

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA**

Lawrence Sinclair,
600 W Superior St. #604
Duluth MN 55802

Case No.: 1:08-cv-00434-HHK

Plaintiff,

COMPLAINT

vs.

JURY TRIAL REQUESTED

TubeSockTedD,
(Real name and address unknown)

mzmolly.
(Real name and address unknown)

OWNINGLIARS,
(Real name and address unknown)

Defendants.

Plaintiff Lawrence Sinclair, sues Defendants TubeSockTedD, mzmolly and OWNINGLIARS and alleges:

JURISDICTION AND VENUE

1. This is an action for damages in excess of \$75,000.00 exclusive of interest and costs sounding in defamation and reckless misrepresentation by Defendants of Plaintiff.

2. Jurisdiction of this Court is invoked pursuant to the provisions of 28 U.S.C. §1332(a)(1) as Plaintiff is a resident of Minnesota and, after a reasonable opportunity for further investigation or discovery, Plaintiff will establish that Defendants are residents of states other than Minnesota.

3. Venue in this district is proper pursuant to the provisions of 28 U.S.C. §1391(a) as, after a reasonable opportunity for further investigation or discovery, Plaintiff will establish that (i)

a substantial part of the events giving rise to the claims occurred and/or (ii) one of the defendants is subject to personal jurisdiction at the time the action is commenced in the District of Columbia.

PARTIES

4. Plaintiff, Lawrence Sinclair is a natural person and a resident of Minnesota.

5. Defendant, TubeSockTedD is a natural person maintaining an account with YouTube.com which contains his/her real identity.

6. Defendant, mzmolly is a natural person maintaining an account with Demoncraticunderground.com which contains his/her real identity.

7. Defendant OWNINGLIARS, is a natural person maintaining an account with Digg.com which contains his/her real identity.

GENERAL ALLEGATIONS

8. In or about January 2008, Plaintiff posted on YouTube.com a video in which in sum and substance he alleged that:

a. In November 1999, Plaintiff was visiting Chicago, Illinois at which time he hired a limousine from Five Star Limousines Incorporated. A copy of Plaintiff's hotel invoice is attached hereto as Exhibit "A".

b. On the evening of November 6, 1999, Plaintiff's limousine driver telephoned then-Illinois State Senator Barrack Obama to set up a introduction of Plaintiff to Mr. Obama.

c. Later that evening at a bar which Plaintiff believes was called Alibis, Plaintiff met Mr. Obama. Mr. Obama offered to purchasing cocaine for Plaintiff. Mr. Obama made a telephone call from his cellphone to a presently unknown individual during which Mr. Obama arranged the cocaine purchase.

d. Mr. Obama and Plaintiff then departed the bar in Plaintiff's limousine and proceeded to an unknown location where Mr. Obama exited the limousine with two hundred fifty dollars (\$250) tendered by Plaintiff and returned a short while later with an "eightball" of cocaine and gave it to Plaintiff. Plaintiff and Mr. Obama then ingested cocaine.

e. Shortly thereafter Plaintiff performed fellatio on Mr. Obama in the limousine after which Plaintiff returned to his hotel, The Comfort Suits, Gurnee, Illinois.

f. The following day, November 7, 1999, Mr. Obama appeared at Plaintiff's hotel room where they both again ingested cocaine and Plaintiff again performed fellatio on Mr. Obama.

9. On February 18, 2008, Defendant TubeSockTedD uploaded a video to YouTube.com which stated "Larry Sinclair is Spreading Lies about Obama". A copy of that Webpage is attached hereto as Exhibit "B".

10. On or about February 25, 2008, Defendant mzmolly posted a comment on Demoncraticunderground.com that "Larry Sinclair is a mental patient who was institutionalized in 1999 on the date he claims to have had the "encounter" with Obama." A copy of that Webpage is attached hereto as Exhibit "C".

11. On or about February 19, 2008, Defendant OWNINGLIARS posted a comment on Digg.com stating: "Larry Sinclair is a LIAR...Game Over, Larry. watch! youtube.com — For those of you who may have fallen for Mr. Sinclair's little "practical joke" about Senator Obama, you are forgiven. It's unfortunate that lonely people feel they have to lie to make friends, but there it is. It turns out that Larry was in a mental hospital at the time he says he met Barack Obama. Sorry, Larry. Game over." A copy of that Webpage is attached hereto as Exhibit "D".

