

Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

IN THE CIRCUIT COURT OF ST. CHARLES COUNTY, MISSOURI

Official Court Document Not an Official Court Document Not an Official Court Document

DANNY ROBERSON)

Not an Official Court Document Not an Official Court Document Not an Official Court Document

Plaintiff,)

Case No. _____

v.)

Division _____

RACHEL HOMOLAK)

an Official Court Document Not an Official Court Document Not an Official Court Document

Serve at:)

Rachel Homolak)

REQUEST FOR JURY TRIAL

Unknown)

Madison, Alabama)

JW)

Serve at:)

Unknown)

Vanessa Hagedorn)

Serve at:)

214 Twin Burch Ct.)

Lake Saint Louis, MO 63367)

GRACE CHURCH STL)

Serve at:)

2695 Creve Coeur Mill Rd.)

Maryland Heights, MO 63043)

Jane Puszkar)

Serve at:)

16 Spring Mill Wood Ct.)

St. Charles, MO 63363)

Chris Barrett)

Serve at:)

Unknown)

Defendants.)

COMPLAINT FOR DAMAGES

COMES NOW Plaintiff, Danny Roberson, by and through her attorney, and for her cause of action against Defendants Rachel Homolak, JW, Vanessa Hagedorn, Grace Church St. Louis ("GCSTL"), Jane Puszkar, and Chris Barrett, alleges and states as follows:

Table of Claims

<u>CLAIM</u>	<u>PAGE NO.</u>
1. Defamation with Alternatives	
a. Rachel Homolak	28
b. JW	96
c. Vanessa Hagedorn	99
d. Grace Church St. Louis	106
e. Jane Puszkar	117
f. Chris Barrett	121
2. Civil Conspiracy	
a. Homolak, Puszkar, and Grace Church St. Louis	128
b. Homolak and Barrett	131

Parties and Jurisdiction

1. Plaintiff is a citizen of the Unites States, residing in St. Charles County, Missouri.
2. Plaintiff is a private individual and not a public figure.
3. All counts in this Complaint are brought under the laws of the State of Missouri for defamation and civil conspiracy.
4. Some, if not all, of the allege unlawful practices took place in St. Charles County, in the State of Missouri.

5. Jurisdiction and venue are proper in the Circuit Court of St. Charles County pursuant to RSMo. § 508.010.

General Allegations Common to All Counts

BACKGROUND INFORMATION

- 6. All attached exhibits are incorporated by reference herein.
- 7. Plaintiff was assigned the sex of male at birth but does not comport with the traditional sex stereotypes of a person assigned the sex of male.
- 8. Plaintiff identifies as non-binary and trans-femme, meaning she uses feminine (she/her) and gender neutral (they/them) pronouns rather than masculine (he/him) pronouns.
- 9. Plaintiff expresses her non-binary gender identity by wearing a combination of traditionally masculine and feminine clothing, make-up (mascara and eye shadow) and her natural facial hair.
- 10. Plaintiff is an employee at the [REDACTED] (“Library”).
- 11. Plaintiff dresses in at least business casual attire for work at the Library which is the required dress code.

MAY 24, 2023, INTERACTION

- 12. On or about May 24, 2023, Homolak entered the Library where Plaintiff was working.
- 13. Plaintiff was working the children’s desk when Homolak entered the library.
- 14. Every employee at the Library must take turns monitoring the children’s desk.
- 15. Upon seeing Plaintiff’s appearance, Homolak left the building.
- 16. Homolak never spoke with nor directly interacted with Plaintiff in any fashion.
- 17. Upon information and belief, Homolak did not approve of Plaintiff’s appearance.

18. Homolak called the Library and requested to speak with [REDACTED] who directed her to the [REDACTED].

19. [REDACTED] spoke with Homolak on the phone for over an hour regarding the employee dress code and explained to Homolak that her complaint was the first [REDACTED] had ever received regarding Plaintiff's appearance.

20. Homolak was not satisfied with this conversation, so [REDACTED] set up a one-on-one meeting with Homolak for later that week on May 26, 2023.

21. Following the phone conversation with Homolak, Library administration offered Plaintiff paid time off and her desk schedule was altered so she no longer worked at or near the front entrance.

22. Plaintiff's employer took the aforementioned action for Plaintiff's protection after Homolak's meeting with Plaintiff's employer.

23. Upon information and belief, Homolak made some type of threat or allegation which caused Library administration to take action to protect Plaintiff and her safety.

24. Sometime after the phone conversation with [REDACTED], but before the scheduled May 26, 2023, meeting, Homolak posted on social media about the Friday meeting asking others to join her cause. Exhibit. A.

25. In her posting, Homolak misstated and exaggerated Plaintiff's appearance.

26. Homolak did so to foment outrage and encourage others to support her in her false representations about Plaintiff.

27. Homolak stated that Plaintiff was a man dressed in drag who wore heavy makeup, large black hoop earrings, nail polish, and had a goatee. *Id.*

28. Homolak further accused Plaintiff of trying to push her “sexual identity” onto the public, including children. *Id.*

29. By posting on social media that Plaintiff was pushing “sexual identity on the public, especially children,” Homolak openly and falsely accused Plaintiff of sexual misconduct.

30. Homolak caused her false statements about Plaintiff to be published to multiple other persons when she posted these accusations on social media. *Id.*

31. Homolak posted an open invitation attributing sexual misconduct to Plaintiff and encouraging others to call [REDACTED] and to attend her one-on-one meeting. *Id.*

32. At least one other community member, identified as JW, made a graphic and posted it to social media in furtherance of Homolak’s false statements about Plaintiff. The title of the graphic states, “We are not Groomers!” Exhibit B.

33. In so posting the graphic, Defendant JW further published Homolak’s false statements and added to those statements a further false statement implying Plaintiff is a “groomer,” meaning a person who either encourages or induces others, especially children, through mental manipulation to engage in sexual conduct.

34. Merriam-Webster defines a groomer as “someone who grooms a minor for exploitation and especially for nonconsensual sexual activity.” <https://www.merriam-webster.com/dictionary/groomer>.

35. Through the post, Homolak encouraged other people to show up in numbers to show Kuhl she was not the only person dismayed by Plaintiff’s appearance at the Library. *Id.*

36. These posts included enough information for library patrons to clearly identify Plaintiff as she is the only gender nonconforming employee at the Library who has facial hair and wears make-up.

37. Homolak's call for action resulted in approximately seventy-five (75) people arriving outside of the Library during the scheduled meeting time.

38. As a result of Homolak's call for action attempting to turn the meeting into a public referendum about Plaintiff, [REDACTED] canceled the meeting.

39. Plaintiff suffered extreme discomfort, distress, embarrassment, and humiliation due to the gathering and the subsequent protest outside of her place of employment.

JUNE 2023 INTERVIEWS

[REDACTED]

40. On June 2, 2023, Homolak was a guest on the radio show [REDACTED] Exhibit C.

41. The live radio show was recorded, and the video is posted on the [REDACTED] Facebook page.

42. This recorded interview had over 2,900 views as of December 2023. The number of live listeners is unknown.

43. During this interview, the host stated that he heard Plaintiff wore miniskirts, fishnet stockings, and high heels when Plaintiff worked at the Library.

44. Homolak did not correct him, agreed that she had heard "dozens" of similar stories from community members, and added corset to the list of inappropriate clothing she falsely attributed to Plaintiff and what she allegedly wore at work.

45. Homolak also stated that the worst part of all this is that Plaintiff works in the children's department and falsely insinuated that Plaintiff was trying to endanger and sexualize children by the way she dresses.

46. The next week on June 9, 2023, Homolak appeared on the [REDACTED]

Exhibit D.

47. During this interview, Homolak said that children seeing Plaintiff is abusive to them, falsely accusing Plaintiff of child abuse. *Id.*

48. Further, Homolak stated, “drag exists because of sex and because of that, they keep going for the children.” *Id.*

49. Homolak clearly intended to implicate Plaintiff in this statement as Homolak unequivocally described Plaintiff’s appearance as “drag” multiple times during and prior to this interview.

50. Referencing the community as a whole, but in a targeted conversation about Plaintiff, Defendant Homolak stated during the show that, “they are coming for the children because they are impressionable,” thereby falsely implying Plaintiff constitutes a danger to children. *Id.*

51. Homolak’s comments falsely portrayed Plaintiff as abusive to children and that she has a sexualized motivation behind her appearance and in her choice of employment as a librarian.

52. During this interview, Homolak published false statements about Plaintiff and cast Plaintiff in a false light intending to cause harm to Plaintiff’s reputation in the community and at Plaintiff’s place of employment.

JUNE 2023 COMMUNITY MEETINGS

June St. Charles City-County Council Meeting

53. On June 12, 2023, Homolak attended a St. Charles City-County Council (“SCCCC”) meeting posing as a caricature of Plaintiff. Exhibit E.

54. The video of the meeting has at least 1,200 views and the number of live attendees is unknown. *Id.*

55. Homolak wore bright pink eye shadow, fake goatee facial hair, a corset over a t-shirt, fishnet stockings, a mini skirt and 2-inch heels, though she claimed that was the best she could do instead of 4-inch heels like Plaintiff allegedly wears to work at the Library. *Id.*

56. Homolak falsely claimed Plaintiff wears leather and a dress that opens around the “crotch” while making a circle and pointing to her upper thigh area. *Id.*

57. Homolak further referred to Plaintiff as a man dressed in drag, similar to how she was dressed that day, working at the Kathryn Linneman branch library. *Id.*

58. Homolak’s statements clearly identified Plaintiff as the alleged “drag” librarian at the [REDACTED] on this and multiple previous occasions.

59. Homolak’s speech was aimed at creating fear of Plaintiff within the community by falsely accusing Plaintiff of sexual misconduct.

60. Following Homolak, Hagedorn spoke. *Id.*

61. Hagedorn alleged that children seeing a person dressed in a gender nonconforming way causes them confusion. *Id.*

62. She further stated this confusion is abusive to children, publicly and falsely implying Plaintiff abuses children. *Id.*

63. Hagedorn then proceeded to say that community members do not go to the library to find out someone’s sexual identity or preference. She stated that “sexually expressing” oneself in front of children is not appropriate. *Id.*

64. Finally, Hagedorn repeated twice that “children’s safety should never be compromised due to a grown man’s feelings.” *Id.*

65. The foregoing statement by Hagedorn clearly implied falsely that children were unsafe around Plaintiff.

66. Hagedorn falsely portrayed Plaintiff as a sexual predator and danger to children.

67. Taken in their proper context, it is clear Hagedorn's statements were about and singled out Plaintiff specifically.

June Library Board Meeting of June 20, 2023

68. Prior to the June 20, 2023, Library Board meeting, Homolak posted on social media through her St. Charles Library Mama Bear Facebook page encouraging others to attend the Library Board meeting, under the pretext of demanding a dress code for employees.

Exhibit F.

69. Additionally, Defendant GCSTL posted on their Facebook page encouraging its "church family" to attend the Library Board meeting in support of Homolak. Exhibit G.

70. In the post, Defendant GCSTL called for all employees to adhere to a public standard dress code, which meant no alleged drag or sexual expression. *Id.*

71. Defendant GCSTL's post falsely insinuated Plaintiff was engaging in sexual misconduct when she dressed for work in a manner that did not comport with traditional gender stereotypes.

72. Defendant GCSTL's post further states "We must protect CHILDREN from being exposed to this!!!", which referred to Plaintiff and insinuated that Plaintiff presented a danger to children. *Id.*

73. The entirety of Defendant GCSTL's post falsely portrayed Plaintiff as a sexual predator and a person harmful to children.

74. Additionally, Defendant GCSTL's post encouraged its members to attend and speak, and to contact Defendant Homolak as the organizer of the civic engagement group attending the board meeting.

75. Defendant GCSTL sanctioned, supported, aided, and abetted Homolak in the dissemination of Homolak's false assertions of sexual misconduct attributed to Plaintiff made at the June 20, 2023, meeting.

76. Over three hundred and fifty (350) people attended the June 20, 2023, Library Board meeting due to Homolak's and GCSTL's calls to action.

77. During the public comment section, which lasted for over an hour and half, a majority of the comments were related to a dress code for Library employees. Exhibit H.

