


EXHIBIT A

[Click here to Respond to Selected Documents](#)

Sort Date Entries: **Descending** Ascending

Display Options: All Entries 

09/20/2023

Entry of Appearance Filed

Entry of Appearance of J. Russel Jackson.

Filed By: JAMES RUSSELL JACKSON

On Behalf Of: ANTI DEFAMATION LEAGUE

Motion Filed

Motion to Vacate Hearing.

Filed By: MATTHEW DOMINIC AMPLEMAN

On Behalf Of: ANTI DEFAMATION LEAGUE

Entry of Appearance Filed

Entry of Appearance of Matt Ampleman.

Filed By: MATTHEW DOMINIC AMPLEMAN

On Behalf Of: ANTI DEFAMATION LEAGUE

08/25/2023

Summons Returned Non-Est

Document ID - 23-ADSM-559; Served To - GREENBLATT, JONATHAN; Server - SO ST LOUIS COUNTY-CLAYTON; Served Date - 23-AUG-23; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Non-est; Service Text - NON-EST-UNKNOWN AT ADDRESS GIVEN 8/23/23 0800

Summons Returned Non-Est

Document ID - 23-ADSM-560; Served To - DOE, JOHN; Server - SO ST LOUIS COUNTY-CLAYTON; Served Date - 25-AUG-23; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Non-est; Service Text - NON-EST-UNKNOWN AT ADDRESS GIVEN 8/23/23 0800

Corporation Served

Document ID - 23-ADSM-558; Served To - ANTI DEFAMATION LEAGUE; Server - SO ST LOUIS COUNTY-CLAYTON; Served Date - 23-AUG-23; Served Time - 08:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - SERVED MELISSA RECEPTIONIST

Notice of Service

23-ADSM-559.

Notice of Service

23-ADSM-560.

Notice of Service

23-ADSM-558.

08/16/2023

Notice of Court Hearing Sent

Summons Issued-Associate

Document ID: 23-ADSM-560, for DOE, JOHN.

Summons Issued-Associate

Document ID: 23-ADSM-559, for GREENBLATT, JONATHAN.

Summons Issued-Associate

Document ID: 23-ADSM-558, for ANTI DEFAMATION LEAGUE.

Hearing Scheduled

Scheduled For: 09/25/2023; 2:00 PM; BRANDON B FISHER; Vernon

Redaction Certification Filed
Confid Filing Info Sheet Filed
Pet Filed in Associate Ct
Judge Assigned

IN THE CIRCUIT COURT OF VERNON COUNTY, MISSOURI

FILED

AUG 16 2023

Vernon County
Circuit Court

DARRELL MCCLANAHAN

Plaintiff,

23VE-CV00534

-Vs-

ANTI-DEFAMATION LEAGUE

JONATHAN GREENBLATT AND THREE JOHN/JANE DOE DEFENDANTS,

Defendant.

CIVIL COMPLAINT FOR DAMAGES

COMES NOW, Plaintiff, Darrell McClanahan, Pro Se submits the following Complaint and states as follows:

I. PRELIMINARY STATEMENT

1. Plaintiff in recent years has entered political races both state and federal; Plaintiff describes himself as a Pro-White man, horseman, politician, political prisoner-activists who is dedicated to traditional Christian values.
2. On October 16, 2022 Anti-Defamation League, published a national article titled "ADL Researchers Identify Failed Extremist Candidates in Missouri and North Carolina." Therein identifying the Plaintiff as an Anti-Semitic White Supremacist among other defamatory statements.
3. Plaintiff seeks money damages for the insult, embarrassment, humiliation, mental suffering, anguish, injury to his name, professional reputation, and loss of community trust caused by the ADL's defamation.

II. PARTIES and DIVERISTY OF CITIZENSHIP

4. (a) Plaintiff Darrell McClanahan is a private individual and a citizen of Missouri, and the United States and current address is: 24346 S. 2425 Rd. Milo, MO 64767
- (b) Defendant Jonathan Greenblatt ADL, and John/Jane Doe Defendants are a non-profit corporation organized under the laws of the District of Columbia located: 605 3rd Avenue New York, City, New York 10158 and are citizens of the United States.