**FIRST CLAIM FOR DAMAGES
DEFAMATION
DEFENDANT TUBESOCKTEDD**

12. Plaintiff repeats and re-alleges paragraphs 1 through 11 as if fully set forth herein.

13. Defendant TubeSockTedD published a false statement about Plaintiff, to wit, in sum and substance that Plaintiff was “spreading lies about Obama”.

14. Such false statement was published to third parties over the internet on YouTube.com.

15. The falsity of the statements by Defendant TubeSockTedD caused injury to Plaintiff by in his community and/or lowered him in the estimation of the community to which he belongs.

WHEREFORE, Plaintiff demands damages against Defendant TubeSockTedD of One Million Dollars (\$1,000,000) and costs and such other relief as the Court deems appropriate and just.

Plaintiff demands a Jury Trial on all issues so triable.

**SECOND CLAIM FOR DAMAGES
RECKLESS MISREPRESENTATION
DEFENDANT TUBESOCKTEDD**

16. Plaintiff repeats and re-alleges paragraphs 1 through 11 as if fully set forth herein.

17. Defendant TubeSockTedD asserted a fact as of his own knowledge, to wit, that Plaintiff was “spreading lies about Obama”, without knowing whether it was true or false.

18. In fact, Plaintiff was not spreading lies about Obama, but the truth of his allegations concerning Mr. Obama which, after a reasonable opportunity for further investigation or discovery, Plaintiff will establish can be demonstrated from existing documentary cellphone and credited card evidence.

19. As a result, Plaintiff had been damaged by Defendant TubeSockTedD’s aforesaid

reckless misrepresentation.

WHEREFORE, Plaintiff demands damages against Defendant TubeSockTedD of One Million Dollars (\$1,000,000) and costs and such other relief as the Court deems appropriate and just.

Plaintiff demands a Jury Trial on all issues so triable.

**THIRD CLAIM FOR DAMAGES
DEFAMATION
DEFENDANT MZMOLLY**

20. Plaintiff repeats and re-alleges paragraphs 1 through 11 as if fully set forth herein.

21. Defendant mzmolly published a false statement about Plaintiff, to wit, "Larry Sinclair is a mental patient who was institutionalized in 1999 on the date he claims to have had the "encounter" with Obama."

22. Such false statement was published to third parties over the internet on Demoncraticunderground.com.

23. The falsity of the statement by Defendant mzmolly caused injury to Plaintiff in his community and/or lowered him in the estimation of the community to which he belongs.

WHEREFORE, Plaintiff demands damages against Defendant mzmolly of One Million Dollars (\$1,000,000) and costs and such other relief as the Court deems appropriate and just.

Plaintiff demands a Jury Trial on all issues so triable.

**FOURTH CLAIM FOR DAMAGES
RECKLESS MISREPRESENTATION
DEFENDANT MZMOLLY**

24. Plaintiff repeats and re-alleges paragraphs 1 through 11 as if fully set forth herein.

25. Defendant mzmolly asserted a fact as of his or her own knowledge, to wit, that Plaintiff "Larry Sinclair is a mental patient who was institutionalized in 1999 on the date he claims

to have had the "encounter" with Obama" without knowing whether it was true or false.

26. In fact, Plaintiff was not "a mental patient who was institutionalized in 1999 on the date he claims to have had the "encounter" with Obama."

27. As a result, Plaintiff had been damaged by Defendant mzmolly's aforesaid reckless misrepresentation.

WHEREFORE, Plaintiff demands damages against Defendant mzmolly of One Million Dollars (\$1,000,000) and costs and such other relief as the Court deems appropriate and just.

Plaintiff demands a Jury Trial on all issues so triable.

**FIFTH CLAIM FOR DAMAGES
DEFAMATION
DEFENDANT OWNINGLIARS**

28. Plaintiff repeats and re-alleges paragraphs 1 through 11 as if fully set forth herein.

29. Defendant OWNINGLIARS published a false statement about Plaintiff, to wit, "Larry Sinclair is a LIAR...Game Over, Larry. watch! youtube.com — For those of you who may have fallen for Mr. Sinclair's little "practical joke" about Senator Obama, you are forgiven. It's unfortunate that lonely people feel they have to lie to make friends, but there it is. It turns out that Larry was in a mental hospital at the time he says he met Barack Obama. Sorry, Larry. Game over."

30. Such false statement was published to third parties over the internet on Digg.com.

31. The falsity of the statement by Defendant OWNINGLIARS caused injury to Plaintiff in his community and/or lowered him in the estimation of the community to which he belongs.

