

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PATRICIA VON ZUR MUEHLEN

Plaintiff,

vs.

ST. REGIS APARTMENTS, INC.

Serve:

SENTRY MANAGEMENT, INC.

9666 Olive Blvd.

Suite 116

St Louis, Missouri 63132

and

**BOARD OF DIRECTORS OF ST. REGIS
APARTMENTS, INC.**

Serve:

SENTRY MANAGEMENT, INC.

9666 Olive Blvd.

Suite 116

St Louis, Missouri 63132

and

**WILLIAM J. KUEHLING,
In his capacity as the President of St. Regis
Apartments, Inc.; and in his capacity as a
Board Member of the Board of Directors
of St. Regis Apartments; Inc.,
and as a shareholder of St. Regis
Apartments, Inc.; and as an individual,**

Serve:

William J. Kuehling

4944 Lindell Blvd, Apt. 4E

St. Louis, MO 63108

and

Case Number:

JURY TRIAL DEMANDED

JAMES JOSEPH SCHLAFLY III,
In his capacity as the Secretary of St. Regis
Apartments, Inc.; and in his capacity as a
Board Member of the Board of Directors
of St. Regis Apartments, Inc.;
and as a shareholder of St. Regis
Apartments, Inc.; and as an individual,

Serve:
James Joseph Schlafly III
4950 Lindell Blvd., Apt. 7W
St. Louis, MO 63108

and

GREGORY A. VOGELWEID,
In his capacity as the Vice President of St. Regis
Apartments, Inc.; and in his capacity as a
Board Member of the Board of Directors
of St. Regis Apartments, Inc.;
and as a shareholder of St. Regis
Apartments, Inc.; and as an individual,

Serve:
Gregory A. Vogelweid
4954 Lindell Blvd., Apt. 6W
St. Louis, MO 63108

and

DR. PATRICIA A. PENKOSKE
In her capacity as a Board Member of the
Board of Directors of St. Regis Apartments,
Inc.; and as a shareholder of St. Regis
Apartments, Inc.; and as an individual,

Serve:
Dr. Patricia A. Penkoske
4944 Lindell Blvd., Apt. 4W
St. Louis, MO 63108

and

ROBERT PARKS
In his capacity as a Board Member of the

JURY TRIAL DEMANDED

**Board of Directors of St. Regis Apartments,
Inc.; and as a shareholder of St. Regis
Apartments, Inc.; and as an individual,**

**Serve:
Robert Parks
4954 Lindell Blvd., Apt. 7E
St. Louis, MO 63108**

and

**MAURA RAFUSE
In her capacity as a Board Member of the
Board of Directors of St. Regis Apartments,
Inc.; and as a shareholder of St. Regis
Apartments, Inc.; and as an individual,**

**Serve:
Maura Rafuse
4950 Lindell Blvd., Apt. 6E
St. Louis, MO 63108**

and

**LOUIS VLASATY,
In his capacity as the Treasure of St. Regis
Apartments, Inc.; and in his capacity as a
Board Member of the Board of Directors
of St. Regis Apartments, Inc.;
and as a shareholder of St. Regis
Apartments, Inc.; and as an individual,**

**Serve:
Louis Vlasaty
4954 Lindell Blvd., Apt. 2W
St. Louis, MO 63108**

and

**KATHARYN B. DAVIS, ESQ.
In her capacity as the Attorney for the
Board of Directors of St. Regis Apartments,
Inc.; in her capacity as the attorney for the
for the Secretary of St. Regis Apartments, Inc.;
and as a shareholder of St. Regis
Apartments, Inc.; and as an individual,**

JURY TRIAL DEMANDED

Serve:

Katharyn B. Davis, Esq.
4954 Lindell Blvd., Apt. 4E
St. Louis, MO 63108

Defendants.

)
)
)
)
)
)
)
)
)

JURY TRIAL DEMANDED

COMPLAINT
FOR VIOLATION OF THE FAIR HOUSING ACT

COMES NOW, Plaintiff, Patricia von zur Muehlen, by and through her attorney, Michael T. George, and the Law Firm of Michael T. George, P.C., and for her *Complaint for Violation of the Fair Housing Act* states as follows:

Nature of the Case

1. Patricia von zur Muehlen brings this action for declaratory and injunctive relief, monetary damages, punitive damages, and civil penalties pursuant to the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended (FHA), 42 U.S.C. §§ 3601-3631, against various individuals and one corporation, who all acted in concert to discriminate against her by otherwise making unavailable and denying her a residential dwelling at Center Court, Floor Seven, East Side, in the St. Regis Apartments, Inc., such dwelling commonly known as Unit C7E, at 4950 Lindell Boulevard, in the City of St. Louis, on the basis of race.