STATEMENT OF FACTS

5. Defendant, ADL, is a non-profit corporation organized under the laws of the District of Columbia. Its principal place of business is New York. ADL holds itself out as an "anti-hate organization that seeks to stop the defamation of the Jewish people."
6. Defendant ADL and its members are located in New York, City, New York and has operated in New York since its founding in the year of 1913.
7. Plaintiff is a permanent resident of the State of Missouri, and was such resident for the past several years prior to the filing of the above styled cause.
8. That by the actions alleged herein Defendant ADL violated their duty of care to screen information for truth and veracity to protect the person's they publish stories about, and by said violation Plaintiff suffered damage.
9. Plaintiff is informed and believes and based upon such information and belief allege that Defendant ADL and/or said John/Jane Doe Defendants are and have been engaged in a targeted campaign of defamation to destroy Plaintiff Darrell McClanahan's reputation and livelihood; disparaging Plaintiff's independent run for election to the United States House to represent Missouri's 4th Congressional.
 - (a) ADL operatives throughout the United States have excessively published the false and defamatory statement that Plaintiff is Anti-Semitic and a White Supremacist all to Plaintiff's detriment causing deaths threats and perpetual harassment to Plaintiff and his family from others who have read and believe the false statements printed by Defendants.
10. The ADL's Center on Extremism (COE) owned and operated by Defendants had a duty of care to properly research and investigate the facts of their articles and public statements and failed to do this in Plaintiff's case, which has caused substantial damage to Plaintiff's political career and/or political reputation and anxiety and distress for him and his family life since the printing of said defamatory material.
 - (a) Contrary to Defendants' accusation that Plaintiff McClanahan is a member of the Knight's Party, Ku Klux Klan (KKK), he is not and never has been. Plaintiff McClanahan was provided an Honorary 1-year membership by Missouri Coordinator Brian Christian. However, Plaintiff never pursued an active role in that membership and never participated in their activities.
11. Additionally, ADL's actual malice towards McClanahan is further evidenced by the fact ADL trolled McClanahan, labeling Plaintiff a White Supremacist, Sore Loser, Angry American in the August 16, 2022 publication. Plaintiff was misquoted out of context in his August 6th Facebook Post Declaration of Candidacy for 4th Congressional Missouri. McClanahan was referring to Missouri's Sore Loser Law allowing McClanahan to declare his candidacy as an independent candidate after losing the Republican primary for US Senate Missouri as allows by Law.

12. ADL made further defamatory false statements in the published article stating "These men did not openly express or share their extreme views during the primaries or in candidate forums." Plaintiff McClanahan did share openly his personal political beliefs. On June 3 and July 22, 2022, Plaintiff McClanahan posted on his Twitter Account Missouri Battleflag, a flyer he was handing out and providing to potential voters titled, "God's Covenant People exposes Satanic Commandments (Behavior)." Physical copies included a prayer of repentance.

(a) A link to McClanahan's Twitter was clearly and openly available to ADL's Center on Extremism (COE). Researchers would have been aware of this link between McClanahan and Missouri Battleflag on the Darrell McClanahan Facebook page as Plaintiff used Facebook Darrell McClanahan Twitter Missouri Battleflag, VKontakte Gordon Kahl, Donald Trump's Truth Social Missouri Battleflag. These social media pages were used as campaign websites McClanahan for US Senate. (See Plaintiff's Exhibit 1, attached hereto.)

13. Additional campaign material in the form of flyers in the amount of around 5,000 were handed out across the State of Missouri. These flyers were also posted on the above social media websites titled " Darrell Leon McClanahan III for US Senator, Missouri 2022." This flyer had McClanahan's promise to voters to what he would support and endorse. It also included promises to oppose. (See Plaintiff's Exhibit 2, attached hereto.)

III. DEFAMATION/LIBEL

14. This defamation and libelous campaign against Plaintiff by Defendant ADL continues to present and will continue unless stopped by the judiciary. The ADL and its agents made and published materials to third-parties including, but not limited to, advertisers, subscribers, readers, viewers, and followers of the ADL which was done in such reckless disregard Defendants were grossly negligent or did the same with purpose to intentionally harm Plaintiff McClanahan.

(a) ADL false and defamatory statements were published and republished from time of its publication to present. ADL reasonably should have known that the false defamatory statements about McClanahan would have been republished over and over and over by third parties millions of times to McClanahan's detriment and injury.

15. Plaintiff alleges that said ADL's false statements constitute defamation per se or defamation per quod. The statement imputes to McClanahan's unfitness to perform the duties of an office or employment for profit, or the want of integrity in the discharge of the duties of such political offices or employment. ADL's statements also prejudice McClanahan.

16. That Defendants ADL's false statements caused Plaintiff McClanahan to suffer and incur both presumed and actual damages, including insult, pain, embarrassment, humiliation, and mental suffering, harm to good name, and reputation, injury to reputation and possibly

causing the loss of the 4th Congressional election race November 8th, 2022, harming Plaintiff's political career.

17. Because of the actions of Said Defendants, Plaintiff McClanahan was held up for open condemnation, scorn, and public humiliation. This also resulted in opening McClanahan and family to potential social media attacks, for example:

18. January 31, 2023 McClanahan reported a disturbing Twitter user Jack 50H who commented, "I just read about you in a recent article regarding your Neo-Nazi work. I just wanted to send my hope that you will unalive yourself. Take Care." inferring McClanahan should kill himself. For reference, Twitter case number RAAEWfAaqMBowBAAHABDLvbE8V2ADf__w. Post was removed in violation of Community guidelines.

