yes  No

Plaintiff demands a trial by jury.  Yes  No