Parties to this Action

2. Patricia von zur Muehlen, is a natural person residing in and domiciled in St. Louis County, State of Missouri.
3. St. Regis Apartments, Inc. is a duly organized Missouri corporation operating a large apartment complex of 48 residential dwellings located at 4944-4950-4954 Lindell Boulevard, in the City of St. Louis, State of Missouri, with a zip code of 63108.
4. St. Regis Apartments, Inc. maintains its primary place of business operation at 4944-4950-4954 Lindell Boulevard in the City of St. Louis, with a registered agent located at 9666 Olive Boulevard, Suite 116, in the County of St. Louis.
5. William J. Kuehling is domiciled in Missouri and resides in unit 4E in the East Court of the St. Regis Apartments, Inc. at 4944 Lindell Boulevard, St. Louis, Missouri, 63108.
6. William J. Kuehling, while registered with the Missouri Secretary of State as a member of the Board of Directors, but not registered with the Missouri Secretary of State as the President of St. Regis Apartments, Inc., at all times relevant to this Complaint, held himself out as a member of the Board of Directors of St. Regis Apartments, Inc., and as the President of St. Regis Apartments, Inc., and at all relevant times is a shareholder of St. Regis Apartments, Inc., and acted in his official and individual capacities.
7. James Joseph Schlafly III is domiciled in Missouri and resides in unit 7W in Center Court of the St. Regis Apartments, Inc. at 4950 Lindell Boulevard, St. Louis, Missouri, 63108.

8. James Joseph Schlafly III, while not registered with the Missouri Secretary of State as the Secretary of St. Regis Apartments, Inc. nor as a member of the Board of Directors of St. Regis Apartments, Inc., at all times relevant to this Complaint, held himself out as a member of the Board of Directors of St. Regis Apartments, Inc., and as the Secretary of St. Regis Apartments, Inc., and at all relevant times is a shareholder of St. Regis Apartments, Inc., and acted in his official and individual capacities.
9. Gregory A. Vogelweid is domiciled in Missouri and resides in unit 6W in the West Court of St. Regis Apartments, Inc. at 4954 Lindell Boulevard, St. Louis, Missouri, 63108.
10. Gregory A. Vogelweid, at all times relevant to this Complaint held himself out as the Vice President of St. Regis Apartments, Inc. Gregory A. Vogelwied is registered as the Vice President of St. Regis Apartments, Inc. with the Missouri Secretary of State. However, Gregory A. Vogelwied is not registered with the Missouri Secretary of State as a Board of Director of St. Regis Apartments, Inc. Yet, Gregory A. Vogelweid, at all times relevant to this Complaint held himself out as a member of the Board of Directors of St Regis Apartments Inc., and at all relevant times is a shareholder of St. Regis Apartments, Inc., and acted in his official and individual capacities.
11. Dr. Patricia A. Penkoske is domiciled in Missouri, and resides in unit 4W in the East Court of St. Regis Apartments, Inc. at 4944 Lindell Boulevard, St. Louis, Missouri, 63108.

12. Dr. Patricia A. Penoske, while not registered with the Missouri Secretary of State as a member of the Board of Directors of St. Regis Apartments, Inc., at all times relevant to this Complaint, held herself out as a member of the Board of Directors of St. Regis Apartments, Inc, and at all relevant times is a shareholder of St. Regis Apartments, Inc., and acted in her official and individual capacities.
13. Robert Parks is domiciled in Missouri, and resides in unit 7E in the West Court at the St. Regis Apartments, Inc. at 4954 Lindell Boulevard, St. Louis, Missouri, 63108.
14. Robert Parks, while not registered with the Missouri Secretary of State as a member of the Board of Directors of St. Regis Apartments, Inc., at all times relevant to this Complaint held himself out as a member of the Board of Directors of St. Regis Apartments, Inc., and at all relevant times is a shareholder of St. Regis Apartments, Inc., and acted in his official and individual capacities.
15. Maura Rafuse is domiciled in Missouri, and resides in unit 6E in the Center Court at the St. Regis Apartments, Inc. at 4950 Lindell Boulevard, St. Louis, Missouri, 63108.
16. Maura Rafuse, while not registered with the Missouri Secretary of State as a member of the Board of Directors of St. Regis Apartments, Inc., at all times relevant to this Complaint held herself out as a member of the Board of Directors of St. Regis Apartments, Inc., and at all relevant times is a shareholder of St. Regis Apartments, Inc., and acted in her official and individual capacities.

