

IN THE CIRCUIT COURT OF THE CITY OF SAINT LOUIS
STATE OF MISSOURI

AMY HARMS,)	
)	
Plaintiff,)	
)	Cause No.
v.)	
)	Division
STEVEN ROBERTS, JR.,)	
)	
Serve at:)	
Missouri House of Representatives)	
201 W. Capitol Ave., Rm. 109-H)	
Jefferson City, MO 65101,)	
)	
Defendant.)	

PETITION

COMES NOW Plaintiff, Amy Harms, and for her Petition, states as follows:

THE PARTIES

1. Plaintiff is an individual who resides in the City of Saint Louis, State of Missouri.
2. Plaintiff is twenty-eight years old.
3. Defendant, Steven Roberts, Jr., is an individual who resides in the City of Saint Louis, State of Missouri.
4. Defendant is twenty-nine years old.

JURISDICTION AND VENUE

5. Plaintiff was first injured by Defendant in the City of Saint Louis, Missouri.
6. Jurisdiction and venue are, therefore, proper in the City of Saint Louis, pursuant to Section 508.010.4, RSMo.

ASSAULT

7. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 through 6 herein.

8. On April 16, 2015, at approximately 10:00 PM, Defendant arrived at the SideBar, a bar located at 1317 Washington Avenue, Saint Louis, Missouri, at the time of the incident.
9. On April 16, 2015, at approximately 10:00 PM, Plaintiff was already at the SideBar.
10. At the time, Plaintiff was sitting alone at a table.
11. After Defendant arrived, Defendant took a seat at the table where Plaintiff was seated.
12. Plaintiff and Defendant spoke to one another while at the SideBar.
13. Plaintiff stated to Defendant that she was not interested in Defendant.
14. Later, Defendant moved his seat at the table where Plaintiff and Defendant were sitting.
15. Defendant moved his seat beside Plaintiff.
16. After Defendant moved his seat beside Plaintiff, Plaintiff was confined between the physical barriers of a wall, a table with another person sitting on the opposite side, Defendant seated directly beside Plaintiff, and another person seated directly behind Plaintiff.
17. Defendant placed his hand on the inside of Plaintiff's right knee.
18. Plaintiff was afraid that Defendant's contact would continue and that further contact would occur.
19. Defendant then proceeded to massage the inside of Plaintiff's right thigh, moving up Plaintiff's leg.
20. Defendant then moved his hand over Plaintiff's genitals over Plaintiff's clothing.
21. Thereafter, Defendant rubbed his hand up and down over Plaintiff's genitals over Plaintiff's clothing.
22. Defendant then stuck his hand inside of Plaintiff's pants and underwear.
23. Defendant's hand made contact with Plaintiff's genitals.
24. Plaintiff then turned in her chair and faced the wall.
25. Plaintiff could not relocate herself elsewhere due to confinement by physical barrier.

26. Defendant's hand was dislodged from inside of Plaintiff's pants and underwear when Plaintiff turned in her chair.
27. Defendant then moved in closer to Plaintiff.
28. Defendant then placed his hand on the inside of Plaintiff's right leg.
29. Defendant attempted to pull Plaintiff or Plaintiff's leg toward him.
30. Plaintiff held onto the table.
31. Defendant was unable to pull Plaintiff or Plaintiff's leg toward him.
32. Defendant once again stuck his hand inside of Plaintiff's pants and underwear.
33. Defendant's hand once again made contact with Plaintiff's genitals.
34. Defendant's contact with Plaintiff was offensive to Plaintiff.
35. Defendant's contact with Plaintiff would be offensive to a reasonable person.
36. Plaintiff did not consent to Defendant's contact with Plaintiff.
37. Defendant's contact with Plaintiff was unlawful.
38. Defendant's contact with Plaintiff was unjustified.
39. Defendant acted with intent to cause Plaintiff offensive contact.
40. Defendant's contact with Plaintiff caused Plaintiff to be in apprehension of offensive contact.
41. Plaintiff's apprehension of offensive contact by Defendant was reasonable.

BATTERY

42. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 through 41 herein.
43. Defendant's contact with Plaintiff caused Plaintiff emotional distress.

FALSE IMPRISONMENT

44. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 through 43 herein.
45. Plaintiff did not consent to Defendant's confinement of Plaintiff by physical barrier.
46. Defendant's confinement of Plaintiff by physical barrier was unlawful.

47. Defendant's confinement of Plaintiff by physical barrier was unjustified.

48. Defendant's confinement of Plaintiff caused Plaintiff emotional distress.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

49. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 through 48 herein.

50. Defendant's conduct was extreme and outrageous.

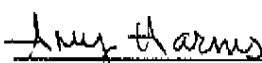
51. Defendant intended to cause Plaintiff emotional distress.

52. Defendant acted with reckless disregard of the probability that Plaintiff would suffer emotional distress.

53. Defendant's conduct caused Plaintiff emotional distress.

WHEREFORE, Plaintiff prays judgment against Defendant in a fair and just amount in excess of \$25,000.00 and for other and further orders as this Court deems just and proper under the circumstances.

Respectfully submitted,



Amy Harms
Pro Se Plaintiff



IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL KELLAN MULLEN	Case Number: 1722-CC01003	Special Process Server 1 Special Process Server 2 Special Process Server 3
Plaintiff/Petitioner: AMY HARMS	Plaintiff's/Petitioner's Attorney/Address AMY ELIZABETH HARMS 1000 N PINE ST SUITE B ROLLA, MO 65401	
Defendant/Respondent: STEVEN ROBERTS JR	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Other Tort		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: STEVEN ROBERTS JR
Alias:

MISSOURI HOUSE OF REPRESENTATIVES
201 W CAPITOL AVE RM 109-H
JEFFERSON CITY, MO 65101

COLE COUNTY, MO

COURT SEAL OF

CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

April 18, 2017

Date

Thomas Hoeyinger
Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.
- (for service on a corporation) delivering a copy of the summons and a copy of the petition to

_____ (name) _____ (title).

other _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date

Notary Public

Sheriff's Fees

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary \$ _____
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$. _____ per mile)
 Total \$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.