78. Many people made comments referring directly to or related to Plaintiff and it was obvious all discussion surrounding any alleged dress code was really about Plaintiff. *Id.*

79. The video recording of the meeting has over three hundred and fifty (350) views. *Id.*

80. Homolak spoke at the meeting during the public discussion section. *Id.*

81. Homolak reiterated several false statements she had previously made publicly regarding Plaintiff's appearance. *Id.*

82. Homolak further stated falsely that Plaintiff wore BDSM-like kink drag to work around children. *Id.*

83. Homolak claimed the Library was complicit in sexualizing children by allowing Plaintiff to dress the way she does, further reiterating the false public narrative about Plaintiff. *Id.*

84. Puszkar spoke after Homolak. *Id.*

85. Puszkar referred to Plaintiff as a transvestite and that Plaintiff's purpose at the library is to indoctrinate children. *Id.*

86. The term “transvestite” is typically understood by reasonable persons as derogatory and Puszkar used the term intentionally to foment hatred in a public forum towards Plaintiff.

87. Puszkar’s statement that Plaintiff’s purpose at the library was to “indoctrinate” children was intended to be understood as an alleged intention to indoctrinate children into a life of alleged sexual misconduct.

88. Puszkar’s statement that Plaintiff’s purpose at the library was to indoctrinate children was false both in its literal sense and in its implication that Plaintiff was allegedly there to “indoctrinate” children into a life of sexual misconduct.

89. Puszkar continued by stating that a drag queen works in the children’s section of the library and this is harmful to children. *Id.*

90. Finally, Puszkar insinuated Plaintiff’s intent while working at the Library was to gain access to children, ostensibly for the purpose of engaging in sexual misconduct with children. *Id.*

91. Puszkar publicly and falsely accused Plaintiff of sexual misconduct and potentially criminal misconduct.

92. Hagedorn spoke at the June 20, 2023, Library board meeting as well. *Id.*

93. Hagedorn repeated a very similar speech to the June 12th SCCCC meeting. *Id.*

94. On this occasion, Hagedorn added the false assertion that Plaintiff’s presence in the Library is psychologically abusive to children and is psychological warfare on children. *Id.*

95. Hagedorn publicly and falsely accused Plaintiff of sexual misconduct and potentially criminal misconduct.

96. Other persons in the community raised concerns over the dress code following the lead of Homolak, Puszkar, and Hagedorn. *Id.*

97. Following Defendants' comments and posts, persons who had never seen or met Plaintiff while she worked at the Library accused her of preying on children and sexualizing them.

Id.

98. Plaintiff started to fear for her life and physical safety at the meeting due to the hatred openly directed towards her as a result of Defendants' false portrayals of her as a child sexual predator.

99. The following week on June 29, 2023, Homolak posted Exhibit I to her "St. Charles Library Mama Bear" Facebook page. This post contained a meme with the words. "... All I'm saying is that if the phrase 'Leave the kids alone' is an attack on a certain group, then maybe that group deserves to be attacked."

100. When replying to a comment on the post, Homolak stated, "Confusing kids and forcing sexual ideology and expression on them is child abuse." *Id.*

101. Homolak falsely portrayed Plaintiff as a child abuser who deserves to be "attacked" in her June 29, 2023, post.

102. Plaintiff was the clear target of Defendants' comments at the June 20, 2023, Library Board meeting and the clear target of Homolak's reposting of the meeting on Facebook.

JULY TALK SHOW APPEARANCE

103. On or about July 10, 2023, Homolak gave an interview with talk show host, [REDACTED] [REDACTED]. Ex. J.

104. Homolak repeated the same false statements about the way Plaintiff dresses, including 4-inch heels, miniskirts, fishnet leggings, and added a harness to list of clothing items falsely attributed to Plaintiff. *Id.*

105. Homolak intentionally and publicly cast Plaintiff in a false light again during this interview.

106. Homolak further falsely stated that by wearing the clothes that align with Plaintiff's gender identity, Plaintiff was "sexually expressing" herself for children in the children's department at the Library. *Id.*

107. Homolak again claimed that by hiring Plaintiff, the Library was promoting the sexualization of children. *Id.*

108. Towards the end of the interview, Homolak stated, "They are pushing sex and sexual ideology on children. Sex and children do not mix. That's how you get pedophilia." *Id.*

109. Homolak then alleged pedophilia is prevalent in the LGBTQ community.

110. Homolak took her false allegations against Plaintiff to a new level by calling her a pedophile, as implied within the context of Homolak's comments about Plaintiff.

JULY COMMUNITY MEETINGS

July Library Board Meeting

111. The Library Board held a regular meeting on July 18, 2023, which was not recorded.

112. The board meeting on July 18, 2023, still had over 100 citizen attendees.

113. Prior to Homolak's crusade against Plaintiff, a handful of citizens would attend the meetings.

114. During the July 18, 2023, meeting, more hateful comments were directed towards Plaintiff about her appearance during the public comment section as a direct result of Defendants' actions to engender hatred for Plaintiff in the community.

115. In response, Library Board president, [REDACTED], stated, “the Library does indeed have a dress code policy that was approved by the Board of Trustees. The dress code policy does require a professional appearance and work appropriate attire, is neutral and meets the requirements of Missouri and federal employment law.”

116. [REDACTED] further emphatically stated, “The Library’s dress code is enforced. Staff are not permitted to wear inappropriate attire to work and management has in the past, and will continue to, enforce the dress code policy.”

117. [REDACTED] made a point to comment on a subject the Library Board normally refrains from because of the inordinate amount of attention it was garnering in the meetings.

118. Plaintiff was again publicly embarrassed and humiliated by being made the center of attention at the July 18, 2023, Library Board meeting due to the actions of Defendants.

119. After attending the July 18, 2023, meeting, Homolak persisted in her campaign to destroy Plaintiff’s reputation within the community through spreading false information about Plaintiff by refusing to acknowledge that the Library already had a neutral dress code and that Plaintiff followed said dress code.

120. On Monday, July 19, 2023, Homolak posted on her “St. Charles Library Mama Bear” Facebook page about the SCCCC’s alleged decision to vote on a resolution to enforce the library dress code. Exhibit K.

121. In the comments, Homolak used Plaintiffs actual given name for the first time. Exhibit L.

122. Upon being asked about Plaintiff’s appearance, Homolak told someone to go checkout “Danny the Drag Librarian” for themselves. *Id.*

123. Homolak's post cast Plaintiff in a false light, falsely insinuating Plaintiff was a drag queen and performer.

124. Additionally, the reference to Plaintiff using Plaintiff's actual given name on July 19, 2023, further established Plaintiff was the intended target of all of the previous comments, representations, and false allegations Defendants had made.

July 31, 2023, SCCCC Meeting

125. On July 31, 2023, the SCCCC held a meeting in which Defendants Homolak and Barrett spoke during the public comment section. Exhibit M.

126. This meeting was in a large meeting hall filled with an unknown number of people.

127. A video of the meeting is posted to the SCCMOTV YouTube page, which is the St. Charles County government's television station, and had approximately 1,900 views as of December 2023. *Id.*

128. During this meeting, Barrett spoke first asking the council to adopt a uniform dress code for the Library. *Id.*

129. Homolak stood up to take a video of Barrett's speech. *Id.*

130. Barrett specifically referenced a man working at the St. Charles public library in the children's section and alleged that they were dressing inappropriately in front of kids.

Id.

131. Barrett told the SCCCC that by allowing Plaintiff to work in the Library dressed as she does, they are causing sexualization of children. *Id.*

132. Barrett's comments directly referred to Plaintiff and accused Plaintiff of engaging in sexual misconduct in public. *Id.*

133. Although Barrett's comment alleged the Library was promoting sexualization of children, the effect of Barrett's comments were to falsely attribute sexual misconduct to Plaintiff.

134. Upon information and belief, Barrett was recruited by Homolak to attend the meeting as a representative of the organization "Gays Against Groomers."

135. Homolak recruited Barrett to further disseminate false information about Plaintiff and to repeat Homolak's falsehoods in order to further foment hatred and rage towards Plaintiff and to add the appearance of community support against Plaintiff from persons within the LGBT community.

136. Homolak spoke next. *Id.*

137. During her speech, Homolak specifically referred to Plaintiff by name. *Id.*

138. The portion of Homolak's speech where she references Plaintiff's name was removed from the video footage after the fact because of her conduct.

139. Homolak told the SCCCC that it was their job to protect children from this psychological warfare, meaning the way Plaintiff dresses. *Id.*

140. After naming Plaintiff publicly, Homolak further stated that Plaintiff was pushing her sexual agenda on children and that children are being forced to witness a sexual predator in Plaintiff. *Id.*

141. Homolak openly accused Plaintiff of sexual misconduct during the SCCCC meeting.

142. Homolak conspired with Barrett to defame Plaintiff's character at a public meeting by recruiting Barrett to speak publicly in support of Homolak's assertions.

143. Barrett conspired with Homolak by agreeing to speak publicly in support of Homolak.

144. Barrett subsequently posted a clip of both of their speeches to his Facebook account. Exhibit N.

145. Part of the caption includes, “Here’s me and Rachel Homolak speaking out against a pervert in Saint Charles, Missouri who thinks he has the right to dress as a woman while having a beard and working in the children’s section of the library.” *Id.*

146. Barrett accused Plaintiff of sexual misconduct by calling Plaintiff a pervert. *Id.*

147. The [REDACTED] organization posted the clip to their social media platforms as well. Exhibit O.

148. Upon information and belief, Bennett caused the clip of his speech with Defendant Homolak to be published on the [REDACTED] social media platforms.

149. Defendant Homolak reposted the [REDACTED] posts onto her “St. Charles Library Mama Bear” Facebook page and stated, “Glad to have [REDACTED] on board!” *Id.*

SOCIAL MEDIA AND AUGUST 2023 APPEARANCES

150. Homolak manages several Facebook accounts.

151. One of Homolak’s larger accounts is the Bluey Memes group.

152. This group is a place to post memes about the children’s television show Bluey.

153. Bluey is an Australian based television show.

154. In or about the September of 2023, the Bluey Memes Facebook page was followed by over three hundred and four thousand (304,000) Facebook users. Exhibit Q.

155. On August 1, 2023, Homolak posted on the Bluey Memes page a video of the July 31 SCCCC meeting with the caption, “SHOULD CROSSDRESSING MEN RUN THE CHILDREN’S SECTION OF THE LIBRARY???” The answer is NO!” Exhibit P.

156. By posting the SCCCC video to Bluey Memes Homolak further published video of her July 31, 2023, speech wherein she falsely accused Plaintiff of being a sexual predator.

Id.

August Civic Engagement Meeting at GCSTL

157. GCSTL holds a monthly Civic Engagement meeting. It’s Civic Engagement group encourages people to “act out our faith by mobilizing the church to engage at the local and state levels in a variety of ways.”

158. The group held its monthly meeting for August on August 10, 2023, and a recording of this meeting can be found in Exhibit S.

159. The event was titled “Engaging the Enemy – A Panel Discussion.”

160. Homolak and other church members who were active speaking within their local community comprised the panel.

161. A blogpost about the event explained that the panel focused on how other church members could get involved in advocating at the local government level for the conservative side. Exhibit R.

162. The blogpost stated that the “agendas” the group was pushing against were “same-sex bathrooms in public schools, pornographic books in schools and public libraries, mandatory masks and vaccines, **the sexual grooming of preadolescent children**, and ‘transition plants’ without parental consent” (emphasis added). *Id.*

163. During opening remarks for the panel, Homolak introduced herself as the St. Charles Library Mama Bear and gave a brief explanation of her initial interaction with Plaintiff. Exhibit S.

164. Homolak ended her introduction by stating she is fighting against Plaintiff who she alleged is indoctrinating and grooming children. *Id.*

165. The panel discussed their own experiences with engaging in the local community, how others can get involved, and the best practices for community engagement. *Id.*

166. Homolak warned others about how they might be censored if they release private personal information during a public meeting. *Id.*

167. Homolak explained that she stated Plaintiff's name during a SCCCC meeting, and it was censored out. *Id.*

168. Homolak then proceeded to say Plaintiff's full first and last name, including that Plaintiff works at the [REDACTED]. *Id.*

169. GCSTL's moderator for the panel told Homolak to not worry, they were not going to censor Defendant Homolak for stating Plaintiffs name. *Id.*

170. The blogpost encouraged church members to get involved in whatever way they can whether that be helping with Defendant GCSTL's civic engagement team or by attending county council meetings. Exhibit R.