17. Louis Vlasaty is domiciled in Missouri and resides in unit 2W in the West Court at the St. Regis Apartments, Inc. at 4954 Lindell Boulevard, St. Louis, Missouri, 63108.
18. Louis Vlasaty, at all times relevant to this Complaint held himself out as the Treasurer of St. Regis Apartments, Inc. Louis Vlasaty is registered as the Treasurer of St. Regis Apartments, Inc. with the Missouri Secretary of State. However, Louis Vlasaty is not registered with the Missouri Secretary of State as a Board of Director of St. Regis Apartments, Inc. Yet, Louis Vlasty, at all times relevant to this Complaint held himself out as a member of the Board of Directors of St. Regis Apartments, Inc., and at all relevant times is a shareholder of St. Regis Apartments, Inc., and acted in his official and individual capacities.
19. Katharyn B. Davis, Esq. is domiciled in Missouri and resides in unit 4E in West Court at the St. Regis Apartments, Inc. at 4954 Lindell Boulevard, St. Louis, Missouri, 63108.
20. Katharyn B. Davis, Esq., at all times relevant to this Complaint, held herself out as the attorney for the Board of Directors for St. Regis Apartments, Inc., and as an attorney for James Joseph Schlafly III, the Secretary of St. Regis Apartments, Inc., and at all relevant times is a shareholder of St. Regis Apartments, Inc., and acted in her official and individual capacities.

Jurisdiction and Venue

21. This Court has jurisdiction over this matter and may grant the relief sought herein pursuant to 28 U.S.C. § 1331 and 42 U.S.C. § 3613(a)(1)(A).

22. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because the events giving rise to the instant claims occurred within the District, the dwelling that is the subject of the Complaint is within the District, and all of the Defendants reside in this District.

Factual Allegations Common to All Counts

23. On April 10, 2018 the Circuit Court of the City of St. Louis, Probate Division ordered Martin Lipsitz, Special Fiduciary of the Albert L. Simpkins Living Trust dated August 21, 1998 “to transfer St. Regis Apartment, Inc. Stock Certificate No. 267, herewith attached, and all rights, title, and property interests in the St. Regis Cooperative and commonly known as Center Court, Floor Seven, East Side of St. Regis Apartments, Inc., 4950 Lindell Boulevard, St. Louis, Missouri 63108 to Patricia von zur Muehlen.”
24. In that same April 10, 2018 Order, the Circuit Court of the City of St. Louis, Probate Division ordered, “ [T]hat Martin Lipsitz Special Fiduciary shall distribute all the contents of the St. Regis Cooperative to Patricia von zur Muehlen ...”
25. On July 20, 2018 the Circuit Court of the City of St. Louis, Probate Division ordered, “Martin Lipsitz, Special Fiduciary of the Albert L. Simpkins living Trust dated August 21, 1998 to comply with the parties Settlement Agreement and immediately, but no later than ten days from this order, assign and transfer St. Regis Apartments, Inc. Stock Certificate No. 267, with all its accompanying

rights, duties, and interests to Patricia von zur Muehlen, by signing the attached Assignment of Stock Certificate No. 267 herewith attached as Exhibit A.”

