




IN THE CIRCUIT COURT OF ST. CHARLES COUNTY
STATE OF MISSOURI

JUSTIN HICKS,)	
)	Case No.:
Plaintiff,)	
)	Division:
v.)	
)	
MAX CALFO,)	
Serve at:)	
)	
)	
MISSOURIANS FOR MAX CALFO,)	
Serve at:)	
)	
)	
LINDI WILLIFORD)	
Serve at:)	
)	
)	
Defendants,)	

Petition

COMES NOW, the Plaintiff Justin Hicks (hereinafter “Plaintiff”) and for his cause of action against Defendants Max Calfo (hereinafter “Max”), Missourians for Max Calfo (hereinafter “MMC”), and Lindi Williford (hereinafter “Lindi”) (collectively the “Defendants”) and for his cause of action against Defendants states as follows:

Parties, Jurisdiction, and Venue

1. Plaintiff is a resident of St. Charles County, Missouri.
2. Max is a resident of St. Charles County, Missouri.

3. MMC is a Candidate Committee registered with the Missouri Ethics Commission with an MECID of [REDACTED], with a registered address in St. Charles County, Missouri (See Exhibit 5).
4. Lindi is the Treasurer for MMC as listed with the Missouri Ethics Commission, and a resident of St. Charles County, Missouri (See Exhibit 5).
5. Jurisdiction is proper before this Court.
6. Venue is proper in this Court.

Background

7. According to popular lore, on a hot and steamy summer day in Philadelphia, Pennsylvania, our Founding Fathers were locked in Constitution Hall debating, among other issues of historic importance, what form of government our fledgling Nation may adopt, Benjamin Franklin emerged from the front gates. When asked by a humble old woman in the crowd how our land was to be governed, Poor Richard himself opined, “a Republic, ma’am...if you can keep it.”
8. While we may never know the tone and tenor of that fateful meeting of minds nearly three centuries ago, it requires no imagination to say it looked nothing like the at times absurdity of what passes for modern political discourse.
9. At its core, that is what this Petition is about. At what point is a line drawn to say we have gone too far? What role does the rule of law play in our ever-increasing race to the bottom? Is there ever again going to be a time where we look at where we are and ask, in the immortal words of Joseph Welch, “have you no decency, sir?”

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

39. Plaintiff has been damaged by the actions of Defendants, by their flagrant disregard for the Rule of Law, and their disgraceful conduct masquerading as political discourse.

WHEREFORE, Plaintiff prays that this Court enter a judgment in his favor and against Defendants for an amount adequately and justly compensate Plaintiff, together with his costs and attorney's fees herein incurred and expended, along with any other relief this Court deems just and proper under the circumstances.

Respectfully Submitted,

KIELTY LAW OFFICES, LLC

/s/ Jonathan R. Lerman

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CERTIFICATE OF SERVICE

A copy of the foregoing was sent via EFile on this 29th day of September, 2023 to the Circuit Clerk, along with all attorneys of record therewith.

/s/ Jonathan R. Lerman