171. One speaker talked about how using a larger group can be really helpful and that he has used Facebook groups and social media to spread his message. Exhibit S.

172. Homolak stated that she has groups and different circles that she is a part of to get the word out about events. *Id.*

173. One speaker explained that he gained courage to speak at local community functions because the first time he spoke, there was a large crowd of congregants from GCSTL.

174. The panel discussed how many of them have had experiences speaking in front of local government and felt comforted because they saw so many congregants from GCSTL.

175. Panelists added that it helped them feel comfortable speaking, partially because they knew the audience was full of people who share their views. *Id.*

176. At the end of the Panel, the Civic Engagement team host gave a few announcements. *Id.*

177. During the announcements, she told the crowd that if they were planning on going to a school board or other kind of meeting, to let them know and representatives of GCSTL would gather a group to go and support them. *Id.*

178. This included supporting and facilitating Homolak's activities.

America's Mom Talk Show

179. On August 11, 2023, Homolak appeared on the talk show [REDACTED]

[REDACTED] Exhibit T.

180. The host started the show by stating, "If you've been paying attention and you think it's wrong for grown men to wear lipstick, wear dresses, and twerk in front of small children, you would be called a bully today, just as our guest Rachel Homolak." *Id.*

181. Homolak did not correct [REDACTED] clear insinuation that Plaintiff would twerk in front of small children. *Id.*

182. During the show Homolak specifically referenced Plaintiff by calling her Danny the Drag Librarian who works at the [REDACTED] in St. Charles, Missouri.

Id.

183. The sentence was framed in a way that implied Plaintiff and/or the Library had adopted the name “Danny the Drag Librarian” on their own accord, which is false as Plaintiff is not a drag queen.

184. The “Danny the Drage Queen” name was made up by Homolak and her movement.

185. [REDACTED] asked Homolak if anyone had run a background check on Plaintiff because people like Plaintiff often have a lengthy rap sheet of inappropriate behavior. *Id.*

186. [REDACTED] stated that she was not saying that Plaintiff had a rap sheet but that she would love to see Plaintiff’s background. *Id.*

187. Homolak did not correct [REDACTED] and instead nodded her head in agreement. *Id.*

Rosary Rally

188. On or about August 15, 2023, Homolak organized a Rosary Rally with the organization [REDACTED].

189. The flier for the event states, “A man in our library dressed as an overly sexualized woman is part of the LGBTQ agenda in their attempt to groom and sexualize our young, innocent children.” Exhibit U.

190. The flier makes several false egregious claims about Plaintiff being oversexualized.

191. Upon information and belief, Homolak dispersed these fliers in the community.

192. On or about August 30, 2023, Homolak posted on her Bluey Memes pages regarding a conversation she had with a transgender journalist. Exhibit V.

193. The story was about the Facebook group and how it has become a vehicle for posting conservative, transphobic comments, some of which related to Plaintiff and the Library.

194. The post had over 700 likes and was viewed by significantly more people, though the number is unknown. *Id.*

195. In the comment section of the post, someone commented in part, “is there a pedophile at the library!!!!” *Id.*

196. Homolak did not remove the post insinuating Plaintiff is a pedophile and allowed it to remain in place for anyone to see.

197. Homolak posted a link to her [REDACTED] appearance in the comments. *Id.*

198. Further down the comment stream after posting the link to Exhibit T, Homolak commented, “any grown man who wants to sexually express himself in front of children, seems like a pedophile to me.” Exhibit V.

199. In the context of the conversation, it was clear that Homolak was referring to Plaintiff and falsely accusing Plaintiff of pedophilia.

IN PERSON HARASSMENT OF PLAINTIFF

200. On or about July 31, 2023, Plaintiff’s work schedule was published in a Facebook group called [REDACTED] of which Homolak is a known member. Exhibits A & W.

201. In that comment, the author stated, “Also You could request to see the photos in private to Rachel Homz.” Exhibit W.

202. Rachel Homz is a name used by Homolak in Facebook groups. Exhibit A.

203. Upon information and belief, Defendant Homolak obtained a copy of Plaintiff's work schedule and either published it to the aforementioned Facebook page herself or caused it to be published by providing Plaintiff's schedule to another with the intent that it be so published.

204. Homolak posted on November 30 to her "St. Charles Library Mama Bear" Facebook group a post of a Goosebumps book with the title "Drag Story Hour."

205. The cover has children running scared from adults wearing rainbows. Exhibit X.

206. In the post description, Homolak posted, "Except it's every day in the children's section over at the [REDACTED]." *Id.*

207. Homolak's reference to "every day in the children's section at [REDACTED]" clearly referred to Plaintiff and was intended to cast Plaintiff in a false light.

DECEMBER 2023 AND JANUARY 2024 RADIO APPEARANCES

208. On December 12, 2023, Homolak appeared again on the [REDACTED] to discuss her crusade against Plaintiff. Exhibit Y.

209. Homolak started by telling the story of how she encountered Plaintiff the first time, again calling Plaintiff a male dressed in drag running the children's section of the Library. *Id.*

210. Homolak again stated that Plaintiff's attire and presence at the library constituted sexual inappropriateness in front of children. *Id.*

211. When Homolak made the foregoing statement, she publicly and falsely accused Plaintiff of sexual misconduct.

212. On January 9, 2024, the interview from December 12 was replayed by the [REDACTED], making the same accusations. Exhibit Z.

213. On February 29, 2024, Homolak again appeared on [REDACTED] to discuss her crusade against Plaintiff and the Library. Exhibit AA.

214. Homolak repeated her previous false statements about Plaintiff and called her a drag employee, cross dresser and pedophile. *Id.*

DEFENDANT GCSTL'S AIDING AND ABETTING

215. On or about March 19, 2023, Senior Pastor [REDACTED] gave a sermon titled "Real Christianity in a Woke Culture." Exhibit BB.

216. In his sermon, [REDACTED] actively urged congregants to attend board meetings of public schools and like organizations for the purpose of confronting persons publicly whom they believed to be sinners. *Id.*

217. [REDACTED] urged the congregants to take action and admonished them that "silence is violence." *Id.*

218. [REDACTED] especially urged congregants to take action to oppose persons who are members of the "LGBT crowd." *Id.*

219. Upon information and belief, one of the congregants who heard [REDACTED] sermon was Homolak.

220. Upon information and belief, another of the congregants who heard [REDACTED] sermon was Defendant Puszkar.

221. Both Homolak and Puszkar acted upon [REDACTED] admonition and subsequently engaged in public opposition to LGBTQ+ persons, especially opposing recognition and acceptance of transgender persons generally, and including Plaintiff specifically.

222. On June 19, 2023, one of GCSTL's lead pastors [REDACTED] lead a sermon titled "What is a Man?" Exhibit CC.

223. [REDACTED] and Missouri State Representative [REDACTED] were guest speakers to discuss this topic. *Id.*

224. Pastor [REDACTED] started the service off with announcements. During this section he told the crowd that GCSTL was taken off of YouTube again due to the content of their sermons. The crowd cheered. *Id.*

225. During the sermon, [REDACTED] stated that we don't have enough men around to say get those drag queens away from our kids, to which the crowd applauded, and Pastor [REDACTED] nodded his head. *Id.*

226. [REDACTED] explained that a man will do whatever god tells him to do to keep his family safe. *Id.*

227. All three men expressed their open disdain for transgender people, which was brought up many times during the sermon. *Id.*

228. The panel discussed how most churches in the St. Louis area are too cowardly and afraid of losing their non-profit status with the IRS to speak the truth. [REDACTED] said if GCSTL loses their status, they will just tithe more and figure it out because spreading their work is more important than tax savings. *Id.*

229. [REDACTED] explained the reason he chose to worship at GCSTL was because of their values, how vocal the church is about those values and that the church encouraged community engagement. *Id.*

230. Upon information and belief, Homolak and Puzskar attended this service and harkened to the pastor/speaker's call to action against LGBTQ and specifically transgender persons.

231. In or around October 2023, GCSTL's Civic Engagement group held a monthly meeting which was later posted to Sound Cloud. Exhibit DD.

232. The meeting started with an announcement regarding the St. Charles Libraries.

233. The speaker mentioned Homolak and her fight against the Library.

234. Further, the speaker stated that GCSTL Civic Engagement members had been attending library board, city council and county council meetings for four months to speak against Library practices.

235. The beginning of GCSTL Civic Engagement members attending and speaking at library, city, and county council meetings coincides with the beginning of Homolak's activities attacking Plaintiff with falsehoods.

236. Upon information and belief, Homolak is also a member of GCSTL's Civic Engagement group.

237. Upon information and belief, GCSTL sent its' church members to various community meetings to support Homolak's false statements about and unfounded attacks on Plaintiff's character.

ATTEMPTED ATTACK ON PLAINTIFF

238. On or about April 17, 2024, a community member entered the Library and approached Library staff.

239. This community member asked to talk to the "guy who works in the children's section in drag," meaning Plaintiff.

240. Library staff asked this community member why he wanted to speak with Plaintiff to which he replied he wanted to verbally antagonize Plaintiff to the point where Plaintiff would take a "swing" at him.

241. The community member continued that he wanted to push Plaintiff to a point where she initiated physical contact so he could then “punch [Plaintiff] in the face.”

242. Plaintiff was scheduled to work the day this person entered the Library and just happened to take a sick day off.

243. Upon information and belief, this community member knew Plaintiff’s schedule because of previous leaks and anticipated her being at work to antagonize and fight.

Not an Official Court Document

COUNTS FOR DEFENDANT RACHEL HOMOLAK

COUNT 1 - DEFAMATION

244. Plaintiff incorporates by reference herein all preceding paragraphs.
245. When Homolak posted Exhibit A to Facebook on or about May 24, 2023, Homolak accused Plaintiff of sexual misconduct by saying Plaintiff was dressed in drag and forcing her sexuality on children.
246. Plaintiff was the only Library employee who could have been identified as the person Defendant references in her post.
247. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.
248. Homolak knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.
249. Homolak intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.
250. Homolak knew other third parties would read her statements about Plaintiff.
251. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.
252. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count I in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 1 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

253. Plaintiff incorporates by reference herein all preceding paragraphs.

254. When Homolak posted Exhibit A to Facebook on May 24, 2023, Homolak portrayed Plaintiff in a false light as a sexual predator pushing her sexuality on children at the Library.

255. In Exhibit A, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

256. This statement cast Plaintiff in a false light publicly.

257. Homolak’s claims of sexual misconduct attributed to Plaintiff were false.

258. Homolak knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

259. Homolak intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

260. Homolak’s false claims of misconduct attributed to Plaintiff are highly offensive to an objective reasonable person and further subjectively offensive to Plaintiff.

261. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count I in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 1 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

262. Plaintiff incorporates by reference herein all preceding paragraphs.

263. When Homolak posted Exhibit A to Facebook on May 24, 2023, Homolak intentionally singled out Plaintiff to speak negatively of her.

264. Posting on social media is not inherently an illegal activity.

265. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

266. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

267. There is no legitimate justification for Homolak's conduct harming Plaintiff.

268. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy,

mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count I in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

**COUNT 2 - DEFAMATION
DEFENDANT HOMOLAK**

269. Plaintiff incorporates by reference herein all preceding paragraphs.

270. When Homolak spoke on the radio show [REDACTED] in Exhibit C, Homolak accused Plaintiff of sexual misconduct by accusing Plaintiff of sexualizing children through her clothing and appearance.

271. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

272. Homolak knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

273. Homolak intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

274. Homolak knew other third parties would hear her statements about Plaintiff.

275. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

276. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 2 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendants with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 2 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

277. Plaintiff incorporates by reference herein all preceding paragraphs.

278. When Homolak spoke on the radio show [REDACTED] FM in Exhibit C, Homolak portrayed Plaintiff in a false light as a sexual predator.