19 ADL falsely stated in the article published on August 16, 2022: "While unsuccessful, their candidacies are a stark reminder that extremists, some of whom may purposefully hide their extremist beliefs, continue to seek public office with the hope of influencing mainstream society." Was a false and defamatory statement that caused Plaintiff's reputation damage.

20. Defendants ADL felt the need to include Plaintiff McClanahan's religious activities in their defamatory articles, attempting to discourage other Christians from becoming a constituent of Plaintiff's.

21. ADL's COE researchers list "The Knight's Party, an Arkansas based Christian identity group led by Thomas Robb." Plaintiff did attend in 2019 a private religious Christian Identity Cross lighting ceremony falsely described as a cross burning protected by the 1st Amendment US Constitution. Plaintiff McClanahan's presence was in response to Charlottesville Unite the Right Rally Defendant Jacob Goodwin that received a 7-year prison sentence. Plaintiff believed this was an unjust sentence when Black Defendant Husain Senney received a 7-year sentence for Manslaughter. Plaintiff McClanahan criticized Attorney Jason Robb's involvement with Billy Roper saying they went to Little Rock to do everything they could do to stop the extradition. Plaintiff McClanahan admonished Attorney Robb for not filing a writ of Habeas Corpus.

22. In 2019, Plaintiff McClanahan was requested to write his thoughts on the Second Anniversary of the 2017 Unite the Right Rally. Plaintiff McClanahan wrote the article with a Pro-White perspective denouncing Anti-Whiteism as protected by the 1st Amendment US Constitution. A copy of the article is attached as Exhibit 3 in its entirety in the Torch Newsletter.

23. ADL's COE attacks McClanahan's Honorary membership to the League of the South never investigating if McClanahan believed in Southern secession or a White dominated South. Defendant ADL's COE make the conclusion for readers that these are the Plaintiff's beliefs. The Plaintiff has never advocated for Southern secession or a White dominated South. These are more defamatory statements by Defendant.

24. ADL's COE criticizes Plaintiff McClanahan for using screen name Gordon Kahl. Plaintiff McClanahan uses the screen name Gordon Kahl to bring awareness to the life story and injustice Plaintiff believes Gordon Kahl suffered. Plaintiff wishes to continue the avocation of Officer Jack McLamb praying to see the release of Gordon's son Yorie Kahl and co-defendant Scott Faul.

25. ADL's COE did invade Plaintiff's privacy by appropriating a photo of McClanahan 2021 with the caption "White Power" included in the article was an Anti-White attack upon the Plaintiff 1st Amendment denouncing the Plaintiff's belief that he is equal to other groups stating "Black Power" a movement encouraging Black people to take pride in being Black. "Gay Power" is the positive stance against discrimination and violence towards lesbian, gay, bisexual, and transgender people to promote their self-affirmation, dignity, equality rights, increase their ability as a social group, build community, and celebrate sexual diversity and gender variance. Asian pride is a positive stance to being Asian American. "Latin Power" Reconquista is a call to reclaim American lands. The ADL's COE describes "White Power" as a slogan primarily used for white separatist, white nationalist, neo-Nazi and white supremacist organizations to signal their racist viewpoints. All these statements are protected speech yet when Plaintiff McClanahan uses them, he was demonized by the ADL's COE.

26. ADL's COE states "McClanahan's social media posts include antisemitic, anti-government, white supremacist and bigoted content." Any comments made by the Plaintiff are protected by his 1st Amendment. These attacks were to interfere with Plaintiff McClanahan's pursuit as a write-in candidate for the 4th Congressional November 8, 2022. These defamatory statements were election interference.

27. ADL's COE denounce candidate McClanahan's appearance on Euro-Folk Radio with Eli James Christian Identity Preacher. Euro-Folk offers Plaintiff McClanahan a platform to advocate for American Political Prisoners. Plaintiff's appearances have been archived by Euro-Folk Radio. ADL's COE listen to these programs? If researchers at the ADL's COE had they would have realized Plaintiff McClanahan advocated many times for Irwin Schiff born to a Jewish Family, American libertarian and tax resistance advocate. Plaintiff McClanahan thought it unjust that Mr. Schiff passed away handcuffed to a prison bed. Where was the ADL's COE when a fellow Jewish man needed help for being persecuted for his 1st Amendment writings. ADL's COE deception refusing to acknowledge Plaintiff's advocacy for two incarcerated Jewish men, Irwin Schiff and Jeffrey Weinhaus. ADL's COE failed to investigate and listen to Euro-Folk archived programs. Plaintiff McClanahan on Euro-Folk Radio advocated for Anthony Troy Williams, a Black man believing him to be innocent. The show was co-hosted by investigative journalist William Waggoner. This radio program discussed the belief by all three parties, Plaintiff McClanahan, Eli James, and investigative journalist, all three advocating for Anthony Troy Williams' innocence.

28. As a result the ADL's libel and defamatory statements attacking the Plaintiff's character have deeply injured McClanahan and his family's good name.

