

FILED

Donna Lee Wray-Kane
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Clearwater, Florida
(727) 449 9419
In propria persona

11 APR 19 PM 12:32

U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

Donna Lee Wray-Kane
Plaintiff,

Case No. 8:11 cv 854 T 26 TGW

V.

WEST MEMPHIS POLICE DEPARTMENT
JOHN DOE DEFENDANTS 1 THROUGH 200
Defendants.

COMPLAINT OF OFFICAL
TORTURE KILLINGS AND
CIVIL RIGHTS VIOLATIONS
PURSUANT TO BIVINS V SIX
UNKNOWN FBI AGENTS 403

US 388

TO THE HONORABLE COURT

I. COMPLAINT

1. This is an action for damages for Torture Killings and for Loss of Consortium, and attorneys fees, for

TPA-4735
\$350

violations of International Law, and equal protection and due process clause of the 5th Article of Amendment, as well as the 6th, 7th, and 8th Amendments to the Constitution for the United States, as amended (1791).

II. CAUSE OF ACTION

2. This action arises under the Constitutions of Florida and Arkansas and for the united states of America, Article I, section 8, clause 10, Article 2, section section 11, Article III section 1 et. seq., Article VI, clause 2, (the Supremacy Clause), the 1st, 4th, 5th, 6th, 7th, and 8th Articles of Amendments of the Constitution for the united states of America, as amended (1791), and Treaties of the united states of America, "The Universal Declaration of Human Rights", Articles 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14 of "The Convention Against Torture, Cruel, Inhuman and Degrading Treatment or Punishment", Articles 1, 4, 5, 7, 9, 11, 14, 17, 18, 19, 22, and 26 of "The Covenant on Civil and Political Rights", Articles 2 (1), 3, 4(2), 7, 9(1)(4) (5), 11, 14(1)(3)(b)(d) (e), 17(1)(2), 18(1) and 26, of "The United Nations Charter", Articles 55, and 56, of the "Vienna Convention On the Law of Treaties", and "The American Declaration of the Rights and Duties of Man", and other pertinent declarations, documents and practices constituting the customary International Law of Human Rights and the "Law of Nations", as well as "The Torture Victims Protection Act of 1991", Title 28 USC 1350, note.

III. JURISDICTION AND VENUE

3. This court has jurisdiction pursuant to Title 28 USC 1331 ; 28 USC 1343, Article 2 of the Florida Constitution (deprivation of civil rights), and 28 USC 1361 (mandamus to compel an officer, or employee of the United States, or any agency thereof to perform a duty owed to the plaintiff). Jurisdiction is also invoked pursuant to 42 USC 1983, 1985, 1986 and 1988, and pertinent part of 1350. Venue is sought pursuant to 28 USC 1391(e)(3).

IV. INTRADISTRICT ASSIGNMENT

4. This matter is properly assigned to the Middle District of Florida of Florida U.S. District Court because this is a civil action that arose predominately in West Memphis Arkansas and also due to the Diversity of citizenship Title 28 USC Section 1331.

COUNT 1

CLAIM FOR VIOLATIONS OF DUE PROCESS AND ARTICLE 9(4) OF ICCPR AND ARTICLE 1 OF CAT

1. For actual and compensatory damages in an amount yet to be determined, but not less than \$75,000 dollars.
2. For reasonable attorneys fees pursuant to Title 42 USC § 1988.
3. For Plaintiffs costs herein.
4. For punitive damages in an amount yet to be determined, but not less than \$75,000 dollars.
5. For such other and further relief as the court deems proper and just.

COUNT II.

CLAIM FOR ARBITRARY ARREST AND DETENTION

1. For actual and compensatory damages in an amount yet to be determined, but not less than \$75,000 dollars.
2. For reasonable attorneys fees pursuant to Title 42 USC § 1988.
3. For Plaintiffs costs herein.
4. For punitive damages in an amount yet to be determined, but not less than \$75,000 dollars.
5. For such other and further relief as the court deems proper and just.

COUNT III

CLAIM FOR TORTURE KILLINGS

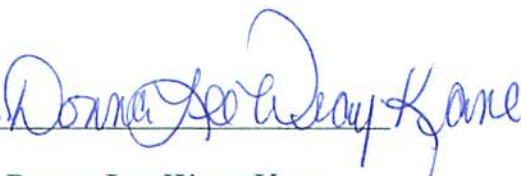
1. For actual and compensatory damages in an amount yet to be determined, but not less than \$75,000 dollars for each victim of TORTURE KILLING.
2. For reasonable attorneys fees pursuant to Title 42 USC § 1988.
3. For Plaintiffs costs herein.
4. For punitive damages in an amount yet to be determined, but not less than \$75,000 dollars.
5. For such other and further relief as the court deems proper and just.

PLAINTIFF FURTHER REQUESTS

Assurance that Plaintiff will receive timely notice of defendants motions and have ample time to traverse them.

ALL DAMAGE AWARDS TO BE PAID IN LAWFUL MONEY, ARTICLE I SECTION 10 OF THE CONSTITUTION FOR THE UNITED STATES (1791)

All damage awards as stated herein to be paid in lawful money pursuant to Article I section 10 of the Constitution for the United States (1791), gold at \$38 dollars per troy ounce, as authorized by the Par Value Modification Act, Title 31 USC § 5152.

By: 
...Donna Lee Wray-Kane
C/O 501 N MADISON AVE
CLEARWATER FL 33755
(727) 449-9419

VERIFICATION

I, the undersigned, having read the complaint, and verify from my direct and personal knowledge of its contents to be true, correct, complete, and not intended to be misleading.

That which is alleged on information and belief, I believe to be true, to the best of my ability.

Executed and Politi^{on} of 19 April 2011 at Clearwater, Florida.

By: 
...Donna Lee Wray-Kane

One of the sovereign People of Florida

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