279. In Exhibit C, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

280. This statement cast Plaintiff in a false light publicly.

281. Homolak's claims of sexual misconduct attributed to Plaintiff were false.

282. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

283. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

284. Homolak's false claims of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

285. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 2 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 2 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

286. Plaintiff incorporates by reference herein all preceding paragraphs.

287. When Homolak spoke on the radio show [REDACTED] in Exhibit C, Homolak intentionally singled out Plaintiff to speak negatively of her causing harm to Plaintiff's reputation and standing within the public opinion.

288. Appearing and speaking on a radio show is not inherently an illegal activity.

289. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

290. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

291. There was no legitimate justification for Homolak's conduct harming Plaintiff.

292. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 2 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 3 - DEFAMATION

DEFENDANT HOMOLAK

293. Plaintiff incorporates by reference herein all preceding paragraphs.

294. When Homolak appeared on the [REDACTED] in Exhibit D, Homolak accused Plaintiff of sexual misconduct by implying Plaintiff is a sexual predator, abuses children, and only dresses the way she does to sexualize children.

295. Homolak appeared on the show specifically to discuss Plaintiff and Homolak's experience at the Library when Plaintiff was present.

296. Homolak's false comments were clearly about Plaintiff.

297. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

298. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

299. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

300. Homolak knew, or reasonably should have known, other third parties would hear her statements about Plaintiff.

301. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

302. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 3 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for

pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 3 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

303. Plaintiff incorporates by reference herein all preceding paragraphs.

304. When Homolak appeared on the [REDACTED] in Exhibit D, Homolak made broad and sweeping derogatory statements about transgender persons generally.

305. Homolak also portrayed Plaintiff in a false light as a sexual predator.

306. In Exhibit D, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

307. Homolak’s statements cast Plaintiff in a false light publicly.

308. Homolak’s accusations of sexual misconduct attributed to Plaintiff were false.

309. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

310. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

311. Homolak’s false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

312. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 3 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 3 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

313. Plaintiff incorporates by reference herein all preceding paragraphs.

314. When Homolak appeared on the [REDACTED] in Exhibit D, Homolak intentionally singled out Plaintiff to speak negatively of her.

315. Appearing on the talk show is not inherently an illegal activity.

316. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

317. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

318. There was no legitimate justification for Homolak's conduct harming Plaintiff.

319. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy,

mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 3 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 4 - DEFAMATION
DEFENDANT HOMOLAK

320. Plaintiff incorporates by reference herein all preceding paragraphs.

321. When Homolak presented at the SCCCC meeting as shown in Exhibit E, Homolak falsely accused Plaintiff of sexual misconduct by accusing Plaintiff of having a sexualized intent behind wearing such clothing.

322. Homolak was clearly discussing Plaintiff as Plaintiff is the only employee at the Library who is transfemme.

323. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

324. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

325. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

326. Homolak knew or reasonably should have known other third parties would hear her statements about Plaintiff because SCCCC meetings are publicly held and recorded meetings.

327. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

328. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 4 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

**ALTERNATE COUNT 4 - FALSE LIGHT – INVASION OF PRIVACY
DEFENDANT HOMOLAK**

329. Plaintiff incorporates by reference herein all preceding paragraphs.

330. When Homolak presented at the SCCCC meeting as shown in Exhibit E, Homolak portrayed Plaintiff in a false light as a sexual predator by accusing her of wearing inappropriate clothing with a sexualized intent.

331. In Exhibit E, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

332. This statement cast Plaintiff in a false light publicly.

333. Homolak's accusations and caricature of Plaintiff as illustrative of sexual misconduct attributed to Plaintiff were false.

334. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

335. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

336. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

337. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 4 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 4 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

338. Plaintiff incorporates by reference herein all preceding paragraphs.

339. When Homolak presented at the SCCCC meeting as shown in Exhibit E, Homolak intentionally singled out Plaintiff to speak negatively of her.

340. Speaking at the SCCCC meeting is not inherently an illegal activity.

341. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

342. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

343. There was no legitimate justification for Homolak's activities harming Plaintiff.

344. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 4 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 5 - DEFAMATION

DEFENDANT HOMOLAK

345. Plaintiff incorporates by reference herein all preceding paragraphs.

346. When Homolak spoke at the June 20, 2023, Library Board Meeting as shown in

Exhibit H, Homolak falsely accused Plaintiff of sexual misconduct by falsely stating

Plaintiff wore BDSM-like kink drag to work around children, and that Plaintiff is

sexualizing children by dressing the way she does around children.

347. Homolak's speech was clearly about Plaintiff as the entire meeting was devoted to

a Library dress code standard that Homolak started to push for because of Plaintiff.

348. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

349. Homolak either knew the allegations of sexual misconduct Homolak attributed to

Plaintiff were false and/or made such statements with willful and reckless disregard for the

truth.

350. Homolak either intended to harm Plaintiff through her conduct and/or engaged in

such conduct with willful and reckless disregard for any damage her conduct would cause

Plaintiff.

351. Homolak knew other third parties would hear her statements about Plaintiff because

she presented to a group of at least three hundred and fifty (350) people, and the meeting

was recorded and posted online.

352. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant,

objectively offensive to any reasonable person, and further subjectively offensive to

Plaintiff.

353. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 5 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 5 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

354. Plaintiff incorporates by reference herein all preceding paragraphs.

355. When Homolak spoke at the June 20, 2023, Library Board meeting as shown in Exhibit H, Homolak portrayed Plaintiff in a false light as a sexual predator by accusing her of dressing in a sexualized manner, wearing BDSM-like kink drag to work around children, and for sexualizing children through her appearance.

356. During the meeting, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

357. This statement cast Plaintiff in a false light publicly.

358. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

359. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

360. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

361. Homolak's false accusations of misconduct attributed to Plaintiff were highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

362. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 5 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 5 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

363. Plaintiff incorporates by reference herein all preceding paragraphs.

364. When Homolak spoke at the June 20, 2023, Library Board meeting as shown in Exhibit H, Homolak intentionally singled out Plaintiff to speak negatively of her.

365. Presenting at the Library Board meeting is not inherently an illegal activity.

366. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

367. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

368. There was no legitimate justification for Homolak's conduct harming Plaintiff.

369. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 5 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 6 - DEFAMATION
DEFENDANT HOMOLAK

370. Plaintiff incorporates by reference herein all preceding paragraphs.

371. When Homolak stated "Confusing kids and forcing sexual ideology and expression on them is child abuse" in reference to Plaintiff within Exhibit I, Homolak accused Plaintiff of sexual misconduct.

372. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

373. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

374. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

375. Homolak knew other third parties would hear her statements about Plaintiff because she posted them to Facebook.

376. Homolak's false accusations of misconduct attributed to Plaintiff were repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

377. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 6 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 6 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

378. Plaintiff incorporates by reference herein all preceding paragraphs.

379. When Homolak stated “Confusing kids and forcing sexual ideology and expression on them is child abuse” in Exhibit I, Homolak portrayed Plaintiff in a false light as a sexual predator.

380. In Exhibit I, Homolak specifically directed unwanted and uninvited attention to Plaintiff by placing Plaintiff at the forefront of Homolak’s anti-transgender activities before the public.

381. This statement cast Plaintiff in a false light publicly.

382. Homolak’s accusations of sexual misconduct attributed to Plaintiff were false.

383. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

384. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

385. Homolak’s false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

386. As a direct and proximate result of Homolak’s actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 6 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory

damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 6 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

387. Plaintiff incorporates by reference herein all preceding paragraphs.

388. When Homolak posted accusatory statements in Exhibit I, Homolak intentionally singled out Plaintiff to speak negatively of her.

389. Posting comments to social media is not inherently an illegal activity.

390. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

391. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

392. There was no legitimate justification for Homolak's actions harming Plaintiff.

393. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 6 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 7 - DEFAMATION

DEFENDANT HOMOLAK

394. Plaintiff incorporates by reference herein all preceding paragraphs.

395. When Homolak gave an interview with talk show host [REDACTED] on the [REDACTED] [REDACTED] in Exhibit J, Homolak accused Plaintiff of sexual misconduct by falsely accusing Plaintiff of sexually expressing herself in front of children through her clothing and further falsely claimed that Plaintiff is a pedophile.

396. As stated in Exhibit J, Homolak appeared on the talk show to discuss her campaign specifically against Plaintiff and Plaintiff's personal appearance while working at the Library.

397. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

398. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

399. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

400. Homolak knew other third parties would hear her statements about Plaintiff.

401. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

402. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy,

mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 7 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 7 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

403. Plaintiff incorporates by reference herein all preceding paragraphs.

404. When Homolak gave an interview with talk show host [REDACTED] on the [REDACTED] [REDACTED] in Exhibit J, Homolak made broad and sweeping derogatory statements about transgender persons generally and portrayed Plaintiff specifically in a false light as a sexual predator.

405. In Exhibit J, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

406. Homolak’s statements cast Plaintiff in a false light publicly.

407. Homolak’s accusations of sexual misconduct attributed to Plaintiff were false.

408. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

409. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

410. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

411. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 7 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

**SECOND ALTERNATE COUNT 7 - PRIMA FACIE TORT
DEFENDANT HOMOLAK**

412. Plaintiff incorporates by reference herein all preceding paragraphs.

413. When Homolak gave an interview with talk show host [REDACTED] on the [REDACTED] [REDACTED] in Exhibit J, Homolak intentionally singled out Plaintiff to speak negatively of her.

414. Speaking on a talk show is not inherently an illegal activity.

415. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

416. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

417. There was no legitimate justification for Homolak's activities harming Plaintiff.

418. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 7 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

**COUNT 8 - DEFAMATION
DEFENDANT HOMOLAK**

419. Plaintiff incorporates by reference herein all preceding paragraphs.

420. When Homolak posted Exhibits K and L on her St. Charles Library Mama Bear Facebook page, Homolak falsely accused Plaintiff of sexual misconduct by calling her a drag queen and repeating that Plaintiff was sexualizing herself before children.

421. Homolak specifically referred to Plaintiff by name in Exhibit L.

422. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

423. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

424. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

425. Homolak knew other third parties would hear her statements about Plaintiff because she posted these statements in a public Facebook group.

426. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

427. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 8 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 8 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

428. Plaintiff incorporates by reference herein all preceding paragraphs.

429. When Homolak posted Exhibits K and L on her St. Charles Library Mama Bear Facebook page, Homolak portrayed Plaintiff in a false light as a sexual predator by calling Plaintiff a drag librarian who needs a dress code to prevent her from dressing in a way that sexualizes children.

430. In Exhibits K and L, Homolak specifically directed unwanted and uninvited attention to Plaintiff by accusing her of sexual misconduct, directly using her name, and thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

431. This statement cast Plaintiff in a false light publicly.

432. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

433. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

434. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

435. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

436. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 8 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 8 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

437. Plaintiff incorporates by reference herein all preceding paragraphs.

438. When Homolak posted Exhibits K and L on her St. Charles Library Mama Bear Facebook page, Homolak intentionally singled out Plaintiff to speak negatively of her.

439. Posting on social media is not inherently an illegal activity.

440. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

441. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

442. There was no legitimate justification for Homolak's conduct harming Plaintiff.

443. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 8 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages,

compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 9 - DEFAMATION

DEFENDANT HOMOLAK

444. Plaintiff incorporates by reference herein all preceding paragraphs.

445. When Homolak presented at the SCCCC meeting on July 31, 2023, as shown in Exhibit M, Homolak falsely accused Plaintiff of sexual misconduct by calling her a sexual predator and stating Plaintiff is pushing her sexual agenda onto children.

446. Homolak specifically referred to Plaintiff by name and falsely attributed to Plaintiff the sexual misconduct.

447. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

448. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

449. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

450. Homolak knew other third parties would hear her statements about Plaintiff because there was a live audience, and she was aware of the meeting being recorded as evidenced by sharing a post of the meeting later.

451. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

452. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 9 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 9 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

453. Plaintiff incorporates by reference herein all preceding paragraphs.

454. When presented at the SCCCC meeting on July 31, 2023, as shown in Exhibit M, Homolak portrayed Plaintiff in a false light as a sexual predator.