WHEREFORE, Plaintiff demands damages against Defendant OWNINGLIARS of One Million Dollars (\$1,000,000) and costs and such other relief as the Court deems appropriate and just.

Plaintiff demands a Jury Trial on all issues so triable.

**FOURTH CLAIM FOR DAMAGES
RECKLESS MISREPRESENTATION
DEFENDANT OWNINGLIARS**

32. Plaintiff repeats and re-alleges paragraphs 1 through 11 as if fully set forth herein.

33. Defendant OWNINGLIARS asserted a fact as of his or her own knowledge, to wit, that Plaintiff “Larry Sinclair is a LIAR...Game Over, Larry. watch! youtube.com — For those of you who may have fallen for Mr. Sinclair's little "practical joke" about Senator Obama, you are forgiven. It's unfortunate that lonely people feel they have to lie to make friends, but there it is. It turns out that Larry was in a mental hospital at the time he says he met Barack Obama. Sorry, Larry. Game over” without knowing whether it was true or false.

34. In fact, Plaintiff was not a liar and was not “in a mental hospital at the time he says he met Barack Obama.”

35. As a result, Plaintiff had been damaged by Defendant OWNINGLIARS’s aforesaid reckless misrepresentation.

WHEREFORE, Plaintiff demands damages against Defendant OWNINGLIARS of One Million Dollars (\$1,000,000) and costs and such other relief as the Court deems appropriate and just.

Plaintiff demands a Jury Trial on all issues so triable.

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By: /s/ Montgomery Blair Sibley
Montgomery Blair Sibley
D.C. Bar #464488

MR LARRY SINCLAIR
600 W SUPERIOR ST
APT 604
DULUTH MN 55802

E-Mail Address: jotoloco13@hotmail.com

Member Number: GP-LWS0926

Member Since: 07/16/99

If any of the above information is incorrect, please contact the Choice Service Center at 888-770-6800

Account Summary

Activity Dates 10/01/99 through 12/31/99

BEGINNING BALANCE	2,720	POINTS EXPIRING 11/30/01	9,420
POINTS EARNED	6,700		0
POINTS REDEEMED	0		
POINTS ADJUSTED	0		
CURRENT BALANCE	9,420		

Account Activity

Please allow 72 hours from date of check-out for stays to be posted. Stays earning airline miles are not listed on this statement. Please contact the Choice Service Center if you need additional information about stays or which you earned to-earn airline miles.

Activity Dates	Description	Points
	Points Earned	
11/01/99-11/02/99	CO020; COMFORT INN; ALAMOSA, CO	390
08/28/99-08/29/99	TN068; COMFORT SUITES; COOKEVILLE, TN	590
09/23/99-09/28/99	SC126; COMFORT INN Ft. Jackson; COLUMBIA, SC	3,500
11/03/99-11/06/99	IL142; COMFORT SUITES; GURNEE, IL	2,220

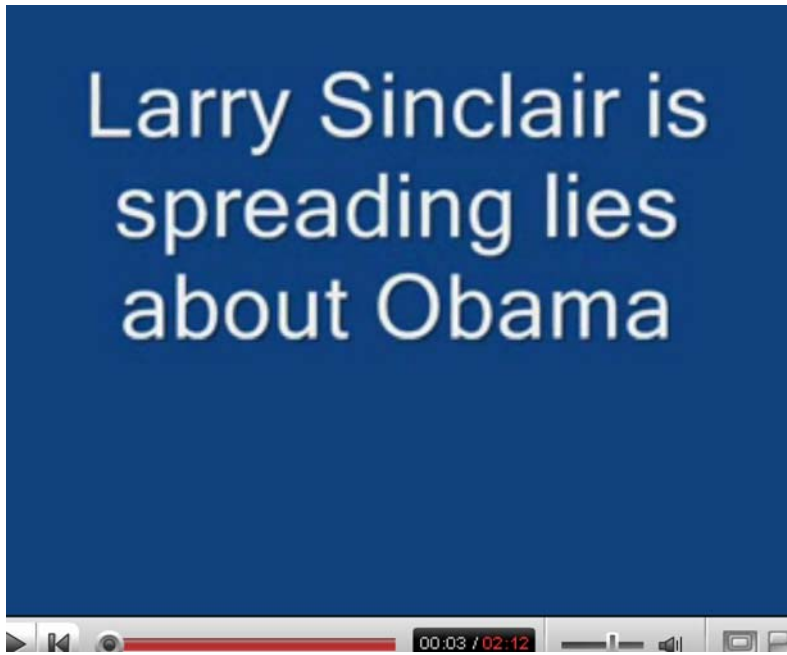
Exhibit "A"

