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U.S. DISTRICT COURT

2008 JUL 18 A 9:23

UNITED STATES DISTRICT COURT  
NEW JERSEY DISTRICT

COMPLAINT

Civil Action No. 08-3622  
(JLL)

IVAN G. MCKINNEY  
Plaintiff

v.

JURY TRIAL DEMANDED

HERALD NEWS  
BERGEN RECORD  
NORTH JERSEY MEDIA GROUP  
GOOGLE  
Defendants

Each defenant is to be sued in  
official and individual capacity.

**PARTIES:**

Herald News and Bergen Record  
c/o North Jersey Media Group  
150 River Street  
Hackensack, NJ 07601

Google Corporation  
1600 ~~Main Street~~ Amphitheatre Parkway  
Mountainview California 94043

Hackensack Police Dept  
300 State Street  
Hackensack, N.J. 07601

Conklin House of Bergen County  
500 Essex Street  
Hackensack, N.J. 07601

**COMPLAINT  
(JURY DEMAND)**

**JURISDICTION** This is a Civil Rights Complaint alleging the violation of plaintiffs state and Federal Constitutional guarantees as defined by Amendments V. VI XIV of the United States Constitution in regards to slander, libel, malicious intent and defamation of character.

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1. Plaintiff Ivan G. McKinney is a citizen of the State of New Jersey.

2. Defendants, Herald News (Douglas Crouse) is a corporation organized and existing under the laws of the State of New Jersey, with its principal place of business in West Paterson, New Jersey.

3. Channel 12 News and Bergen Record are corporations who are operating within the State of New Jersey.

4. Google Inc. is a Corporation organized and existing under the laws of the State of New Jersey with its principal place of business in Mountainview, California.

5. There is complete diversity of citizenship between the plaintiff and all defendants and this matter in controversy exceeds, exclusive of interests and costs, the sum of \$ 75,000. Therefore, this court has subject matter jurisdiction of the case under the provisions of 28 U.S.C. 1332 (a).

6. Defendants Herald News, Bergen Record, News 12 and Google Inc. during the time mentioned below, did and still publishes a certian news outlet known by the above names, which are read throughout the United States and World via internet transmission.

7. Plaintiff Ivan G. McKinney is a realtor at Discount Realtors, in Ridgewood, New Jersey and is supervised by Bob Aman.

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8. Plaintiff has for many years enjoyed an excellent reputation as a private citizen and a commounity advocate and later became licensed as a real estate broker within the state of New Jersey.

9. On or about July 1, 2006 the above named defendants caused to be written, published and circulated newspaer articles and television transmissions which was circulated naming the plaintiff as a Sexual Predator, which the source of these fabrication were authored by the Clifton Police Department.

10. The articles was libel per se because it stated that plaintiff was a school teacher rapist. A copy of the article

is attached to this complaint as Exhibit A and incorporated by reference in it.

11. These statements in the article were and are completely false.

12. The defendants acted with knowledge of the falsity of the statements made in the articles and media transmissions with reckless disregard of their truth or falsity.

13. In doing these acts, defendants, and each of them intended to injure plaintiff and deprive plaintiff of the respect, confidence, and esteem peculiarly essential to plaintiff's profession, and contriving and intending to deprive Ivan G. McKinney of his good name, reputation, and the esteem of his clients and to bring the plaintiff into, scandal, ridicule, and professional disrepute before clients, professional associates, friends, neighbors and acquaintances, and the public in general, and to hold plaintiff up to public scorn, contempt, ridicule and disgrace.

14. As a result of the malicious publication and dissemination of the information contained in the above article by the defendants, the plaintiff has been deprived in the state of New Jersey of the public confidence that he had as a private citizen, and as a community advocate and Realtor. Plaintiff has suffered a tremendous amount of embarrassment, humiliation, and mental agony, and the plaintiff has been held in contempt, calumny, distrust, and ridicule.

15. The conduct of the defendants, and each of them, was despicable within the meaning of the laws of the state of New Jersey and malicious within the meaning of those laws, thus entitling the plaintiff to punitive damages from the defendants.

16. The statements were and are completely false.

17. As a result of the malicious publication and dissemination of the false information, plaintiff has been deprived in the State of New Jersey of the public confidence that he had as a private citizen and as a realtor and public advocate. Plaintiff has suffered a tremendous amount of embarrassment, humiliation, and mental agony, and has been held in contempt, calumny, distrust, and ridicule.

18. All the above named defendants have participated and are participating with unnamed and unknown persons and entities in a long-lasting conspiracy to abuse, discredit, and vilify plaintiff as a good standing member of the community by falsely accusing plaintiff of being a school teacher and rapist. The defendants and other members of this conspiracy have damaged the plaintiffs reputation, which plaintiff has endured the lost of his standing, trust and reputation.

19. All above named defendants have discriminated against the plaintiff who is male Afro-American.

20. As part of the continuing plans and conspiracy and willful and malicious motives, defendants and other members of the conspiracy supported and contributed to the publication of the known false and shameful defamation.

JURY DEMAND

21. Plaintiff requests a trial by jury.

PRAYER

Plaintiff Ivan G. McKinney request judgment:

1. Against all above named defendants jointly and severally, for the sum to exceed \$100, 000 for compensatory damages.

2. Against above named defendants in the amount an amount in excess of \$ 15, 000, 000 for punitive damages.

3. All legal and attorney fees.

4. A letter of apology from each named defendant along with a full and fair correction and retraction which shall be published effective the adjudication of this pending civil action.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11 day of July, 2008.

Ivan G. McKinney  
Ivan G. McKinney

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