455. In Exhibit M, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities.

456. This statement cast Plaintiff in a false light publicly.

457. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

458. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

459. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

460. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

461. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 9 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 9 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

462. Plaintiff incorporates by reference herein all preceding paragraphs.

463. When Homolak presented at the SCCCC meeting on July 31, 2023, as shown in Exhibit M, Homolak intentionally singled out Plaintiff to speak negatively of her.

464. Presenting at the SCCCC meeting is not inherently an illegal activity.

465. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

466. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

467. There was no legitimate justification for Homolak's conduct harming Plaintiff.

468. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 9 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 10 - DEFAMATION
DEFENDANT HOMOLAK

469. Plaintiff incorporates by reference herein all preceding paragraphs.

470. When Homolak reposted [REDACTED] post with Barrett's and her speeches from the SCCCC meeting in Exhibit O, Homolak further published false accusations of sexual misconduct which she attributed to Plaintiff through social media.

471. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

472. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

473. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

474. Homolak knew other third parties would hear her statements about Plaintiff because she posted the clip to a Facebook group.

475. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

476. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 10 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 10 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

477. Plaintiff incorporates by reference herein all preceding paragraphs.

478. When Homolak reposted [REDACTED]'s post with Barrett's and her speeches from the SCCCC meeting in Exhibit O, Homolak portrayed Plaintiff in a false light as a sexual predator.

479. In Exhibit O, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities.

480. Homolak's actions and statements cast Plaintiff in a false light publicly.

481. Homolak's and Barrett's accusations of sexual misconduct attributed to Plaintiff were false.

482. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

483. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

484. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

485. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 10 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally

against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 10 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

486. Plaintiff incorporates by reference herein all preceding paragraphs.

487. When Homolak reposted [REDACTED]'s post with Barrett's and her speeches from the SCCCC meeting in Exhibit O, Homolak intentionally singled out Plaintiff to speak negatively of her.

488. Posting and reposting on social media is not inherently illegal activity.

489. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

490. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

491. There was no legitimate justification for Homolak's conduct harming Plaintiff.

492. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 10 in the second alternates in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages,

compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 11 - DEFAMATION

DEFENDANT HOMOLAK

493. Plaintiff incorporates by reference herein all preceding paragraphs.

494. When Homolak reposted ██████'s post with Barrett's and her speeches from the SCCCC meeting to the Bluey Memes Facebook group in Exhibit P, Homolak accused Plaintiff of sexual misconduct by spreading her message calling Plaintiff a sexual predator further through social media.

495. The video clearly identifies the county and state in which the meeting took place, and further provides sufficient information from which Plaintiff can be identified as the target of said comments; Plaintiff was easy to identify because of the surge in news coverage surrounding her employment at the Library.

496. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

497. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

498. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

499. Homolak knew other third parties would hear her statements about Plaintiff because she posted the video to a group of over three hundred and four thousand people (304,000) from across the world.

500. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

501. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 11 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 11 - FALSE LIGHT – INVASION OF PRIVACY
DEFENDANT HOMOLAK

502. Plaintiff incorporates by reference herein all preceding paragraphs.

503. When Homolak reposted ██████'s post with Barrett's and her speeches from the SCCCC meeting to the Bluey Memes Facebook group in Exhibit P, Homolak made broad and sweeping derogatory statements about transgender persons generally and portrayed Plaintiff specifically in a false light as a sexual predator.

504. In Exhibit P, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the Facebook community and the general public at large.

505. This statement cast Plaintiff in a false light publicly.

506. Homolak falsely attributed sexual misconduct to Plaintiff by making general aspersions about LGBTQ+ persons as a group, but specifically implicating Plaintiff as a member of the group of persons whom Homolak alleged generally engage in such misconduct.

507. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

508. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

509. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

510. Homolak's false accusations of misconduct attributed to Plaintiff are highly objectively offensive to a reasonable person and further subjectively offensive to Plaintiff.

511. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 11 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally

against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 11 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

512. Plaintiff incorporates by reference herein all preceding paragraphs.

513. When Homolak reposted [REDACTED]'s post with Barrett's and her speeches from the SCCCC meeting to the Bluey Memes Facebook group in Exhibit P, Homolak intentionally singled out Plaintiff to speak negatively of her.

514. Posting and reposting other's content is not inherently an illegal activity.

515. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

516. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

517. There was no legitimate justification for Homolak's conduct harming Plaintiff.

518. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 11 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages,

compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 12 - DEFAMATION

DEFENDANT HOMOLAK

519. Plaintiff incorporates by reference herein all preceding paragraphs.

520. When Homolak spoke on GCSTL's Civic Engagement Panel in Exhibit S, Homolak accused Plaintiff of sexual misconduct by alleging Plaintiff indoctrinates and grooms children as a sexual predator.

521. Homolak specifically stated Plaintiff's name and the Library branch at which Plaintiff works.

522. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

523. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

524. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

525. Homolak knew other third parties would hear her statements about Plaintiff because she engaged in a public speaking event of which she knew would be recorded and posted to GCSTL's website.

526. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

527. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 12 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 12 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

528. Plaintiff incorporates by reference herein all preceding paragraphs.

529. When Homolak spoke on GCSTL's Civic Engagement Panel in Exhibit S, Homolak portrayed Plaintiff in a false light as a sexual predator.

530. In Exhibit S, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before others and the general public.

531. This statement cast Plaintiff in a false light publicly.

532. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

533. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

534. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

535. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

536. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 12 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 12 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

537. Plaintiff incorporates by reference herein all preceding paragraphs.

538. When Homolak spoke on GCSTL's Civic Engagement Panel in Exhibit S, Homolak intentionally singled out Plaintiff to speak negatively of her.

539. Speaking on GCSTL's panel is not inherently an illegal activity.

540. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

541. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

542. There was no justification for Homolak's conduct harming Plaintiff.

543. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 12 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 13 - DEFAMATION
DEFENDANT HOMOLAK

544. Plaintiff incorporates by reference herein all preceding paragraphs.

545. When Homolak appeared on the talk show [REDACTED] in Exhibit T, Homolak falsely accused Plaintiff of sexual misconduct by accusing Plaintiff of improper sexual behavior around children.

546. Homolak specifically called Plaintiff "Danny the Drag Librarian," clearly referring to Plaintiff by name.

547. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

548. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

549. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

550. Homolak knew other third parties would hear her statements about Plaintiff because she appeared on a broadcasted and recorded talk show.

551. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

552. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 13 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 13 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

553. Plaintiff incorporates by reference herein all preceding paragraphs.

554. When Homolak appeared on the talk show [REDACTED] in Exhibit T, Homolak portrayed Plaintiff in a false light as a sexual predator.

555. In Exhibit T, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

556. This statement cast Plaintiff in a false light publicly.

557. Homolak’s accusations of sexual misconduct attributed to Plaintiff were false.

558. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

559. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

560. Homolak’s false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

561. As a direct and proximate result of Homolak’s actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 13 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 13 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

562. Plaintiff incorporates by reference herein all preceding paragraphs.

563. When Homolak appeared on the talk show [REDACTED] in Exhibit T, Homolak intentionally singled out Plaintiff to speak negatively of her.

564. Appearing on a talk show is not inherently an illegal activity.

565. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

566. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

567. There was no legitimate justification for Homolak's conduct harming Plaintiff.

568. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 13 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages,

compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 14 - DEFAMATION

DEFENDANT HOMOLAK

569. Plaintiff incorporates by reference herein all preceding paragraphs.

570. When Homolak dispersed the flier in Exhibit U, Homolak falsely accused Plaintiff of sexual misconduct by claiming Plaintiff dressed as an over sexualized woman who is attempting to groom and sexualize young children.

571. The flier stated information about a library employee dressed in a gender nonconforming way, clearly talking about and providing enough information to make Plaintiff readily identifiable.

572. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

573. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

574. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

575. Homolak knew other third parties would read her statements about Plaintiff because she dispersed the fliers to the community.

576. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

577. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 14 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 14 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

578. Plaintiff incorporates by reference herein all preceding paragraphs.

579. When Homolak dispersed the flier in Exhibit U, Homolak made broad and sweeping derogatory statements about transgender persons generally and portrayed Plaintiff specifically in a false light as a sexual predator.

580. In Exhibit U, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

581. This statement cast Plaintiff in a false light publicly.

582. Homolak falsely attributed sexual misconduct to Plaintiff by making general aspersions about LGBTQ+ persons as a group, but specifically implicating Plaintiff as a member of the group of persons whom Homolak alleged generally engage in such misconduct.

583. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

584. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

585. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

586. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

587. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 14 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 14 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

588. Plaintiff incorporates by reference herein all preceding paragraphs.

589. When Homolak dispersed the flier in Exhibit U, Homolak intentionally singled out Plaintiff to speak negatively of her.

590. Passing out fliers and attending a rally is not inherently illegal activity.

591. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

592. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

593. There was no justification for Homolak's conduct harming Plaintiff.

594. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 15 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 15 - DEFAMATION

DEFENDANT HOMOLAK

595. Plaintiff incorporates by reference herein all preceding paragraphs.

596. When Homolak engaged in the comments on a post in the Bluey Memes Facebook group in Exhibit V, Homolak accused Plaintiff of sexual misconduct by claiming Plaintiff is a pedophile.

597. Homolak had previously disseminated information regarding Plaintiff in the Bluey Memes Facebook group and the interview Homolak posted previously in the group's comments also identifies Plaintiff specifically, therefor making it easy for a Bluey Memes group member to identify Plaintiff as to the topic of Homolak's later comments.

598. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

599. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

600. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

601. Homolak knew other third parties would read her statements about Plaintiff because she posted them in the comments of a large Facebook group.

602. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

603. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 15 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 15 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

604. Plaintiff incorporates by reference herein all preceding paragraphs.

605. When Homolak engaged in the comments on a post in the Bluey Memes Facebook group in Exhibit V, Homolak made broad and sweeping derogatory statements about transgender persons generally and portrayed Plaintiff specifically in a false light as a sexual predator.

606. In Exhibit V, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities on a public Facebook forum.

607. This statement cast Plaintiff in a false light publicly.

608. Homolak falsely attributed sexual misconduct to Plaintiff by making general aspersions about LGBTQ+ persons as a group, but specifically implicated Plaintiff as a

member of the group of persons whom Homolak alleged generally engage in such misconduct.

609. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

610. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

611. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

612. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

613. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 15 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 15 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

614. Plaintiff incorporates by reference herein all preceding paragraphs.

615. When Homolak made social media comments in Exhibit V, Homolak intentionally singled out Plaintiff to speak negatively of her.

616. Posting and commenting on posts on social media is not inherently illegal activity.

617. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

618. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

619. There was no legitimate justification for Homolak's conduct harming Plaintiff.

620. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 16 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 16 - DEFAMATION

DEFENDANT HOMOLAK

621. Plaintiff incorporates by reference herein all preceding paragraphs.

622. When Homolak posted Exhibit X to her St. Charles Library Mama Bear Facebook page, Homolak accused Plaintiff of sexual misconduct by accusing Plaintiff of terrorizing children as a sexual predator dressed in drag.

623. Homolak's title for the post specifically states this occurs every day at Plaintiff's branch of the Library.

624. Homolak's St. Charles Library Mama Bear Facebook page also references Plaintiff specifically numerous times, including where Plaintiff works, and a reasonable group member would know Plaintiff was the target of Exhibit W.

625. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

626. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

627. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

628. Homolak knew other third parties would read her statements about Plaintiff.

629. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

630. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 16 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 16 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

631. Plaintiff incorporates by reference herein all preceding paragraphs.

632. When Homolak posted Exhibit X to her St. Charles Library Mama Bear Facebook page, Homolak made broad and sweeping derogatory statements about transgender persons generally and portrayed Plaintiff in a false light as a sexual predator of children.

633. In Exhibit X, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

634. Homolak’s statements cast Plaintiff in a false light publicly.

635. Homolak falsely attributed sexual misconduct to Plaintiff by making general aspersions about LGBTQ+ persons as a group, but specifically implicating Plaintiff as a member of the group of persons whom Homolak alleged generally engage in such misconduct.

