

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
TWENTY-SECOND JUDICIAL CIRCUIT
STATE OF MISSOURI**

STEPHEN TAMARI,

Plaintiff,

v.

WASHINGTON UNIVERSITY IN
SAINT LOUIS

Serve:

Office of the Executive Vice Chancellor
and General Counsel
One Brookings Drive
Campus Box 1058
St. Louis, MO 63130

Defendant.

Cause No.: _____

Div. _____

JURY TRIAL DEMANDED

PETITION

Stephen Tamari states as follows:

INTRODUCTION

1. Stephen Tamari is a 65-year-old professor of early modern history. He is a Quaker and a pacifist. With no justification, private police at Washington University in St. Louis broke nine of Professor Tamari's ribs while he was on the ground with his hands zip-tied behind his back.

PARTIES

2. Professor Tamari is a citizen of the United States and a resident of the State of Illinois.

3. Washington University in St. Louis ("Washington University") is a private corporation chartered by the State of Missouri pursuant to special legislation in 1853 and 1857, respectively. Its principal place of business is the State of Missouri.

JURISDICTION, VENUE, and JURY DEMAND

4. The exercise of jurisdiction is proper, as the Defendant is a Missouri corporation and the acts alleged all occurred within the State of Missouri.

5. This action is brought within the applicable statute of limitations.

6. Venue is proper in the Circuit Court of the City of St. Louis because the wrongful acts resulting in injury to Professor Tamari occurred within the City of St. Louis.

7. Plaintiff demands a trial by jury.

ALLEGATIONS COMMON TO ALL COUNTS

8. On April 27, 2024, Professor Tamari and his wife attended a protest at Washington University in St. Louis.

9. The protest was outdoors and peaceful. Between 100 and 200 people attended – students, staff, professors, and community members.

10. After a short march, the protesters gathered in the green space in front of Washington University's entrance.

11. This was not atypical, as Washington University has a long history of allowing peaceful protests on its campus.

12. Professor Tamari stayed at the edge of the gathering, near some children who were running and playing. He occasionally passed out water to other attendees.

13. Washington University officials were present at the protest and moved in and out of the crowd without incident.

14. Professor Tamari planned to leave when the police moved in on the protest.

15. Seeing that the police intended to arrest the entire crowd, and fearing for the safety of the students, Professor Tamari took out his phone and began to record.

16. Washington University's Director of Law Enforcement Operations pointed out Professor Tamari to the police, indicating that the officers should arrest him.

17. Officers from Washington University and the St. Louis County Police Department moved to arrest Professor Tamari.

18. An officer with the Washington University Police Department tackled Professor Tamari to the ground. Three officers from the St. Louis County Police Department assisted this officer in tackling Professor Tamari. Professor Tamari was doing nothing wrong. He was merely documenting the use of force against peaceful students by sworn law enforcement officers, most of whom are public employees.

19. As he was tackled to the ground, Professor Tamari lost his glasses. The officers zip-tied the professor.

20. Shaken and confused, Professor Tamari was dragged by a Washington University officer and a St. Louis County officer toward a police van for transport to the St. Louis County jail.

21. A Washington University officer who had not participated in the arrest of Professor Tamari decided to take matters into his own hands. While Professor Tamari was zip-tied and under the control of the two other officers, this officer, using the full force of his body weight, drove his knee into Professor Tamari's torso twice.

22. The officer broke Professor Tamari's ribs and caused additional injuries. Professor Tamari spent two nights in the hospital and continues to suffer from his injuries. On information

and belief, Professor Tamari suffered the most significant injuries in America as a result of campus protests in the summer of 2024.

23. The actions described above were all taken by Washington University employees acting within the scope of their employment. These actions were authorized and approved by Washington University's administrative officers.

COUNT I – BATTERY

(Against Defendant Washington University)

25. Plaintiff re-alleges and incorporates herein by reference all prior paragraphs as if fully stated herein.

26. Washington University officers, without lawful justification, physically attacked Plaintiff. Plaintiff did not consent to the contact.

27. One officer seriously injured Professor Tamari while he was on the ground and zip-tied. Professor Tamari continues to suffer from the physical pain and emotional trauma of the event.

28. The officers were employed by and under the control of Defendant Washington University.

29. The officers acted within the scope of their employment.

30. The officers were expected to interact with the public and utilize physical force.

31. Defendant Washington University authorized and approved the officers' acts that injured Professor Tamari. Public communications from Washington University subsequent to April 27, 2024, make clear that the University believes that its officers acted within the scope of their employment.

WHEREFORE, Plaintiff respectfully requests judgment in his favor against

Defendant for compensatory damages, plus court costs, and for all other and further relief the Court deems appropriate. Plaintiff reserves the right to seek punitive damages pursuant to RSMo § 510.261.

Date: March 5, 2025

Respectfully submitted,

KHAZAELI WYRSCH LLC

/s/ John M. Waldron

Javad Khazaeli, 53735MO

James R. Wyrsh, 53197MO

John M. Waldron, 70401MO

Brendan Roediger, 60585MO

911 Washington Avenue, Suite 211

Saint Louis, MO 63101

(314) 288-0777

(314) 400-7701 (fax)

javad.khazaeli@kwlawstl.com

james.wyrsh@kwlawstl.com

jack.waldron@kwlawstl.com

brendan.roediger@slu.edu

Attorneys for Plaintiffs