

ARSENE E. MILLOGO
Full name(s)

Street address or postal box number

City, State and zip code

Phone Number

U.S. DISTRICT COURT
INDIANAPOLIS DIVISION
10 SEP 23 PM 5:04
SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
CLERK

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

Civil Action No. 1:10-CV-1187-WTL-TAB
(To be supplied by the Court)

ARSENE E. MILLOGO

Plaintiff(s)

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

v. TARA ANN BUCK

Defendant(s).

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

AMENDED
CIVIL RIGHTS COMPLAINT

A. PARTIES

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

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

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

whose address is 1 Lenape drive, Margantown PA 19543.

3. Defendant _____ is a citizen of _____
(name of second defendant) (State)

whose address is _____.

(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 citizenship and 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.)

n/A

C. NATURE OF THE CASE

BRIEFLY state the background of your case.

On August 20th defendant created a blog
accusing plaintiff of being a scam artist, have
committed fraud against several individual.
The blog also called plaintiff a sociopath.
The blog is published over the internet up to this date.
Defendant operated with malice with the intent to harm
plaintiff.

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. Defendant published erroneous harmful and damaging information. This is greatly preventing Plaintiff's ability to secure employment, develop business relationships and friendships.

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.)

These blogs caused the loss of two job opportunities. Although the blog author remained anonymous, PL was able to gather correspondances establishing Defendant as the author. The blog portrays Plaintiff as an untrustworthy individual who ~~lost~~ thousands of dollars from others. These allegations are untrue. To this date, my reputation is suffering from it, my life is ~~literary~~ on hold because of these false statements

Claim II: The common law theory of Intentional Infliction of emotional distress.

Supporting Facts:

These blogs have caused Plaintiff a great deal of stress. They have caused Plaintiff to lack sleep, interest to carry on daily

activities, and most importantly, the fear and stress that all competitors, potential business partners, colleagues and friends to have read them. Defendant intended to inflict such emotional distress and this is apparent throughout both blogs. The mentioning of specific details exposing Plaintiff also attest of that.

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: _____

e. Approximate date of filing lawsuit: _____

f. Approximate date of disposition: _____

F. REQUEST FOR RELIEF

I request the following relief:

① - Immediate removal of the blogs •

② - A public and published apology to correct the wrong

③ - Order preventing Defendant from engaging in similar slander in the future.

④ - one hundred and ten (\$110,000) for lost job and emotional harm

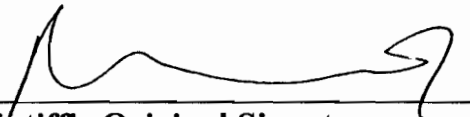
Original signature of attorney (if any)

[Signature]
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 Ave on 9/28/2010.
(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