636. Homolak’s accusations of sexual misconduct attributed to Plaintiff were false.

637. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

638. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

639. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

640. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 16 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

**SECOND ALTERNATE COUNT 16 - PRIMA FACIE TORT
DEFENDANT HOMOLAK**

641. Plaintiff incorporates by reference herein all preceding paragraphs.

642. When Homolak posted in her St. Charles Library Mama Bear Facebook group as shown in Exhibit X, Homolak intentionally singled out Plaintiff to speak negatively of her.

643. Posting to social media is not inherently an illegal activity.

644. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

645. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

646. There was no legitimate justification for Homolak's conduct harming Plaintiff.

647. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 16 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 17 - DEFAMATION
DEFENDANT HOMOLAK

648. Plaintiff incorporates by reference herein all preceding paragraphs.

649. When Homolak appeared on the [REDACTED] in Exhibit Y, Homolak accused Plaintiff of sexual misconduct by calling Plaintiff a drag queen and stating that Plaintiff's mere presence at the Library exposed children to sexual inappropriateness.

650. Homolak provided sufficient information during the radio appearance from which Plaintiff was readily identifiable.

651. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

652. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

653. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

654. Homolak knew other third parties would hear her statements about Plaintiff because she appeared on a public radio show that she knew was recorded to be available later.

655. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

656. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 17 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 17 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

657. Plaintiff incorporates by reference herein all preceding paragraphs.

658. When Homolak appeared on the [REDACTED] in Exhibit Y, Homolak portrayed Plaintiff in a false light as a sexual predator.

659. In Exhibit Y, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

660. Homolak's statements cast Plaintiff in a false light publicly.

661. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

662. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

663. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

664. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

665. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 17 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages,

compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 17 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

666. Plaintiff incorporates by reference herein all preceding paragraphs.

667. When Homolak appeared on the [REDACTED] in Exhibit Y, Homolak intentionally singled out Plaintiff to speak negatively of her.

668. Speaking on a radio show is not inherently an illegal activity.

669. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

670. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

671. There was no legitimate justification for Homolak's conduct harming Plaintiff.

672. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 17 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 18 - DEFAMATION

DEFENDANT HOMOLAK

673. Plaintiff incorporates by reference herein all preceding paragraphs.

674. When [REDACTED] reran Homolak's interview from Exhibit Y in Exhibit Z, in which Homolak accused Plaintiff of sexual misconduct by calling Plaintiff a drag queen and stating that Plaintiff's presence at the Library exposed children to sexual inappropriateness, Homolak republished the interview by posting the link to the replay on her Facebook page.

675. Homolak further published the false allegations she previously made against Plaintiff an additional time.

676. In the republication of the radio program, Homolak referenced the drag queen working at the Library and provided sufficient information from which listeners could readily identify Plaintiff as the target of Homolak's false accusations.

677. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

678. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

679. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

680. Homolak knew other third parties would hear her statements about Plaintiff because she appeared on a public radio show that she knew was recorded to be available later.

681. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

682. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 18 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 18 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

683. Plaintiff incorporates by reference herein all preceding paragraphs.

684. When [REDACTED] k reran Homolak's interview from Exhibit Y in Exhibit Z, and Homolak further published the link for the rerun on her Facebook page, Homolak portrayed Plaintiff in a false light as a sexual predator.

685. In Exhibit Z, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

686. This statement cast Plaintiff in a false light publicly.

687. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

688. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

689. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

690. Homolak's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

691. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 18 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 18 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

692. Plaintiff incorporates by reference herein all preceding paragraphs.

693. When [REDACTED] reran Homolak's interview from Exhibit Y in Exhibit Z, the link for which Homolak posted on her Facebook page, Homolak again intentionally singled out Plaintiff to further published negative information about Plaintiff.

694. Speaking on a radio show and posting the link to a rerun of the show is not inherently an illegal activity.

695. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress by republishing the link to the rerun.

696. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

697. There was no legitimate justification for Homolak's conduct harming Plaintiff.

698. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 18 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 19 - DEFAMATION

DEFENDANT HOMOLAK

699. Plaintiff incorporates by reference herein all preceding paragraphs.

700. When Homolak appeared on [REDACTED] in Exhibit AA, Homolak accused Plaintiff of sexual misconduct by calling her a pedophile.

701. Homolak provided sufficient identifying information about Plaintiff such that a listener would clearly know Homolak was calling Plaintiff a pedophile.

702. Homolak's accusations of sexual misconduct attributed to Plaintiff were false.

703. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

704. Homolak either intended to harm Plaintiff through her conduct and/or engaged in such conduct with willful and reckless disregard for any damage her conduct would cause Plaintiff.

705. Homolak knew other third parties would hear her statements about Plaintiff because she appeared on a public radio show that she knew was recorded to be available later.

706. Homolak's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

707. As a direct and proximate result of Homolak's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 19 in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 19 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HOMOLAK

708. Plaintiff incorporates by reference herein all preceding paragraphs.

709. When Homolak appeared on [REDACTED] in Exhibit AA, Homolak portrayed Plaintiff in a false light as a sexual predator.

710. In Exhibit AA, Homolak specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

711. This statement cast Plaintiff in a false light publicly.

712. Homolak’s accusations of sexual misconduct attributed to Plaintiff were false.

713. Homolak either knew the allegations of sexual misconduct Homolak attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

714. Homolak either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

715. Homolak’s false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

716. As a direct and proximate result of Homolak’s actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 19 in the alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 19 - PRIMA FACIE TORT

DEFENDANT HOMOLAK

717. Plaintiff incorporates by reference herein all preceding paragraphs.

718. When Homolak appeared on [REDACTED] in Exhibit AA, Homolak intentionally singled out Plaintiff to speak negatively of her.

719. Appearing on the radio show is not inherently an illegal activity.

720. Homolak intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress through Homolak's conduct.

721. Homolak further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

722. There was no legitimate justification for Homolak's conduct harming Plaintiff.

723. As a direct and proximate result of Homolak's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 19 in the second alternate in favor of Plaintiff against Defendant Homolak individually as well as jointly and severally against any other Defendant with whom Homolak conspired, for economic damages,

compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 20 – DEFAMATION

DEFENDANT JW

724. Plaintiff incorporates by reference herein all preceding paragraphs.

725. When JW posted to Facebook Exhibit B, JW accused Plaintiff of sexual misconduct by saying Plaintiff was dressed in drag and implying that Plaintiff is a groomer.

726. Plaintiff was the only Library employee who could have been identified as the person Defendant references in their post.

727. JW’s accusations of sexual misconduct attributed to Plaintiff were false.

728. JW either knew the allegations of sexual misconduct attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

729. JW either intended to harm Plaintiff through their post and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

730. JW knew other third parties would read their statements about Plaintiff.

731. JW’s false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

732. As a direct and proximate result of JW’s actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental

anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 20 in favor of Plaintiff against Defendant JW individually as well as jointly and severally against any other Defendant with whom JW conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 20 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT JW

733. Plaintiff incorporates by reference herein all preceding paragraphs.

734. When JW posted to Facebook Exhibit B, JW portrayed Plaintiff in a false light as a sexual predator pushing her sexuality on children at the Library.

735. In Exhibit B, JW specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

736. This statement cast Plaintiff in a false light publicly.

737. JW’s accusations of sexual misconduct attributed to Plaintiff were false.

738. JW either knew the allegations of sexual misconduct JW attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

739. JW either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

740. JW's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

741. As a direct and proximate result of JW's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 20 in the alternate in favor of Plaintiff against Defendant JW individually as well as jointly and severally against any other Defendant with whom JW conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 20 - PRIMA FACIE TORT

DEFENDANT JW

742. Plaintiff incorporates by reference herein all preceding paragraphs.

743. When JW posted to Facebook Exhibit B, JW intentionally singled out Plaintiff to speak negatively of her.

744. Posting on social media is not inherently an illegal activity.

745. JW intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

746. JW further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

747. There was no legitimate justification for JW's conduct harming Plaintiff.

748. As a direct and proximate result of JW's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 20 in the second alternate in favor of Plaintiff against Defendant JW individually as well as jointly and severally against any other Defendant with whom JW conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 21 – DEFAMATION

DEFENDANT HAGEDORN

749. Plaintiff incorporates by reference herein all preceding paragraphs.

750. When Hagedorn presented at the SCCC meeting in Exhibit E, Hagedorn accused Plaintiff of sexual misconduct and child abuse by accusing her of sexually expressing herself in front of children at the Library.

751. Hagedorn's accusations of sexual misconduct and child abuse attributed to Plaintiff were false.

752. Hagedorn spoke directly after Homolak spoke at the meeting about Plaintiff; a reasonable listener would have clearly understood Hagedorn's false accusations were made about Plaintiff.

753. Hagedorn either knew the allegations of sexual misconduct Hagedorn attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

754. Hagedorn either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

755. Hagedorn knew, or reasonably should have known, other third parties would hear her statements about Plaintiff because she spoke at a publicly held, recorded meeting.

756. Hagedorn's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

757. As a direct and proximate result of Hagedorn's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 21 in favor of Plaintiff against Defendant Hagedorn individually as well as jointly and severally against any other Defendant with whom Hagedorn conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 1 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HAGEDORN

758. Plaintiff incorporates by reference herein all preceding paragraphs.

759. When Hagedorn presented at the SCCC meeting in Exhibit E, Hagedorn portrayed Plaintiff in a false light as a sexual predator.

760. In Exhibit E, Hagedorn specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

761. This statement cast Plaintiff in a false light.

762. Hagedorn's accusations of sexual misconduct attributed to Plaintiff were false.

763. Hagedorn either knew the allegations of sexual misconduct Hagedorn attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

764. Hagedorn either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

765. Hagedorn false accusations of misconduct attributed to Plaintiff are highly offensive to an objective reasonable person and further subjectively offensive to Plaintiff.

766. As a direct and proximate result of Hagedorn actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 21 in the alternate in favor of Plaintiff against Defendant Hagedorn individually as well as jointly and severally against any other Defendant with whom Hagedorn conspired, for economic damages,

compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 21 - PRIMA FACIE TORT

DEFENDANT HAGEDORN

767. Plaintiff incorporates by reference herein all preceding paragraphs.

768. When Hagedorn presented at the SCCC meeting in Exhibit E, Hagedorn intentionally singled out Plaintiff to speak negatively of her.

769. Speaking at the SCCC meeting is not inherently an illegal activity.

770. Hagedorn intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

771. Hagedorn further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

772. There was no legitimate justification for Hagedorn's conduct harming Plaintiff.

773. As a direct and proximate result of Hagedorn's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 21 in the second alternate in favor of Plaintiff against Defendant Hagedorn individually as well as jointly and severally against any other Defendant with whom Hagedorn conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 22 - DEFAMATION

DEFENDANT HAGEDORN

774. Plaintiff incorporates by reference herein all preceding paragraphs.

775. When Hagedorn spoke at the June 20, 2023, Library Board Meeting as shown in Exhibit H, Hagedorn accused Plaintiff of sexual misconduct by claiming Plaintiff sexually expresses herself in front of children and further stated Plaintiff's presence in the Library is psychologically abusive to children.

776. Hagedorn's accusations of sexual misconduct and psychological abuse of children attributed to Plaintiff were false.

777. Hagedorn either knew the allegations of sexual misconduct Hagedorn attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

778. Hagedorn either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

779. Hagedorn knew other third parties would hear her statements about Plaintiff because she presented to a group of at least three hundred and fifty (350) people, and the meeting was recorded and posted online.

780. Hagedorn's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

781. As a direct and proximate result of Hagedorn's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy,

mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 22 in favor of Plaintiff against Defendant Hagedorn individually as well as jointly and severally against any other Defendant with whom Hagedorn conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 2 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT HAGEDORN

782. Plaintiff incorporates by reference herein all preceding paragraphs.

783. When Hagedorn spoke at the June 20, 2023, Library Board Meeting as shown in Exhibit H, Hagedorn portrayed Plaintiff in a false light as a sexual predator.

