

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

JARDENA M. GREEN)
)
Plaintiff,) Cause #:
)
vs.) Division No.:

EDMUND BEN TAUKE)
d/b/a STL Mugshots and
StL Mugshots Removal)

Serve at: 3628 (A) Shaw Blvd.
St. Louis City, Mo., 63110

Defendant

PLAINTIFF'S PETITION

COMES NOW Plaintiff, Jardena Green, and for her cause of action against,
Defendant, **Edmund Ben Tauk**, states as follows:

1. Plaintiff, is an adult resident of the County of St. Louis, State of Missouri.
2. That at all times herein mentioned, Defendant, **Tauk** is an adult resident of the City of St. Louis, State of Mo.
3. That at all times herein mentioned, Defendant Tauk was doing business as **StLMugshots** publishing mugshot photos, personal and arrest information on his website **StLMugshots.com** and **Facebook Page** and other publications **and d/b/a StLMugshots Removal** for the purpose of removing such postings for a fee.
4. This lawsuit is filed pursuant to **RSMO.Sec 407.1150** providing civil action

and damages against anyone posting publishing mugshot photos, personal and arrest information for purpose of obtaining a fee for removal of same, stating:

“It shall be unlawful for any person engaged in publishing or otherwise disseminating criminal record information through a print or electronic medium to solicit or accept from a subject individual the payment of a fee or other consideration to remove or correct criminal record information.”

And providing the right to civil suit and damages as follows:

“any subject individual who suffers a loss or harm as a result of a violation of this section may be awarded an amount equal to ten thousand dollars or actual and punitive damages, whichever is greater, and in addition may be awarded reasonable attorney's fees, court costs, and any other remedies provided by law. Humiliation or embarrassment shall be adequate to show that the plaintiff has incurred damages; however, no physical manifestation of either humiliation or embarrassment is necessary for damages to be shown.”

5. That sometime after May 10, 2015 Plaintiff sought and obtained records of arrest from REGIS by paying a fee for same, despite the fact that he was not a member of any law enforcement service or any judicial or court authority, or legitimate news agency, obtaining booking mugshot photo and other information including records of an arrest of Plaintiff for the minor municipal ordinance offense of Failure To Register a Vehicle.

6. Thereafter Plaintiffs full name, mug shot photo, sex, age, race, booking date and charge were posted by defendant on Defendant's website and Facebook Page, alongside other mug shots of alleged criminals, drug dealers, sex offenders, etc.

7. That prior to that posting by Defendant, Plaintiff , a mother of two children, had no type of criminal convictions, was and still is a college student at St. Louis Community College and Harris Stowe University, was and still is Tai Chi teacher for seniors with an international reputation as a Chinese Martial Arts Champion, was a model and holds a real estate license and works for a Real Estate Company.

8. That sometime in 2015, Plaintiff, to her great mortification, humiliation and embarrassment learned of this publication from her family, including her Operation Desert Storm war veteran father Gordon Green, relatives, friends, co workers, fellow students and who had seen the posting.

9. That Plaintiff contacted Defendant through the **StLMugshots.com** website listing seeking removal of said from said website, was contacted by StL Mugshots Removal seeking a fee for such removal which Plaintiff refused.

10. Plaintiff through counsel communicated through the **StLMugshots.com** website with defendant regarding the circumstances of her arrest advising that she was innocent of the the minor municipal ordinance offense of Failure To Register a Vehicle and was only arrested for Failure to Appear due to court notice to her being sent to the wrong address.

11. Defendant then communicated by e mail that the posting would only be removed if it was proven that the information was either incorrect or dismissed by the issuing

Hanley Hills Municipal Court, whereby Plaintiff set her case for trial on July 7, 2015 which resulted in her case (T121423920) being dismissed by the Court.

12. That even after the case was dismissed and proof provided to Defendant, Plaintiff's posting was still maintained on said website and she has suffered extreme embarrassment, loss of reputation and public humiliation even until this day.

13. Even after said posting was removed her mug shot photo did continue to appear anytime anyone did a Google search of Plaintiff's name.

14. It was impossible to learn the identity of the owner of StLMugshots until recently as Defendant had gone to great lengths to both hide and deny his involvement, connection and nefarious activities, leading one local lawyer to state online that:

"From a very practical standpoint, STL Mugshots have done an outstanding job masking who/what company owns and operates the site. They have proxy servers and PO Boxes. It is certainly possible to figure out who they are, but it will take time and money. "

15. Defendant's actions as described above were all **intentional, willful, vexatious and illegal.**

WHEREFORE, Plaintiff demands **maximum JUDGEMENT AGAINST** Defendant, **EDMUND BEN TAUKE** for **both actual and punitive damages,** as well as **Plaintiff's attorney fees and costs** as provided by law and all in excess of the **\$25,000 jurisdictional limit.**

J. Justin Meehan #24844

Attorney for Plaintiff

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