26. In that same July 20, 2018 Order, the Circuit Court of the City of St. Louis, Probate Division ordered, “[T]hat Martin Lipsitz, Special Fiduciary of the Albert L. Simpkins living Trust dated August 21, 1998, shall sign the attached Distribution and Assignment of Contents and Personal Property to Patricia von zur Muehlen herewith attached as Exhibit B.”
27. On July 23rd 2018 Martin Lipsitz, Special Fiduciary and Acting Successor Trustee of the Albert L. Simpkins Living Trust dated August 21, 1998 executed the Assignment of Stock Certificate No. 267 to Patricia von zur Muehlen. (See the Assignment of Stock Certificate No. 267, herewith attached as Exhibit A.)
28. On July 23rd 2018 Martin Lipsitz, Special Fiduciary and Acting Successor Trustee of the Albert L. Simpkins Living Trust dated August 21, 1998 executed the Distribution and Assignment of Contents and Personal Property to Patricia von zur Muehlen. (See the Distribution and Assignment of Contents and Personal Property, herewith attached as Exhibit B.)
29. On July 30th, 2018 Patricia von zur Muehlen tendered Stock Certificate No. 267 to the Secretary of St. Regis Apartments, Inc. for transfer to her.
30. On July 30th, 2018 Patricia von zur Muehlen tendered the Assignment of Stock Certificate No. 267 to the Secretary of St. Regis Apartments, Inc.
31. St. Regis Apartments, Inc. has kept Stock Certificate No. 267 and the Assignment of Stock Certificate No. 267, but refuses to transfer ownership of unit C7E to Patricia von zur Muehlen.

32. St. Regis Apartments, Inc. refuses to allow Patricia von zur Muehlen entry to the St. Regis Apartments.
33. St. Regis Apartments, Inc. has threatened Patricia von zur Muehlen with trespass charges if she and her relatives attempt to enter the St. Regis Apartments.
34. St. Regis Apartments, Inc. refuses to allow Patricia von zur Muehlen and her relatives access, use, and enjoyment of the common facilities and privileges that all of the owners of the residential units in St. Regis Apartments are allowed to access, use, and enjoy.
35. The City of St. Louis is 46.7% African American and 43.5% Caucasian.
36. Upon information and belief, St. Regis Apartments has 48 units, 75 residents, of which zero are African Americans, and 75 are Caucasian.
37. St Regis Apartments, through discriminatory housing practices, is perpetuating itself as an elite enclave of Caucasian housing within the City of St. Louis.
38. Patricia von zur Muehlen's daughter-in-law; four of her grandchildren; and three of her great grandchildren are African American.
39. The above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, have denied, and are continuing to deny, Patricia von zur Muehlen her right to own,

to occupy, and to live in unit C7E because her family has African American members.

40. Unit C7E remains open and unoccupied, but unavailable to Patricia von zur Muehlen and her family.

Count I: Violation of the Fair Housing Act Against All Defendants

41. Plaintiff re-alleges and incorporates herein by reference paragraphs 1 through 40 from above, as if fully set forth in this paragraph.
42. Unit C7E is a “dwelling” within the meaning of the Fair Housing Act as defined in 42 U.S.C. § 3602(b).
43. Patricia von zur Muehlen is an “aggrieved person” within the meaning of the Fair Housing Act as defined in 42 U.S.C. § 3602(i)(1).
44. The above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, have refused and otherwise made unavailable and denied dwelling C7E to Patricia von zur Muehlen because of race and familial status.
45. The above named Defendants, each and every one, including William J. Kuehlin; James Joseph Schlafly; III, Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors

of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, have aided and encouraged each of the others to engage in a pattern of actions to discourage, prevent, and bar Patricia von zur Muehlen and her African American relatives from being present on the property of St. Regis Apartments.

46. The above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, have aided and encouraged each of the others to refuse to allow Patricia von zur Muehlen and her relatives access, use, and enjoyment of the common facilities and privileges that all of the owners of residential units in St. Regis Apartments are allowed to access, use, and enjoy with their families.

47. The conduct of the above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, was done in a willful, wanton, and malicious manner towards Patricia von zur Muehlen, with complete disregard of her rights to possess, dwell, and quietly enjoy life at the St. Regis Apartments in unit C7E with her family.

48. The conduct of the above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, is so egregious that punitive damages are justified to deter these Defendants or others from such repugnant conduct in the future.

WHEREFORE, Plaintiff Patricia von zur Muehlen prays that upon trial of this matter, that the above named Defendants, each and every one of them, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, be found to have violated the Fair Housing Act, and that the Court award damages in a reasonable amount greater than \$1,000,000.00 against each and every Defendant found to have violated the Fair Housing Act, and award attorney fees and costs, and award punitive damages against each and every Defendant in an amount deemed reasonable and sufficient to deter that Defendant or others from such conduct in the future, and enjoin each and every Defendant from continuing to make unit C7E unavailable to Patricia von zur Muehlen, and enjoin each and every Defendant from interfering with Patricia von zur Meuhlen and her family's quiet enjoyment of unit C7E and all the amenities and services at St. Regis Apartments, and for such other and further relief in the premises as the Court deems just and proper.