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Lies about OBAMA'S LIMO SEX & DRUG PARTY



This is a video response to [Obama Ruined? Allegations of Homosexuality, Drug Abuse](#)

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Comments: [3](#) Favorited: 7 times Honors: [0](#) Links: [5](#)

Comments & Responses

Video Responses ([view all 1 responses](#))



[TubeSock...](#)

Text Comments (3)

[TubeSockTedD](#) (3 days ago) | [Spam](#)

Comments have now been disabled. please see the larry_sinclair myspace. Link in sidebar, to find the most current information about this sad situation.

[glenspuff](#) (6 days ago) | [Spam](#)

thank you hillary clinton for all your negative campaigning!

[tenzingyatso](#) (1 week ago) | [Spam](#)

Just amazing what evil people will do to defame this good man. Anyone with any intelligence can tell this is a load of horse shit! Obama must be doing well if they are so scared to go to these lengths of cheapness. Obama id just what America needs now!!

[mweezy](#) (2 weeks ago) | [Spam](#)

Thanks for posting this video and telling the truth about this nutjob.

[TubeSockTedD](#) (2 weeks ago) | [Spam](#)

LARRY SINCLAIR FAILED HIS POLYGRAPH TEST!!!






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Views: 17,954
-  [OBAMA'S LIMO SEX & DRUG PARTY](#)
01:42 From: [larrysinclair0926](#)
Views: 676,349
-  [LIES! OBAMA'S LIMO SEX & DRUG PARTY](#)
02:12 From: [OKKK4Obama](#)
Views: 3,931
-  [a clue the larry sinclair story is about to go mainstream](#)
00:53 From: [wesawthat](#)
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Exhibit "B"

Larry Sinclair - Lies about Obama - Documented

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mzmolly (1000+ posts)

Mon Feb-25-08 03:15 PM
Original message

Larry Sinclair - Lies about Obama - Documented



Edited on Mon Feb-25-08 03:21 PM by mzmolly

Run time: 02:12
http://www.youtube.com/watch?v=lq9QMOcD_w8

Posted on YouTube: February 18, 2008
By YouTube Member: FirehouseGallery
Views on YouTube: 14455

Posted on DU: February 25, 2008
By DU Member: mzmolly
Views on DU: 49

Additionally, I found a Larry Sinclair from Texas who contributed to the Bush Campaign and the Republican Party in 1989.

1. Larry Sinclair is a Ron Paul supporter [DIGG.COM](#)
2. Larry Sinclair is a mental patient who was institutionalized in 1999 on the date he claims to have had the "encounter" with Obama.

I know that no one here believes this nonsense, but I wanted to share regardless.

SHARE/BOOKMARK

From health care to the war on terror, the simple explanation of how the government budget really works.

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Replies to this thread

Google is our friend.	NOLALady	Feb-25-08 04:20 PM	#1
Indeed.	mzmolly	Feb-25-08 06:09 PM	#2

NOLALady (1000+ posts)

Exhibit "C"

Mon Feb-25-08 04:20 PM
Response to [Original message](#)



All » Offbeat » People

5 diggs

digg it



PROOF that "Larry Sinclair" is a LIAR...Game Over, Larry.

youtube.com — For those of you who may have fallen for Mr. Sinclair's little "practical joke" about Senator Obama, you are forgiven. It's unfortunate that lonely people feel they have to lie to make friends, but there it is. It turns out that Larry was in a mental hospital at the time he says he met Barack Obama. Sorry, Larry. Game over.

Submitted: 22 days ago

Submitter: OWNINGLIARS

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by [ZombieKilla](#) on [02/20/2008](#)

0 diggs

This guy is a toothless, coke smoking, slanderous, kook!!
His so called lawsuit will surely be dismissed. He is serving as his own lawyer!!
I'm sure you've heard the saying "a man serving as his own attorney has a fool for a lawyer"
You can see the documents on [smokingun\(dot\)com](#)
Thousands of frivolous lawsuits are filed every year and are dismissed.
Filing a lawsuit means nothing....NOTHING!!!!
LARRY=COKE SMOKING, TOOTHLESS, LIAR

By the way, he is currently living in a home for the disabled and mentally ill.....

by [tubesocktedd](#) on [02/23/2008](#)

0 diggs

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Exhibit "D"