

IN THE CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
(ST. LOUIS CITY)

MARK T. MCCLOSKEY and)	
PATRICIA N. MCCLOSKEY)	
PLAINTIFFS)	Cause No.
vs)	Div.
CORI BUSH,)	
Serve at: 75 North Oaks Plaza)	
St. Louis, MO 63121)	
and)	
RESHEEN ALDRIDGE,)	
Serve at: 201 West Capital Ave.,)	
Room 135-BB)	
Jefferson City, MO 65101)	
DEFENDANTS)	

PETITION

COME NOW Mark T. McCloskey and Patricia N. McCloskey and for their cause of action would state as follows:

1. Mark T. McCloskey and Patricia N. McCloskey (hereinafter the “McCloskeys”) at all times relevant hereto have been husband and wife and have maintained a residence at One Portland Place, within the City of St. Louis.
2. That Cori Bush has been at all times relevant hereto a resident of the City of St. Louis and an organizer and leader of an organization called Expect Us.

3. That Rasheen Aldridge has been at all times relevant hereto a resident of the City of St. Louis who has also been an organizer and leader of Expect Us.

4. That Expect Us has been at all times relevant hereto an organization created by the Defendants and utilized for the purpose of employing civil disobedience and mob action to intimidate, frighten and coerce the people and government of St. Louis through racist rhetoric and violent conduct toward persons and property.

5. That Bush and Aldridge participated, aided and abetted, ratified, tacitly consented to and promoted a pattern of riotous conduct and periodically called out and assembled mobs for the purpose of unlawfully and violently terrorizing the honest residents of St. Louis including Plaintiffs.

6. That on and before June 28, 2020, Bush and Aldridge published a call to action to assemble a mob at the intersection of Maryland Ave. and Euclid Ave.

7. Such a mob was in fact assembled on the evening of June 28, 2020 and was inflamed and encouraged to act out violently and was whipped into a frenzy through racist and provocative language being shouted, chanted and screamed by Bush and Aldridge.

8. That Bush and Aldridge had planned to deploy the mob into the private neighborhoods of the Central West End of the City of St. Louis for the purpose of terrorizing the residents thereof.

9. That Bush and Aldridge had published in their call to the mob, "They think it's a game! Plus, we have a surprise." (see Exhibit 1 attached hereto). That the "surprise" was to break into Portland Place, a Private Place, terrorize individuals and trespass upon and destroy private property.

10. That on the evening of June 28, 2020, at the direction of the Defendants, the mob, in full knowledge of the private nature of Portland Place, and after passing three different signs expressly stating the that Portland Place was private property and that trespassing was forbidden, broke into Portland Place, destroyed a 132 year-old historic gate and stormed into Portland Place and onto property owned, both in whole and in part, by the Plaintiffs. (see Exhibit 2 attached hereto).

11. That upon entering Portland Place, the Defendants' mob, including armed men and men in armor, shouted threats of murder, rape arson and destruction at the Plaintiffs.

12. That after being repelled by the Plaintiffs through the exercise of their Second Amendment rights, Bush and Aldridge called out their forces again for the purpose of attacking the home of the Plaintiffs and terrorized the Plaintiffs on Friday, July 3, 2020.

13. That once again, the Defendants' mob descended upon the home of the Plaintiffs with chants of "Burn the Mother Fucker down" and other threats of violence and racial hatred.

14. That once again, the Plaintiffs resisted the onslaught of the mob and preserved their lives, their home and their property.

COUNT I

Come now Plaintiffs, and for Count I of their Petition would state as follows:

15. Plaintiffs repeat and reallege paragraphs 1-14 above and incorporate the same herein for all purposes.

16. That by and through the above referenced actions, Bush and Aldridge engaged in a conspiracy to incite violence against the Plaintiffs and called for the destruction of their property

and the harm to the Plaintiffs and participated, directly and/or indirectly, in the unlawful trespass onto the Plaintiffs' property, the destruction of their property and the threats to and intimidation of the Plaintiffs.

17. That by and through the above referenced actions, Bush and Aldridge engaged in a conspiracy to incite the mob to terrorize the Plaintiffs, to attempt to intimidate them and cause them to fear their loss of life and property and participated in, directly and/or indirectly, the terrorism and attempt at intimidation of the Plaintiffs.

18. That in fact the mob did act pursuant to Defendants' instruction, organization and incitement to attack Plaintiffs and their property

19. That as the direct and proximate result of the above referenced intentional wrongful acts on the part of the Defendants, the Plaintiffs have suffered the following actual damages:

- a) The immediate shock and terror of hundreds of screaming, chanting, cursing, threatening and violent persons on their property;
- b) Their wrongful prosecution by a woke, politically motivated, George Soros funded prosecutor and the cost of legal defense thereto;
- c) The costs, monetary and emotional, of being harassed by the leftist media and their fascist cronies;
- d) The costs of defending and fortifying their home and office; and
- e) The costs of temporary and permanent replacement of and reinforcement to the Portland Place gate.

20. All of such damages were incurred as the result of the intentionally malicious actions on the part of the Defendants thereby subjecting such Defendants to punitive or exemplary damage.

WHEREFORE, Plaintiffs respectfully pray for judgement in their favor and against the Defendants for actual damages in such amount as is fair and reasonable under the circumstances together with punitive damages in such an amount as to be in fact punitive and likely to discourage like behavior in the future on behalf of these Defendants and others similarly situated, pre and post judgement interest and such other and further relief as this Court deems just and proper.

Respectfully submitted,

MCCLOSKEY, P.C.

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