784. In Exhibit H, Hagedorn specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

785. This statement cast Plaintiff in a false light publicly.

786. Hagedorn’s accusations of sexual misconduct attributed to Plaintiff were false.

787. Hagedorn either knew the allegations of sexual misconduct Hagedorn attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

788. Hagedorn either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

789. Hagedorn's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

790. As a direct and proximate result of Hagedorn's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 22 in the alternate in favor of Plaintiff against Defendant Hagedorn individually as well as jointly and severally against any other Defendant with whom Hagedorn conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 2 - PRIMA FACIE TORT

DEFENDANT HAGEDORN

791. Plaintiff incorporates by reference herein all preceding paragraphs.

792. When Hagedorn spoke at the June 20, 2023, Library Board Meeting as shown in Exhibit H, Hagedorn intentionally singled out Plaintiff to speak negatively of her.

793. Speaking at the SCCC meeting is not inherently an illegal activity.

794. Hagedorn intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

795. Hagedorn further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

796. There was no legitimate justification for Hagedorn's conduct harming Plaintiff.

797. As a direct and proximate result of Hagedorn's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 22 in the second alternate in favor of Plaintiff against Defendant Hagedorn individually as well as jointly and severally against any other Defendant with whom Hagedorn conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 23 – DEFAMATION

DEFENDANT GRACE CHURCH ST. LOUIS

798. Plaintiff incorporates by reference herein all preceding paragraphs.

799. When GCSTL posted to Facebook Exhibit G, GCSTL accused Plaintiff of sexual misconduct by direct implication that Plaintiff engaged in drag as sexual expression and therefore children needed protection from Plaintiff as a dangerous person.

800. Exhibit G clearly targeted Plaintiff as Defendant Homolak had already created a community panic over Plaintiff and Plaintiff's employment and presence at the Library.

801. GCSTL's accusations of sexual misconduct and exposing children to sexual expression attributed to Plaintiff were false.

802. GCSTL either knew the allegations of sexual misconduct GCSTL attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

803. GCSTL either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

804. GCSTL knew other third parties would see its statements about Plaintiff because the post was public on Facebook.

805. GCSTL's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

806. As a direct and proximate result of GCSTL's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 23 in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre-judgment and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 23 - FALSE LIGHT - INVASION OF PRIVACY

DEFENDANT GCSTL

807. Plaintiff incorporates by reference herein all preceding paragraphs.

808. When GCSTL posted to Facebook Exhibit G, GCSTL portrayed Plaintiff in a false light as a sexual predator.

809. In Exhibit G, GCSTL specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

810. GCSTL's statements cast Plaintiff in a false light publicly.

811. GCSTL's accusations of sexual misconduct attributed to Plaintiff were false.

812. GCSTL either knew the allegations of sexual misconduct GCSTL attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

813. GCSTL either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

814. GCSTL's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

815. As a direct and proximate result of GCSTL's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 23 in the alternate in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 23 - PRIMA FACIE TORT

DEFENDANT GCSTL

816. Plaintiff incorporates by reference herein all preceding paragraphs.

817. When GCSTL posted to Facebook Exhibit G, GCSTL intentionally singled out Plaintiff to speak negatively of her.

818. Posting on social media is not inherently an illegal activity.

819. GCSTL intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

820. CGSTL further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

821. There was no legitimate justification for GCSTL's conduct harming Plaintiff.

822. As a direct and proximate result of GCSTL's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 23 in the second alternate in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 24 - DEFAMATION

DEFENDANT GCSTL

823. Plaintiff incorporates by reference herein all preceding paragraphs.

824. When GCSTL made a blog post on August 2023 Civic Engagement Meeting in Exhibit R, GCSTL accused Plaintiff of sexual misconduct by posting its agenda, which included opposing the sexual grooming of preadolescent children and further included Defendant Homolak's anti-transgender civic engagement activities against Plaintiff as an example of opposing such grooming.

825. GCSTL's accusations of sexual misconduct attributed to Plaintiff were false.

826. The statement regarding sexual grooming of preadolescent children is readily identifiable as about Plaintiff because the only speaker who addressed grooming of children was Homolak, who directly referenced Plaintiff.

827. GCSTL either knew the allegations of sexual misconduct GCSTL attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

828. GCSTL either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

829. GCSTL knew other third parties would hear the statements about Plaintiff because it posted the blog post to their public website for anyone to read.

830. GCSTL's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

831. As a direct and proximate result of GCSTL's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 24 in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 24 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT GCSTL

832. Plaintiff incorporates by reference herein all preceding paragraphs.

833. When GCSTL made a blog post on August 2023 Civic Engagement Meeting in Exhibit R, GCSTL made, endorsed, and further portrayed Plaintiff in a false light as a sexual predator.

834. In Exhibit R, GCSTL specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

835. This statement cast Plaintiff in a false light publicly.

836. GCSTL accusations of sexual misconduct attributed to Plaintiff were false.

837. GCSTL either knew the allegations of sexual misconduct GCSTL attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

838. GCSTL either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

839. GCSTL's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

840. As a direct and proximate result of GCSTL's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 24 in the alternate in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

**SECOND ALTERNATE COUNT 24 - PRIMA FACIE TORT
DEFENDANT GCSTL**

841. Plaintiff incorporates by reference herein all preceding paragraphs.

842. When GCSTL posted a blog post on August 2023 Civic Engagement Meeting in Exhibit R, GCSTL intentionally singled out Plaintiff to speak negatively of her.

843. Posting a blog is not inherently an illegal activity.

844. GCSTL intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

845. CGSTL further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

846. There was no legitimate justification for GCSTL's conduct harming Plaintiff.

847. As a direct and proximate result of GCSTL's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 24 in the second alternate in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 25 - DEFAMATION

DEFENDANT GCSTL

848. Plaintiff incorporates by reference herein all preceding paragraphs.

849. When GCSTL held and then publicly posted a recording of their August 2023 Civic Engagement Meeting attached as Exhibit S, GCSTL accused Plaintiff of sexual misconduct by endorsing, ratifying, and acquiescing in Homolak's false accusations that Plaintiff engaged in indoctrinating and grooming children for sexual purposes.

850. GCSTL repeated Homolak's false accusations when it published a recording of the August 2023 Civic Engagement Meeting in which Homolak falsely accused Plaintiff by name of sexual misconduct.

851. GCSTL's accusations of sexual misconduct attributed to Plaintiff were false.

852. GCSTL either knew the allegations of sexual misconduct GCSTL attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

853. GCSTL either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

854. GCSTL knew other third parties would hear the statements about Plaintiff because it held a public event that was recorded and subsequently posted to their website publicly accessible website and to soundcloud.

855. GCSTL's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

856. As a direct and proximate result of GCSTL's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 25 in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 25 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT GCSTL

857. Plaintiff incorporates by reference herein all preceding paragraphs.

858. When GCSTL held and then posted a recording of their August 2023 Civic Engagement Meeting in Exhibit S, GCSTL made, endorsed, and further portrayed Plaintiff in a false light as a sexual predator.

859. In Exhibit S, GCSTL specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

860. This statement cast Plaintiff in a false light publicly.

861. GCSTL accusations of sexual misconduct attributed to Plaintiff were false.

862. GCSTL either knew the allegations of sexual misconduct GCSTL attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

863. GCSTL either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

864. GCSTL’s false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

865. As a direct and proximate result of GCSTL’s actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 25 in the alternate in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 25 - PRIMA FACIE TORT

DEFENDANT GCSTL

866. Plaintiff incorporates by reference herein all preceding paragraphs.

867. When GCSTL held and subsequently posted a recording of their August 2023 Civic Engagement Meeting in Exhibit S, GCSTL intentionally singled out Plaintiff to speak negatively of her.

868. Hosting a meeting and posting a recording of the meeting on a public facing website is not inherently an illegal activity.

869. GCSTL intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress when it published the recording of its August 2023 Civic Engagement Meeting.

870. GCSTL further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

871. There was no legitimate justification for GCSTL's conduct harming Plaintiff.

872. As a direct and proximate result of GCSTL's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 25 in the second alternate in favor of Plaintiff against Defendant GCSTL individually as well as jointly and severally against any other Defendant with whom GCSTL conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 26 – DEFAMATION

DEFENDANT PUSZKAR

873. Plaintiff incorporates by reference herein all preceding paragraphs.

874. When Puszkar spoke at the June 20, 2023, Library Board meeting as shown in Exhibit H, Puszkar accused Plaintiff of sexual misconduct by referring to Plaintiff as a transvestite and claiming Plaintiff's purpose of working at the Library is to indoctrinate and to gain access to children for sexual purposes.

875. Puszkar's accusations of sexual misconduct attributed to Plaintiff were false.

876. Puszkar either knew the allegations of sexual misconduct Puszkar attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

877. Puszkar either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

878. Puszkar knew other third parties would hear her statements about Plaintiff because she presented to a group of at least three hundred and fifty (350) people, and the meeting was recorded and posted online.

879. Puszkar's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

880. Puszkar, who is also a school board member of the [REDACTED], was not appearing at the Library Board meeting in any official capacity but was appearing as an individual private citizen.

881. Any alleged official immunity Puszkar may assert does not apply in the present case because Puszkar appeared and made comment as a private citizen and/or waived any immunity by her intentional, malicious conduct towards Plaintiff, which was intended to harm Plaintiff as a transgender person.

882. As a direct and proximate result of Puszkar's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 26 in favor of Plaintiff against Defendant Puszkar individually as well as jointly and severally against any other Defendant with whom Puszkar conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 26 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT PUSZKAR

883. Plaintiff incorporates by reference herein all preceding paragraphs.

884. When Puszkar spoke at the June 20, 2023, Library Board meeting as shown in Exhibit H, Puszkar portrayed Plaintiff in a false light as a sexual predator.

885. In Exhibit H, Puszkar specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak's anti-transgender community engagement activities before the public.

886. This statement cast Plaintiff in a false light publicly.

887. Puszkar's accusations of sexual misconduct attributed to Plaintiff were false.

888. Puszkar either knew the allegations of sexual misconduct Puszkar attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

889. Puszkar either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

890. Puszkar's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

891. As a direct and proximate result of Puszkar's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

892. Puszkar, who is also a school board member of the Francis Howell School District, was not appearing at the Library Board meeting in any official capacity but was appearing as an individual private citizen.

893. Any alleged official immunity Puszkar may assert does not apply in the present case because Puszkar appeared and made comment as a private citizen and/or waived any immunity by her intentional, malicious conduct towards Plaintiff, which was intended to harm Plaintiff as a transgender person.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 26 in the alternate in favor of Plaintiff against Defendant Puszkar individually as well as jointly and severally against any other Defendant with whom Puszkar conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 26 - PRIMA FACIE TORT

DEFENDANT PUSZKAR

894. Plaintiff incorporates by reference herein all preceding paragraphs.

895. When Puszkar spoke at the June 20, 2023, Library Board meeting as shown in Exhibit H, Puszkar intentionally singled out Plaintiff to speak negatively of her.

896. Speaking at the Library Board meeting is not inherently an illegal activity.

897. Puszkar intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress, and further acted with malice towards Plaintiff as a transgender person.

898. Puszkar further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

899. There was no legitimate justification for Puszkar's conduct harming Plaintiff.

900. As a direct and proximate result of Puszkar's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy,

mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

901. Puszkar, who is also a school board member of the [REDACTED] was not appearing at the Library Board meeting in any official capacity but was appearing as an individual private citizen.

902. Any alleged official immunity Puszkar may assert does not apply in the present case because Puszkar appeared and made comment as a private citizen and/or waived any immunity by her intentional, malicious conduct towards Plaintiff, which was intended to harm Plaintiff as a transgender person.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 26 in the second alternate in favor of Plaintiff against Defendant Puszkar individually as well as jointly and severally against any other Defendant with whom Puszkar conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

DEFENDANT CHRIS BARRETT
COUNT 27 – DEFAMATION

903. Plaintiff incorporates by reference herein all preceding paragraphs.

904. When Barrett presented at the SCCCC meeting on July 31, 2023, as shown in Exhibit M, Barrett accused Plaintiff of sexual misconduct by accusing Plaintiff of sexualizing children.

905. Barrett appeared with Homolak to speak and clearly referred to Plaintiff who was the center of the dress code debate, when accusing Plaintiff of sexualizing children.

906. Barrett's accusations of sexual misconduct attributed to Plaintiff were false.

907. Barrett either knew the allegations of sexual misconduct Barrett attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

908. Barrett either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

909. Barrett knew other third parties would hear his statements about Plaintiff because there was a live audience, and he was aware of the meeting being recorded as evidenced by [REDACTED] later posting a clip of Barrett speaking.