29. ADL's COE deceptively included Joseph A. Gibson III pairing the plaintiff with him with statements like "These Men." Gibson is a member of Burt Colucci's National Socialist Neo-Nazi Group. Plaintiff McClanahan in 2019 called into Colucci's radio show and denounced Colucci's calls for violence against other races. Colucci attacked Plaintiff McClanahan calling him a "Sovereign Citizen" and a "Jew Lover" for advocating for Jeffrey Weinhaus. Shortly after the Plaintiff's radio appearance, Plaintiff was swatted. Plaintiff was informed caller alleged to be me making statements concerning Plaintiff's advocacy for Jeffrey Weinhaus. ADL's COE was not thorough in their investigation of Plaintiff McClanahan's activities. Plaintiff McClanahan also denounced in 2019 Shield Wall Network Leader Billy Roper's comments to Reuter's Bullets are better than sperm. Plaintiff also denounced Shield Wall members attacking Arkansas homosexuals. Plaintiff McClanahan was contacted by a radio podcast Straight Arm Radio and asked to call in an attempt to have Plaintiff ambush Billy Roper. The Plaintiff did so, telling him to repent and refrain from attacking the other races as that is not in God' plan. Roper and the Shield Wall Network sent out a mass email, "I'm not sure whether we will be going or not, because an infiltrator named Darrell McClanahan who expressed his interest in doxing a Shield Wall Network member and calling the police on him and publicly working against and attacking the Shield Wall Network on multiple forums and platforms is probably going to be there unless Pastor Robb tells him not to be. I feel the same way about him that Pastor Robb felt about Matt Heimbach at the Storm Front Conference two years ago. I really have no interest in being around a person who calls the police on our brother and wants to dox him and tries to cut us down at every turn on a crusade against us." Exhibit 4.

30. ADL made false statements with actual or constructive knowledge that they were false and with reckless disregard or whether they were false. ADL acted with malice and reckless disregard for the truth for the following reasons:

IV. ELECTION INTERFERENCE

31. By posting the article, ADL interfered with McClanahan's declared candidacy for the 4th Congressional of Missouri Election Nov 8, 2022, misquoting McClanahan's Aug 6th Facebook discussion about Missouri's Sore Loser law calling the Plaintiff an Angry American.

1. ADL knew the statements were false, and pursued a preconceived storyline without taking proper care in their investigation.

2. ADL published the preconceived narrative out of a desire to harm McClanahan and undermine his political campaign.

3. ADL knowingly presented un-truths and sensational statements in an effort to scare and profit from disparaging Plaintiff McClanahan.

4. ADL exhibited extreme bias, ill-will and a desire to hurt McClanahan because of McClanahan's support for Conservative values. The ADL chose to mislead and publish a false narrative about McClanahan.

5. The ADL claimed McClanahan to be Anti-Government. Anti-Government individuals would not have an interest in running for political office. ADL libeled McClanahan with this statement as candidate McClanahan is a believer in the rule of law believing no special privileges for special people race, color, or creed.

6. As a direct result of ADL's defamation/Libel, McClanahan suffered presumed damages and actual damages, including, but not limited to, insult, pain and suffering, emotional distress and trauma, anguish, stress, and anxiety, public ridicule, humiliation, embarrassment, indignity, damage and injury to personal and professional reputations, loss of enjoyment in life, and possible loss of the 4th Congressional.

PERMANENT INJUNCTION

Plaintiff request the Court to ORDER a Permanent Injunction against Defendant ADL to Remove the article from the internet, no longer use McClanahan's images, print a retraction of their damaging statements and refrain from ever libeling McClanahan again.

DAMAGES

Plaintiff seeks for judgment in ACTUALY DAMAGES in the amount of One Hundred Fifty Thousand Dollars (\$150,000.00) for emotional pain and suffering, anxiety and past, present and future damages to Plaintiff's Political Career.

Plaintiff seeks for judgment in PUNITIVE DAMAGES in the amount of Five Million Dollars (#5,000,000.00) if shown by adequate proof, that Defendant ADL intentionally and purposefully made said defamatory and libelous statements against Plaintiff.

VERIFICATION:

I, Plaintiff, Darrell McClanahan, do herein verify, under penalty of perjury that I have read the above and foregoing; that I know the contents thereof, and that the same is true and correct, to the best of my knowledge.

DATE: 8/15/23

WHEREFORE, Plaintiff prays that this Honorable Court issue a Scheduling Order for discovery, pretrial matters and trial, and for whatever other relief the Court deems appropriate at this time.

submitted,



Respectfully
Plaintiff Darrell McClanahan

2436 S. 2425 Rd.

Milo, MO

64767

417.388.9595

amlove555@gmail.com

SWORN DECLARATION

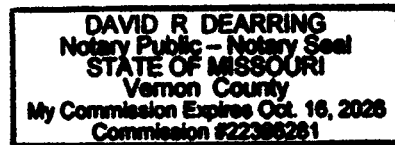
UNDER PENALTY OF PERJURY

I herein declare under penalty of

Perjury that the above and foregoing

Is true and correct, to the best of my knowledge.

