

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

MARY KAY GREEN  
PRO SE

Plaintiff

NO.

v.

**08-0769-CV-W • FJG**

GOVERNOR SARAH PALIN  
VICE PRESIDENTIAL CANDIDATE,  
PRESIDENTIAL CANDIDATE  
JOHN MCCAIN AND RICHARD  
"RICK" DAVIS  
All in their personal and official  
capacities

Defendants

PLAINTIFF'S ORIGINAL COMPLAINT

A. The Parties

1. Plaintiff Mary Kay Green, pro se, is a citizen of the United States, a resident of Kansas City, Jackson County, Missouri, a registered voter in Jackson County, Missouri, residing at 7777 Holmes Rd. #527, Kansas City, MO 64131 and a voter for Presidential candidate and U.S. Senator Barack Obama.
2. Defendant Governor Sarah Palin, is a citizen of the United States, Governor of Alaska, Republican Vice Presidential candidate, and resides in the Governors Mansion in Juneau, Alaska; Defendant Republican Presidential Candidate John McCain is a citizen of the United States, a United States Senator from Arizona, residing in Phoenix, Arizona, and does business at McCain 2008, P. O. Box 16118, Arlington, Va. 22215; Richard "Rick" Davis is campaign manger of McCain 2008, a resident of Washington, D.C. and does business at McCain 2008, P. O. Box 16118, Arlington, Va. 22215.

## B. Jurisdiction

3. This Court has jurisdiction over this matter under 28 USC 1331 and 42 USC 1983.

## D. The Facts

4. Governor Sarah Palin is known as “the Pit Bull” of the McCain campaign and on or about October 1, 2008, with the McCain 2008 campaign floundering in the polls, she conspired with Presidential Candidate John McCain and his campaign manager Richard “Rick” Davis to begin making public speeches and television and cable advertising to engage in a McCarthy-like campaign of falsehoods, innuendo, and smear of the reputation of Presidential candidate Barack Obama.

5. From October 1, 2008, to the present, Governor Sarah Palin with the approval and under the direction of U.S. Senator John McCain and his campaign manager Richard “Rick” Davis intentionally, recklessly and irresponsibly portrayed Presidential candidate Barack Obama as un-American, a terrorist by association, and “not like us,” a non-white individual.

6. That from October 1, 2008, to the present, Sarah Palin, recklessly, knowingly and intentionally and with the approval and under the direction of John McCain and his campaign manager Richard “Rick” Davis by her falsities and hate speech played to the racial prejudices of her and John McCain supporters and worked them into a frenzy causing them to make death threats against Presidential Candidate and U.S. Senator Barack Obama with her audiences shouting “kill him,” “off with his head,” “terrorist,” “Muslim terrorist.”

7. Evidence that Sarah Palin’s words and actions against Presidential Candidate Barack Obama were knowing, reckless and intentional is and was her failure to disavow the

death treats and slanderous remarks against Presidential Candidate and U.S. Senator Barack Obama, and her open encouragement and enthusiasm for the shouts and ravings of her and John McCain's supporters.

8. John McCain, while on one occasion corrected the false accusations of one of his audience members that Presidential Candidate and U.S. Senator Barack Obama was an Arab, at no time has stopped the words and actions of Sarah Palin, or disapproved of the death threats caused by Sarah Palin, nor has he stopped the television and cable ads, shown nationally and in Missouri, a battle ground state, that he approves besmirching the character and reputation of nationally respected Presidential Candidate and U.S. Senator Barack Obama, and endangering his life but has continued the desperate McCarthy-like campaign which he openly approves and continues in his own speeches as well.

9. Plaintiff Mary Kay Green, pro se, suffered profound despair at the assassinations of her beloved leaders President John. F. Kennedy and U.S. Senator Robert Kennedy and her hero the Reverend Martin Luther King, and suffers terror of the heart, anxiety and grave fear for the life of Presidential candidate and U.S. Senator Barack Obama, and her candidate for President, due to the reckless, intentional and irresponsible speeches, ads and conduct of Governor Sarah Palin, Presidential candidate and U.S. Senator John McCain and his campaign manager Richard "Rick" Davis to which she has been subjected to here in Kansas City, Missouri, and which are beyond "shouting fire in a public theater."

10. Plaintiff has suffered actual damages and compensatory damages and continues to suffer at the hands and words of the Defendants.

11. Plaintiff seeks actual damages, compensatory damages and punitive damages and the costs of this action, *and a jury trial in Kansas City, MO.*

WHEREFORE the Plaintiff Mary Kay Green, pro se, prays the court for actual, compensatory and punitive damages and the costs of this action from the Defendants personally and in their official capacities, and prays that they cease and desist their reprehensible campaigning.

MARY KAY GREEN,  
Plaintiff Pro Se

*Mary Kay Green*

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