

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

**Mara Feld,**  
*Plaintiff,*

**Civil Action No. 1:13-CV-13122**

v.

**Crystal Conway,**  
*Defendant.*

**COMPLAINT**

**PARTIES**

1. Mara Feld is natural person living in Leominster, Massachusetts.
2. Crystal Conway is a natural person living in Lexington, Kentucky.

**FACTS**

3. In November of 2010, Mara Feld arranged to have horse shipper-dealer Joseph [Spud] Noone ship Feld's thoroughbred gelding Munion to a horse farm in New Jersey, where Munion would become a companion horse.
4. Feld learned through personal investigation and Internet research that the horse was routed through the New Holland, Pennsylvania horse auction and may have been later slaughtered in Canada.
5. Munion became the topic of great debate on Internet sites which deal with thoroughbred race horses, and on Internet pages concerning horses generally.
6. At some point, Crystal Conway became involved in the ongoing online discussion and debate concerning the disappearance of Munion; or at least became aware of the discussion and debate.
7. Crystal Conway is involved in the race horse industry, and is a Bloodstock Agent at *CC Bloodstock Services* of Lexington, Kentucky.
8. *CC Bloodstock Services*, according to the organization's website, is a full service thoroughbred breeding and consulting agency.
9. Crystal Conway is also listed on *LinkedIn*, as the Office Manager at Royal Pegasus Thoroughbred Breeding Farm, Lexington, Kentucky.

10. Crystal Conway maintains a *Twitter* account known as, “Shesunskippable.”
11. On 11 December 2010 at 9:20AM, Crystal Conway posted on her *Twitter* account: “Mara Feld aka Gina Holt – you are fucking crazy!”
12. The *Twitter* posting of 11 December 2010 by Crystal Conway contains no other information except the allusion to Feld’s insanity.
13. Feld is a Doctor of Toxicology dependent on public review and endorsement of her publications.
14. Peers, professors, prospective employers, and interested parties find Feld’s work by searching the Internet for her name.
15. A search for, “Mara Feld,” on the *Google* search engine performed on 5 December 2013, located Crystal Conway’s posting concerning Feld on page-two, first entry of the search results.
16. Twitter, Inc. posts disclaimers for liability on a page titled, *Terms of Service*. “All Content, whether publicly posted or privately transmitted, is the sole responsibility of the person who originated such Content. We may not monitor or control the Content posted via the Services and, we cannot take responsibility for such Content... We do not endorse, support, represent or guarantee the completeness, truthfulness, accuracy, or reliability of any Content or communications posted via the Services or endorse any opinions expressed via the Services.” [<https://twitter.com/tos>]
17. Conduct of the kind complained of here is prohibited by Twitter. “You may not engage in targeted abuse or harassment.” [<https://support.twitter.com/articles/18311-the-twitter-rules#>]
18. On 11 December 2010, Crystal Conway published a false and defamatory communication concerning Mara Feld.

## CAUSE OF ACTION

### DEFAMATION OF CHARACTER BY LIBEL

#### ELEMENTS OF DEFAMATION IN MASSACHUSETTS

1. a false and defamatory communication
2. of and concerning the plaintiff which is
3. published or shown to a third party.

**WHEREFORE**, the Plaintiff asks for damages in the amount of \$250,000.

Respectfully Submitted,

Mara Feld by her Attorney,

\_\_\_\_\_/s/ Mark Ellis O'Brien\_\_\_\_\_

Mark Ellis O'Brien

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