DATE: 8/15/23



No certificate of service as a summons with complaint must be served on the defendants in accordance with court rules and statutes.



Name: Darrell McClanahan	Case Number: 23VE-CV00534	FILED AUG 16 2023 Vernon County Circuit Court Jonathan Greenblatt (Date File Stamp)
Address: 24346 S. 2425 RD Milo, MO 64767	Case Type: Y2 AD	
Document Filed: Civil Complaint	Style of Case: Civil - Associate / Chapter 517 Defamation McClanahan Injunction Defendants AD	

Redaction Certification

The filer certifies that all documents in this submission for filing with the court comply with all redaction requirements of Rules 19.10, 55.025, or 84.015.

COR 2.02

The responsibility for redacting confidential information rests solely with the counsel, parties, or any other person filing the document. Courts will not review each case document to ensure compliance and will not refuse to accept or file a document on that basis.

On and after the Expanded Remote Access Implementation Date: July 1, 2023

- All redactions shall be done in a manner that makes it clear that information has been redacted. If necessary to reference the redacted information in a redacted document, filers shall use generic descriptors.
- When a filer redacts information from a document offered for filing in any court, the filer also must file a confidential redacted information filing sheet that either:
 - has the unredacted version of the document attached; or
 - sets out the information redacted from the document with an explanation referencing where the information was redacted from in the document or the generic descriptors used in the document to reference the redacted information.
- All filers shall affirmatively certify compliance with the redaction requirements in Rules 19.10, 55.025, and 84.015 when a document is filed. This certification shall be accomplished through an automated process implemented in the electronic filing system for its authorized users or, for filers who are not authorized users of the electronic filing system, by a paper form attached to the document or on the document itself.
- When a motion is filed alleging a document filed with the court contains insufficiently redacted confidential information, the clerk shall raise the document's security level to a confidential setting. The court shall dispose of the motion within 30 days. If the court determines the document is sufficiently redacted, the clerk shall reset the document's security level to allow for proper public access.

I HAVE READ AND UNDERSTAND THE ABOVE.

8/15/23
Date

Filer's Signature

NOTICE OF ENTRY
(SUPREME COURT RULE 74.03)

In The 28th Judicial Circuit Court, Vernon County, Missouri
100 W. CHERRY ST., NEVADA, MISSOURI 64772

DARRELL McCLANAHAN V ANTI DEFAMATION LEAGUE ETAL

CASE NO : 23VE-CV00534

To: File

YOU ARE HEREBY NOTIFIED that the court duly entered the following:

<u>Filing Date</u>	<u>Description</u>
16-Aug-2023	Hearing Scheduled Scheduled For: 25-Sep-2023 2:00 PM; BRANDON B FISHER; Circuit; Vernon Event Location: 100 W. Cherry St., Nevada, Mo



Clerk of Court

CC: File
DARRELL McCLANAHAN

ECC:

Date Printed : 16-Aug-2023



IN THE 28TH JUDICIAL CIRCUIT, VERNON COUNTY, MISSOURI

Judge or Division: BRANDON B FISHER	Case Number: 23VE-CV00534
Plaintiff/Petitioner: DARRELL McCLANAHAN	Plaintiff's/Petitioner's Attorney/Address:
vs.	
Defendant/Respondent: ANTI DEFAMATION LEAGUE	Date, Time and Location of Court Appearance: 25-SEP-2023, 02:00 PM
Nature of Suit: AC Misc Associate Civil-Other	Circuit 100 W. CHERRY ST. NEVADA, MO 64772

FILED

08/16/2023

CARRIE POE
CLERK, CIRCUIT COURT
VERNON COUNTY

(Date File Stamp)

Associate Division Summons

The State of Missouri to: ANTI DEFAMATION LEAGUE

Alias:

12747 OLIVE BLVD
SUITE 300
SAINT LOUIS, MO 63141

COURT SEAL OF



VERNON COUNTY

You are summoned to appear before this court on the date, time, and location above to answer the attached petition. If you fail to do so, judgment by default will be taken against you for the relief demanded in the petition. You may be permitted to file certain responsive pleadings, pursuant to chapter 517, RSMo. Should you have any questions regarding responsive pleadings in this case you should consult an attorney.

If you have a disability requiring special assistance for your court appearance, please contact the court at least 48 hours in advance of scheduled hearing.

8-16-2023

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Service must not be made less than 10 days nor more than 60 days from the date the defendant/respondent is to appear in court.

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

- delivering a copy of the summons and petition to the defendant/respondent.
- leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.
- (for service on a corporation) delivering a copy of the summons and 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).