910. Barrett's false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

911. As a direct and proximate result of Barrett's actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 27 in favor of Plaintiff against Defendant Barrett individually as well as jointly and severally against any other Defendant with whom Barrett conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 27 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT BARRETT

912. Plaintiff incorporates by reference herein all preceding paragraphs.

913. When Barrett presented at the SCCCC meeting on July 31, 2023, as shown in Exhibit M, Barrett portrayed Plaintiff in a false light as a sexual predator.

914. In Exhibit M, Barrett specifically directed unwanted and uninvited attention to Plaintiff by accusing her of sexual misconduct by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

915. This statement cast Plaintiff in a false light publicly.

916. Barrett’s accusations of sexual misconduct attributed to Plaintiff were false.

917. Barrett either knew the allegations of sexual misconduct Barrett attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

918. Barrett either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

919. Barrett’s false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

920. As a direct and proximate result of Barrett’s actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 27 in the alternate in favor of Plaintiff against Defendant Barrett individually as well as jointly and severally against any other Defendant with whom Barrett conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 27 - PRIMA FACIE TORT

DEFENDANT BARRETT

921. Plaintiff incorporates by reference herein all preceding paragraphs.

922. When Barrett presented at the SCCCC meeting on July 31, 2023, as shown in Exhibit M, Barrett intentionally singled out Plaintiff to speak negatively of her.

923. Speaking at the SCCCC meeting is not inherently an illegal activity.

924. Barrett intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

925. Barrett further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

926. There was no legitimate justification for Barrett's conduct harming Plaintiff.

927. As a direct and proximate result of Barrett's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 27 in the second alternate in favor of Plaintiff against Defendant Barrett individually as well as jointly and severally against any other Defendant with whom Barrett conspired, for economic damages, compensatory

damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 28 - DEFAMATION

DEFENDANT BARRETT

928. Plaintiff incorporates by reference herein all preceding paragraphs.

929. When Barrett posted his speech from the SCCCC meeting in Exhibit N, Barrett accused Plaintiff of sexual misconduct by stating Plaintiff is a pervert and going after children.

930. Barrett's post is identifiably about Plaintiff because the content of the post is about the SCCC meeting where Barrett and Homolak spoke against Plaintiff, even using Plaintiff's name and the moniker "drag librarian," which Homolak had previously used frequently and openly when referring to Plaintiff.

931. Barrett's accusations of sexual misconduct attributed to Plaintiff were false.

932. Barrett either knew the allegations of sexual misconduct Barrett attributed to Plaintiff was false and/or made such statements with willful and reckless disregard for the truth.

933. Barrett either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

934. Barrett knew other third parties would see his statements about Plaintiff because he posted the information to Facebook.

935. Barrett’s false accusations of misconduct attributed to Plaintiff are repugnant, objectively offensive to any reasonable person, and further subjectively offensive to Plaintiff.

936. As a direct and proximate result of Barrett’s actions, Plaintiff has suffered damage through public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 28 in favor of Plaintiff against Defendant Barrett individually as well as jointly and severally against any other Defendant with whom Barrett conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

ALTERNATE COUNT 28 - FALSE LIGHT – INVASION OF PRIVACY

DEFENDANT BARRETT

937. Plaintiff incorporates by reference herein all preceding paragraphs.

938. When Barrett posted his speech from the SCCCC meeting in Exhibit N, Barrett portrayed Plaintiff in a false light as a sexual predator.

939. In Exhibit N, Barrett specifically directed unwanted and uninvited attention to Plaintiff by thrusting Plaintiff to the forefront of Homolak’s anti-transgender community engagement activities before the public.

940. This statement cast Plaintiff in a false light publicly.

941. Barrett’s accusations of sexual misconduct attributed to Plaintiff were false.

942. Barrett either knew the allegations of sexual misconduct Barrett attributed to Plaintiff were false and/or made such statements with willful and reckless disregard for the truth.

943. Barrett either intended to harm Plaintiff through their conduct and/or engaged in such conduct with willful and reckless disregard for any damage their conduct would cause Plaintiff.

944. Barrett's false accusations of misconduct attributed to Plaintiff are highly offensive to an objectively reasonable person and further subjectively offensive to Plaintiff.

945. As a direct and proximate result of Barrett's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 28 in the alternate in favor of Plaintiff against Defendant Barrett individually as well as jointly and severally against any other Defendant with whom Barrett conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

SECOND ALTERNATE COUNT 28 - PRIMA FACIE TORT

DEFENDANT BARRETT

946. Plaintiff incorporates by reference herein all preceding paragraphs.

947. When Barrett posted his speech from the SCCCC meeting in Exhibit N, Barrett intentionally singled out Plaintiff to speak negatively of her.

948. Posting to social media is not inherently an illegal activity.

949. Barrett intended to cause injury to Plaintiff by damaging her reputation and causing her emotional distress.

950. Barrett further intended to cause injury to Plaintiff by impeding or interfering with Plaintiff's employment with the Library.

951. There was no legitimate justification for Barrett's conduct harming Plaintiff.

952. As a direct and proximate result of Barrett's actions, Plaintiff has been damaged and suffered public humiliation, embarrassment, degradation, invasion of her privacy, mental anguish, pain and suffering, loss of enjoyment of life, loss of self-esteem, interference with her employment, and general emotional distress.

WHEREFORE, Plaintiff prays this Court enter its judgment on Count 28 in the second alternate in favor of Plaintiff against Defendant Barrett individually as well as jointly and severally against any other Defendant with whom Barrett conspired, for economic damages, compensatory damages, for pre- and post-judgment interest as allowed by law, and for such other and further legal and equitable relief as this Court deems just and proper.

COUNT 29 – CIVIL CONSPIRACY

DEFENDANTS HOMOLAK, PUSZKAR & GRACE CHURCH STL

953. Plaintiff re-alleges and incorporates herein by reference, as though fully set forth herein, all of the above numbered paragraphs.

954. Defendants Homolak and Puszkar were members of GCSTL's congregation at all times relevant to this Petition for Damages.

955. Defendant GCSTL encouraged, supported, perpetuated, promoted, and ratified the conduct of Defendants Homolak and Puszkar when Homolak and Puszkar defamed

Plaintiff, cast Plaintiff in a false light, and/or otherwise intentionally or recklessly harmed Plaintiff without legitimate justification when they made Plaintiff the target of their anti-transgender community engagement activities.

956. Defendants Homolak and Puszkas attended multiple sermons and Civic Engagement Meetings held by GCSTL in which GCSTL specifically called upon its congregants, including Homolak and Puszkas, to openly oppose, attack, combat, and engage in active and open hostile discrimination against transgender persons, including Plaintiff.

957. Defendants actively supported each other's hostile activities against Plaintiff as evidenced by shared social media posts, reposts, and posts in support for each other's activities,

958. Defendants actively encouraged others to join in the hostile and harmful civic engagement activities targeting Plaintiff.

959. During the August Civic Engagement meeting hosted by Defendant GCSTL, the panel moderator told listeners that if they are planning to speak at a local governmental meeting to let Defendant GCSTL's representatives know because they would help gather a group to go and support them.

960. Multiple speakers from the August Civic Engagement meeting stated that it was common to see Defendant GCSTL's members in the audience and that helped give them the confidence to go up and speak.

961. Defendant GCSTL used its influence over church members to raise the number of people who supported Defendant Homolak in her public attacks and smear campaign against Plaintiff.

962. The June Library Board meeting was highly detrimental and damaging to Plaintiff.

963. Multiple speakers used their three-minute public comment time to berate, degrade, and threaten Plaintiff at the behest of Defendants.

964. After watching the meeting, Plaintiff felt feared for her safety.

965. Plaintiff's reputation was also damaged. Her career is working in a library and at this meeting people, many of whom never met or seen Plaintiff, accused her of being dangerous to children, abusing children, and engaging in sexual misconduct.

966. Because all these comments relate to Plaintiff and to Plaintiff's employment, her professional reputation in the community was severely damaged by the comments made during the June Library Board meeting and beyond.

967. GCSTL not only ratified and condoned the acts of congregants Homolak and Puszkar, but aided, abetted, and supported them, and further encouraged other church members to support their efforts.

968. Homolak and Puszkar engaged in campaigns to discriminate against, harass, defame, embarrass, and humiliate transgender persons because of their sex without regard for the rights and privacy of others generally, and including Plaintiff specifically.

969. Defendants conspired and had a unity of purpose or common design and understanding in their targeting of transgender individuals, and Plaintiff especially in their defamatory, invasive, and unjustifiable hostile civic engagement activities.

970. As a direct result of Defendants' conduct whether unlawful or alternately lawful but with a hostile and harmful purpose to damage Plaintiff, as set forth herein, Plaintiff has suffered damages which include mental anguish, emotional distress, mental distress in the

form of embarrassment, degradation, humiliation, anxiety, loss of enjoyment of life, loss of sleep, and other nonpecuniary losses, all of a continuing and permanent nature.

971. The conduct of Defendants was outrageous and evidenced an evil motive or reckless indifference for the rights of Plaintiff and the rights of others.

WHEREFORE, Plaintiff prays for judgment against Defendants jointly and severally on Count 29 for actual and compensatory damages, all costs and expenses incurred herein, for appropriate equitable relief, for interest at the highest lawful rate, and for such other relief as the Court deems just and proper.

COUNT 30 – CIVIL CONSPIRACY

DEFENDANTS HOMOLAK & BARRETT

972. Plaintiff re-alleges and incorporates herein by reference, as though fully set forth herein, all of the above numbered paragraphs.

973. Defendants Homolak and Barrett shared a unity of purpose, common design and understanding, or a meeting of minds in an unlawful or alternately lawful but intentionally and unjustifiably harmful arrangement when Homolak recruited Barrett to stand with her and speak in support of Homolak's hostile, harmful, civic engagement activities.

974. Homolak and Barrett sat together, spoke directly after one another, recorded each other and shared social media posts about their own and each other's speeches.

975. Their goal was to state falsehoods about Plaintiff, defame Plaintiff, and further their personal anti-transgender agenda by using Plaintiff as an unwilling tool.

976. Defendant Barrett traveled to St. Charles specifically to attend the meeting at the invitation of Homolak.

977. Defendant Homolak and Barret’s social media presence after the July meeting show also shows they were working and conspiring together around the July meeting.

978. Defendant Barrett specifically stated he and Defendant Homolak spoke against Plaintiff working in the Library at the July meeting.

979. Defendant Homolak stated she was “glad to have [REDACTED] on board.”

980. Defendant Homolak and Barrett’s involvement at the July SCCC meeting was highly publicized through their media channels.

981. Defendants’ statements caused further damage to Plaintiff’s reputation.

982. As a direct result of the unlawful conduct of Defendants, as set forth herein, Plaintiff has suffered damages which include mental anguish, emotional distress, mental distress in the form of embarrassment, degradation, humiliation, anxiety, loss of enjoyment of life, loss of sleep, and other nonpecuniary losses, all of a continuing and permanent nature.

983. The conduct of Defendant was outrageous and evidenced an evil motive or reckless indifference for the rights of Plaintiff and the rights of others.

WHEREFORE, Plaintiff prays for judgment against Defendants jointly and severally on Count 30 for actual and compensatory damages, all costs and expenses incurred herein, for any appropriate equitable relief, for interest at the highest lawful rate, and for such other relief as the Court deems just and proper.

Demand for Jury Trial

Plaintiff requests a trial by jury, in the Circuit Court of St. Charles County, Missouri on all counts and allegations of wrongful conduct alleged in this Petition.

Respectfully Submitted,

MISSOURI KANSAS QUEER LAW

/s/ Mary Madeline Johnson

/s/ Alexis Pearson

Mary Madeline Johnson, Mo. Bar # 57716

Alexis M. Pearson, Mo. Bar # 73894

220 Main Street, Ste. 201

Platte City, Missouri 64079

Tel: (816) 607-1836

madeline@mokanqueerlaw.com

alex@mokanqueerlaw.com

ATTORNEYS FOR PLAINTIFF

Not an Official Court Document