Count II: Conversion of Personal Property Against All Defendants

49. Plaintiff re-alleges and incorporates herein by reference paragraphs 1 through 48 from above, as if fully set forth in this paragraph.
50. All of the personal property currently contained in unit C7E is owned by and belongs to Patricia von zur Muehlen.
51. The above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, have usurped control over all of the personal property currently contained in unit C7E and are excluding Patricia von zur Muehlen from possessing, managing, and enjoying the personal property in unit C7E.
52. The conduct of the above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, was done in a willful, wanton, and malicious manner towards Patricia von zur Muehlen, with complete disregard of her rights to possess, manage, and enjoy her personal possessions contained in unit C7E.

53. The conduct of the above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, is so egregious that punitive damages are justified to deter these Defendants or others from such repugnant conduct in the future.

WHEREFORE, Plaintiff Patricia von zur Muehlen prays that upon trial of this matter, that the above named Defendants, each and every one of them, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, be found to have converted her personal property contained in Unit C7E, and that the Court award damages in a reasonable amount greater than \$100,000.00, and award attorney fees and costs, and award punitive damages against each and every Defendant in an amount deemed reasonable and sufficient to deter that Defendant or others from such conduct in the future, and for such other and further relief in the premises as the Court deems just and proper.

Count III: Civil Conspiracy to Violate the Fair Housing Act Against All Defendants

54. Plaintiff re-alleges and incorporates herein by reference paragraphs 1 through 53 from above, as if fully set forth in this paragraph.

55. The above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, after coming to a meeting of their minds, conspired, aided, and encouraged each other to refuse, deny, and otherwise make unavailable, dwelling C7E to Patricia von zur Muehlen because of race and familial status.
56. The above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, after coming to a meeting of their minds, conspired, aided, and encouraged each other to discourage, prevent, and bar Patricia von zur Muehlen and her African American relatives from being present on the property of St. Regis Apartments.
57. The above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, after coming to a meeting of their minds, conspired, aided, and encouraged each other to refuse to allow Patricia von zur Muehlen and her relatives access, use,

and enjoyment of the common facilities and privileges that all of the owners of residential units in St. Regis Apartments are allowed to access, use, and enjoy with their families.

58. As a direct and proximate result of the Defendants engaging in their conspiracy to violate the Fair Housing Act of the United States of America. Patricia von zur Muehlen has been damaged.
59. The conduct of the above named Defendants, each and every one, including William J. Kuehling, James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, was done in a willful, wanton, and malicious manner towards Patricia von zur Muehlen, with complete disregard of her rights to possess, dwell, and quietly enjoy life at the St. Regis Apartments in unit C7E with her family.
60. The conduct of the above named Defendants, each and every one, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, is so egregious that punitive damages are justified to deter these Defendants or others from such repugnant conduct in the future.

WHEREFORE, Plaintiff Patricia von zur Muehlen prays that upon trial of this matter, that the above named Defendants, each and every one of them, including William J. Kuehling; James Joseph Schlafly III; Gregory A. Vogelweid; Dr. Patricia A. Penoske; Robert Parks; Maura Rafuse; Louis Vlasaty; The Board of Directors of St. Regis Apartments, Inc.; and St. Regis Apartments, Inc.; and Katharyn B. Davis; in all of their official, and in all of their individual capacities, be found to have conspired to violate the Fair Housing Act, and that the Court award damages in a reasonable amount greater than \$100,000.00, and award attorney fees and costs, and award punitive damages against each and every Defendant in an amount deemed reasonable and sufficient to deter that Defendant or others from such conduct in the future, and for such other and further relief in the premises as the Court deems just and proper.

Respectfully submitted,

The Law Firm of Michael T. George, P.C.

/s/ Michael T. George

Michael T. George, #51800MO
214 S. Bemiston Ave., Suite 2 South
St. Louis, MO 63105
Phone 314-965-2600
Fax 314-584-2384
mtglaw1@gmail.com

***Attorney for Plaintiff
Patricia von zur Muehlen***