(Seal)

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

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



IN THE 28TH JUDICIAL CIRCUIT, VERNON COUNTY, MISSOURI

Judge or Division: BRANDON B FISHER	Case Number: 23VE-CV00534	<div style="border: 2px solid black; border-radius: 15px; padding: 10px;"> <p>FILED</p> <p>08/16/2023</p> <hr/> <p>CARRIE POE CLERK, CIRCUIT COURT VERNON COUNTY</p> <p>(Date File Stamp)</p> </div>
Plaintiff/Petitioner: DARRELL McCLANAHAN	Plaintiff's/Petitioner's Attorney/Address:	
vs.	Date, Time and Location of Court Appearance: 25-SEP-2023, 02:00 PM	
Defendant/Respondent: ANTI DEFAMATION LEAGUE	Circuit 100 W. CHERRY ST. NEVADA, MO 64772	
Nature of Suit: AC Misc Associate Civil-Other		

Associate Division Summons

The State of Missouri to: **JOHN DOE**
Alias:

12747 OLIVE BLVD
SUITE 300
SAINT LOUIS, MO 63141

You are summoned to appear before this court on the date, time, and location above to answer the attached petition. If you fail to do so, judgment by default will be taken against you for the relief demanded in the petition. You may be permitted to file certain responsive pleadings, pursuant to chapter 517, RSMo. Should you have any questions regarding responsive pleadings in this case you should consult an attorney.

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8-16-2023
Date

Clerk

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- leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.
- (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).
- other: _____

Served at _____ (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).

(Seal)

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees, if applicable

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

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



IN THE 28TH JUDICIAL CIRCUIT, VERNON COUNTY, MISSOURI

Judge or Division: BRANDON B FISHER	Case Number: 23VE-CV00534
Plaintiff/Petitioner: DARRELL McCLANAHAN	Plaintiff's/Petitioner's Attorney/Address:
vs.	
Defendant/Respondent: ANTI DEFAMATION LEAGUE	Date, Time and Location of Court Appearance 25-SEP-2023, 02:00 PM
Nature of Suit: AC Misc Associate Civil-Other	Circuit 100 W. CHERRY ST. NEVADA, MO 64772

FILED

08/16/2023

CARRIE POE
CLERK, CIRCUIT COURT
VERNON COUNTY

(Date File Stamp)

Associate Division Summons

The State of Missouri to: JONATHAN GREENBLATT

Alias:

12747 OLIVE BLVD
SUITE 300
SAINT LOUIS, MO 63141

COURT SEAL OF



VERNON COUNTY

You are summoned to appear before this court on the date, time, and location above to answer the attached petition. If you fail to do so, judgment by default will be taken against you for the relief demanded in the petition. You may be permitted to file certain responsive pleadings, pursuant to chapter 517, RSMo. Should you have any questions regarding responsive pleadings in this case you should consult an attorney.

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8-16-2023

Date

Clerk

Further Information:

Sheriff's or Server's Return

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- leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.
- (for service on a corporation) delivering a copy of the summons and 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).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

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

231

Return
SB
9-21-23



IN THE 28TH JUDICIAL CIRCUIT, VERNON COUNTY, MISSOURI

Judge or Division: BRANDON B FISHER	Case Number: 23VE-CV00534
Plaintiff/Petitioner: DARRELL McCLANAHAN	Plaintiff's/Petitioner's Attorney/Address:
vs.	
Defendant/Respondent: ANTI DEFAMATION LEAGUE	Date, Time and Location of Court Appearance: 25-SEP-2023, 02:00 PM
Nature of Suit: AC Misc Associate Civil-Other	Circuit 100 W. CHERRY ST. NEVADA, MO 64772

FILED
08/16/2023
CARRIE POE
CLERK, CIRCUIT COURT
VERNON COUNTY
(Date File Stamp)

Associate Division Summons

The State of Missouri to: ANTI DEFAMATION LEAGUE
Alias:

12747 OLIVE BLVD
SUITE 300
SAINT LOUIS, MO 63141
Comp Creations
COURT SEAL OF

VERNON COUNTY

12 DEPOS MW

You are summoned to appear before this court on the date, time, and location above to answer the attached petition. If you fail to do so, judgment by default will be taken against you for the relief demanded in the petition. You may be permitted to file certain responsive pleadings, pursuant to chapter 517, RSMo. Should you have any questions regarding responsive pleadings in this case you should consult an attorney.

If you have a disability requiring special assistance for your court appearance, please contact the court at least 48 hours in advance of scheduled hearing.

8-16-2023 Date
Carrie Poe Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Service must not be made less than 10 days nor more than 60 days from the date the defendant/respondent is to appear in court.

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

delivering a copy of the summons and petition to the defendant/respondent.

leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

(for service on a corporation) delivering a copy of the summons and petition to: Melissa (name) Receptionist (title).

other: _____

Served at 12747 Olive #300 (address) in St Louis (County/City of St. Louis), MO, on 8/23/23 (date) at 0800 (time).

