

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Larry Sinclair (aka Lawrence W Sinclair),

Plaintiff, pro se,

v

Civil Action NO. 08CV 300 (JMR/RE)

Barack Obama, David Axelrod, and

Democratic National Committee,

Defendants.

COMPLAINT

NOW COMES the above listed plaintiff and shows the Court the following:

1. The following are plaintiff(s) in said action:

Larry Sinclair, Plaintiff, pro se
600 W Superior Street, #604
Duluth, MN 55802

2. The following are defendants in said action:

Barack Obama
230 S. Dearborn Street, Suite 3900
Chicago, IL 60604

David Axelrod
AKP Message and Media
730 N. Franklin Street, Suite 404
Chicago, IL 60610

Democratic National Committee
Howard Dean, Chairman
430 S Capitol Street S.E.
Washington, DC 20510

3. This action is brought pursuant to 42 U.S.C. 1981, 18 U.S.C. 241 and the First Amendment of the United States Constitutions right to Freedom of Speech. Defendants have and continue to conspire against the rights of citizens in that they are actively engaged in ongoing internet intimidation, claiming to be engaging in the conduction of illegal investigations into plaintiffs personal life, an actively involved in preventing allegations brought of illegal drug use and sexual activity involving Defendant Obama from

becoming public knowledge.

4. Plaintiff states that he personally engaged in sexual activity and personally used illegal drugs in November 1999 with U.S. Senator Barack Obama on two separate occasions. Plaintiff states that he attempted to contact defendant Obama in the fall of 2007 to advise defendant Obama to make his 1999 use of illegal drugs public himself and that if he did not do so then plaintiff would have no choice but to come forward as defendant's actions were relevant to his running for President of the United States. Defendant Obama ignored plaintiff's attempts to allow defendant Obama to reveal this information on his own.

Plaintiff then contacted numerous news papers and news networks with this information in January 2008 after it became clear to plaintiff that defendant Obama did not intend to release this information. After being advised by numerous media outlets that the Obama organization was refusing to even submit the question to defendant Obama plaintiff was forced to release the statements via video posted on Youtube.

After posting of video statement by plaintiff on Youtube, plaintiff began receiving calls from reporters as well as repeated threats of violent attacks against plaintiff's person via the internet. While meeting in person with Chicago news paper reporter plaintiff was informed that defendant David Axelrod was contacted personally regarding plaintiff's claims. Plaintiff was informed that defendant Axelrod advised said reporter they (defendants Obama and Axelrod) were aware of plaintiff's youtube video and were conducting and undercover investigation into plaintiff and plaintiff's associates.

Defendant Democratic National Committee has engaged in an active effort to slander plaintiff on defendant's official web site, allowing false statements to be made against plaintiff and has openly encouraged defendant's members to attack plaintiff.

Actions of defendants are in violation of the U.S. Constitution, violate plaintiff's right to free speech, conspire against the rights of citizens as a whole. Defendant's investigation is believed by plaintiff to be illegal and questionable as to the funding used for said alleged investigation.


Plaintiff feels his complaint holds merit under the law and that this Honorable Court has jurisdiction and standing.

5. Plaintiff respectfully moves this Honorable Court for immediate injunctive relief and request this court ORDER defendants to cease any investigation and to turn over to this court any fruits from said investigation, ORDER defendants to cease all acts of intimidation and instruct their staff and supporters to cease with intimidation and threats, ORDER defendant Democratic National Committee to remove all attack statements, smear and slanderous claims made against plaintiff on any and all sections of its official web site.

Wherefor plaintiff prays upon this Honorable Court for the right to amend Complaint at later date, and to grant plaintiff INJUNCTIVE RELIEF forthwith.

Plaintiff further moves this COURT to ORDER the withholding of plaintiff's address from being released as the making public of this information will most certainly place the plaintiff in danger of physical harm.

DONE and DATED this 11th day of February, 2008.



Larry Sinclair, Plaintiff, pro se
600 W. Superior Street, #604
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