Scott DePolito Printed Name of Sheriff or Server
[Signature] 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).
(Seal) My commission expires: _____ Date _____ Notary Public _____

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

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

WJH 8-22-23

23-ADSM-16788

Electronically Filed - VERNON - August 25, 2023 - 10:17 AM

236

Return
SB
9-21-23



IN THE 28TH JUDICIAL CIRCUIT, VERNON COUNTY, MISSOURI

FILED
08/16/2023
CARRIE POE
CLERK, CIRCUIT COURT
VERNON COUNTY

Judge or Division: BRANDON B FISHER	Case Number: 23VE-CV00534
Plaintiff/Petitioner: DARRELL McCLANAHAN	Plaintiff's/Petitioner's Attorney/Address:
vs.	
Defendant/Respondent: ANTI DEFAMATION LEAGUE	Date, Time and Location of Court Appearance: 25-SEP-2023, 02:00 PM
Nature of Suit: AC Misc Associate Civil-Other	Circuit 100 W. CHERRY ST. NEVADA, MO 64772

(Date File Stamp)

Associate Division Summons

The State of Missouri to: **JOHN DOE**
Alias:
12747 OLIVE BLVD
SUITE 300
SAINT LOUIS, MO 63141

12 DEPOS W



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8-16-2023
Date

Carrie Poe
Clerk

Further Information:

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- delivering a copy of the summons and petition to the defendant/respondent.
- leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with a person at least 18 years of age residing therein.
- (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).

other: Non Est - Unknown At Address Given 8/23/23 0800 (address) in _____ (time).
Served at _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Scott DeBlasio
Printed Name of Sheriff or Server

[Signature]
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).

(Seal)

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees, if applicable

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

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

WMM
8-22-23

23-ADSM-16789

239

Return
SB
9-21-23



IN THE 28TH JUDICIAL CIRCUIT, VERNON COUNTY, MISSOURI

Judge or Division: BRANDON B FISHER	Case Number: 23VE-CV00534
Plaintiff/Petitioner: DARRELL McCLANAHAN	Plaintiff's/Petitioner's Attorney/Address:
vs.	
Defendant/Respondent: ANTI DEFAMATION LEAGUE	Date, Time and Location of Court Appearance 25-SEP-2023, 02:00 PM
Nature of Suit: AC Misc Associate Civil-Other	Circuit 100 W. CHERRY ST. NEVADA, MO 64772

FILED

08/16/2023

CARRIE POE
CLERK, CIRCUIT COURT
VERNON COUNTY

(Date File Stamp)

Associate Division Summons

The State of Missouri to: **JONATHAN GREENBLATT**

Alias:

12747 OLIVE BLVD
SUITE 300
SAINT LOUIS, MO 63141

12 DEPOS W

COURT SEAL OF



VERNON COUNTY

You are summoned to appear before this court on the date, time, and location above to answer the attached petition. If you fail to do so, judgment by default will be taken against you for the relief demanded in the petition. You may be permitted to file certain responsive pleadings, pursuant to chapter 517, RSMo. Should you have any questions regarding responsive pleadings in this case you should consult an attorney.

If you have a disability requiring special assistance for your court appearance, please contact the court at least 48 hours in advance of scheduled hearing.

8-16-2023

Date

Carrie Poe

Clerk

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- leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with a person at least 18 years of age residing therein.
- (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).

other: Non Est - Unknown At Address Given 8/23/23 0800 _____ (address) in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Scott DePoli

Printed Name of Sheriff or Server

[Signature]

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).

(Seal)

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

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

WJL 8-22-23

23-ADSM-16787

IN THE CIRCUIT COURT OF VERNON COUNTY, MISSOURI
28TH JUDICIAL CIRCUIT

DARRELL MCCLANAHAN)	
)	
Plaintiff,)	
)	Case No. 23VE-CV00534
vs.)	
)	
ANTI-DEFAMATION LEAGUE, et al.)	
)	
Defendant.)	

ENTRY OF APPEARANCE

COMES NOW Matthew D. Ampleman, of the law firm Dowd Bennett LLP, and enters his appearance on behalf of Defendant Anti-Defamation League in the above-captioned action.

Dated: September 20, 2023

Respectfully submitted,

DOWD BENNETT LLP

By: /s/ Matt D. Ampleman
Matt D. Ampleman, #69938MO
7676 Forsyth Blvd., Suite 1900
St. Louis, Missouri 63105
(314) 889-7300 (telephone)
(314) 863-2111 (facsimile)
mampleman@dowdbennett.com

Attorney for Defendant Anti-Defamation League

CERTIFICATE OF SERVICE

The undersigned certifies that on September 20, 2023, a true and correct copy of the foregoing was electronically filed using the Court’s electronic filing system as well as emailed and

mailed by FedEx to pro se Plaintiff Darrell McClanahan at the address and email address provided
in the Petition:

Darrell McClanahan
24346 S. 2425 Rd.
Milo, MO
amlove555@gmail.com

/s/ Matt D. Ampleman

IN THE CIRCUIT COURT OF VERNON COUNTY, MISSOURI

DARRELL MCCLANAHAN,)	
)	
Plaintiff,)	
)	Case No. 23VE-CV00534
vs.)	
)	
ANTI-DEFAMATION LEAGUE, et al.)	
)	
Defendants.)	

**MOTION TO VACATE HEARING
SET FOR SEPTEMBER 25, 2023, AND SUGGESTIONS IN SUPPORT**

Defendant Anti-Defamation League (“ADL”), through its attorneys, hereby moves for the hearing set in this matter for September 25, 2023, to be vacated, and in support states the following:

1. On August 16, 2023, Plaintiff Darrell McClanahan, a self-described “Pro-White man, horseman, politician, political prisoner-activists who is dedicated to traditional Christian values,” Pet. ¶ 1, filed a petition against ADL, its CEO Jonathan Greenblatt, and three Doe defendants, claiming he has been defamed by an article allegedly published by ADL regarding Plaintiff’s candidacy for one of Missouri’s U.S. Senate seats. The Complaint seeks \$150,000 in compensatory damages, \$5,000,000 in punitive damages, and a permanent injunction against ADL. *Id.* at 7.

2. The parties are completely diverse in this matter, as McClanahan is a citizen of Missouri, and none of the named Defendants are citizens of Missouri. *Id.* ¶ 4.

3. McClanahan seeks more than \$75,000 through this action. *Id.* at 7.

4. Accordingly, under 28 U.S.C. §§ 1332 and 1441(b), Defendant ADL will remove this matter to the United States District Court for the Western District of Missouri on or before September 25, 2023.

5. Under 28 U.S.C. § 1446, “once removal has been procedurally effected, any subsequent state action is void, even if it turns out the case was removed improperly.” *State ex rel. Nixon v. Moore*, 108 S.W.3d 813, 816 (Mo. Ct. App. 2003) (citing *Ward v. Resolution Trust Corp.*, C.A.8 (Ark.) 1992, 972 F.2d 196, 198 (8th Cir.1992), *cert. denied* 507 U.S. 971 (1993); *Cavanagh v. Cavanagh*, 380 A.2d 964, 967 (1977)).

6. For these reasons—and because any case schedule set on September 25, 2023, would need to be vacated and rescheduled pending the outcome and length of removal—Plaintiff respectfully requests that the hearing set in this matter for September 25, 2023, be vacated.

7. In the alternative, Defendant ADL requests that the September 25, 2023, conference be held telephonically or, at a minimum, that ADL be permitted to appear telephonically.

Dated: September 20, 2023

Respectfully submitted,

DOWD BENNETT LLP

By: /s/ Matt D. Ampleman

J. Russell Jackson, #65689MO
 Matt D. Ampleman, #69938MO
 7676 Forsyth Blvd., Suite 1900
 St. Louis, Missouri 63105
 (314) 889-7300 (telephone)
 (314) 863-2111 (facsimile)
 rjackson@dowdbennett.com
 mampleman@dowdbennett.com

*Attorneys for Defendant Anti-Defamation
 League*

CERTIFICATE OF SERVICE

The undersigned certifies that on September 20, 2023, a true and correct copy of the foregoing was electronically filed using the Court’s electronic filing system as well as emailed

and mailed by FedEx to pro se Plaintiff Darrell McClanahan at the address and email address provided in the Petition:

Darrell McClanahan
24346 S. 2425 Rd.
Milo, MO
amlove555@gmail.com

/s/ Matt D. Ampleman

IN THE CIRCUIT COURT OF VERNON COUNTY, MISSOURI

DARRELL MCCLANAHAN,)	
)	
Plaintiff,)	
)	Case No. 23VE-CV00534
vs.)	
)	
ANTI-DEFAMATION LEAGUE, et al.)	
)	
Defendants.)	

ENTRY OF APPEARANCE

COMES NOW J. Russel Jackson, of the law firm Dowd Bennett LLP, and enters his appearance on behalf of Defendant Anti-Defamation League in the above-captioned action.

Dated: September 20, 2023

Respectfully submitted,

DOWD BENNETT LLP

By: /s/ J. Russell Jackson
 J. Russell Jackson #65689MO
 7676 Forsyth Blvd., Suite 1900
 St. Louis, Missouri 63105
 (314) 889-7300 (telephone)
 (314) 863-2111 (facsimile)
 rjackson@dowdbennett.com

Attorney for Defendant Anti-Defamation League

CERTIFICATE OF SERVICE

The undersigned certifies that on September 20, 2023, a true and correct copy of the foregoing was electronically filed using the Court’s electronic filing system as well as emailed and mailed by FedEx to pro se Plaintiff Darrell McClanahan at the address and email address provided in the Petition:

Darrell McClanahan
24346 S. 2425 Rd.
Milo, MO
amlove555@gmail.com

/s/ J. Russell Jackson