

IN THE CIRCUIT COURT OF BUCHANAN COUNTY, MISSOURI

**BRIAN KIRK,**

**Plaintiff,**

**v.**

**CITY OF ST. JOSEPH, MISSOURI,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

**MAYOR JOHN JOSENDALE,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

**MARTY NOVAK,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

**TAYLOR CROUSE,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

**ANDY TROUT,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

**MICHAEL GRIMM,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

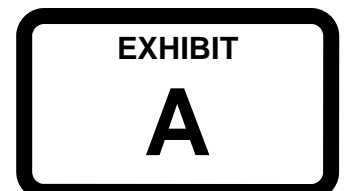
**MADISON DAVIS,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

**KENTON RANDOLPH,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

Case No. \_\_\_\_\_



**JEFF SCHOMBURG,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

**RANDY SCHULZ,**

*Serve:* City Clerk, Paula Heyde  
1100 Frederick Avenue  
St. Joseph. Missouri 64501

**JOSH BLEVINS**

*Serve:* Josh Blevins  
1002 Leonard Road  
St. Joseph. Missouri 64506

**STEVE GREIERT**

*Serve:* Steve Greiert  
4408 Graystone Drive  
St. Joseph. Missouri 64505

**Defendants.**

**PETITION FOR DAMAGES AND EQUITABLE RELIEF**

Plaintiff, Brian Kirk, for his case of action against Defendants, states the following:

**Summary of Action**

1. Plaintiff joined the St. Joseph Public Library Board of Trustees in late 2019, which is a nine-member group of volunteers that oversees financial and administrative matters of the St. Joseph Library. On June 20, 2023, Brian Kirk met with the library director, Mary Beth Revels, and the Mayor of St. Joseph Missouri. Mayor Josendale told Plaintiff, "People are concerned about woke ideology spreading and too many pride flags in our downtown." Four days later Mayor Josendale rescinded his nomination of the Plaintiff and subsequently voted in opposition to the Plaintiff to serve another term on the Library Board of Trustees. Ultimately, Plaintiff was removed due to his speech of support of the LGBTQ+ community, his religious speech, and because he is an openly gay pastor.

2. The actions of these government officials, those acting as government agents, the policies, and practices of the City of St. Joseph that facilitate these actions, violate Plaintiff's Constitutional right to engage in free speech without retaliation and to equal protection. These Constitutional violations have caused Plaintiff injuries redressable under 42 U.S.C. § 1983, including loss of free speech and emotional distress. Plaintiff's action is filed to recover damages for those injuries and to procure injunctive relief to prevent future recurrence of these violations.

### **Parties**

3. Plaintiff, Brian Kirk, is a resident of Buchanan County, Missouri, and during all times relevant to the causes of action pleaded here, he has lived within the City of St. Joseph, Missouri.

4. Defendant Mayor John Josendale is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Josendale is the Mayor of St. Joseph, Missouri, and a member of the governmental body, St. Joseph City Council. This action is filed against Defendant Josendale in his official capacity.

5. Defendant Marty Novak is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Novak is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Novak in his official capacity.

6. Defendant Taylor Crouse is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Crouse is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Crouse in his official capacity.

7. Defendant Andy Trout is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Trout is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Trout in his official capacity.

8. Defendant Michael Grimm is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Grimm is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Grimm in his official capacity.

9. Defendant Madison Davis is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Davis is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Davis in her official capacity.

10. Defendant Kenton Randolph is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Randolph is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Randolph in his official capacity.

11. Defendant Jeff Schomburg is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Schomburg is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Schomburg in his official capacity.

12. Defendant Randy Schulz is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Schulz is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Schulz in his official capacity.

13. Defendant Marty Novak is an individual who is a citizen of the City of St. Joseph in the state of Missouri. Defendant Novak is a member of the governmental body, the St. Joseph City Council. This action is filed against Defendant Novak in his official capacity.

14. Defendant Josh Blevins is an individual who is a citizen of the City of St. Joseph in the state of Missouri.

15. Defendant Steven Greiert is an individual who is a citizen of the City of St. Joseph in the state of Missouri.

16. Defendants St. Joseph City Council are hereafter referred to as "City Council."

### **Jurisdiction and Venue**

17. This Court has subject matter jurisdiction pursuant to Mo. Const. art. 1, §2 §8 and §10 as this is a civil action arising under the Missouri Constitution and the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution and the First Amendment of the United States Constitution, through 42 U.S.C. Section 1983.

18. This Court has personal jurisdiction over all Defendants in this case because all parties are domiciled within the city limits of St. Joseph in the State of Missouri and all the events giving rise to the claims occurred in the City limits of St. Joseph State of Missouri.

19. Venue is proper with this Court pursuant to RSMo. § 508.010 because the events giving rise to Plaintiff's claims arose in Buchanan County Missouri.

### **Background Facts Common to All Counts**

20. Plaintiff is a Pastor who identifies as a gay male.
21. Plaintiff has a Facebook page showing support for the LGBTQ+ community.
22. Following are the Plaintiff's Facebook posts relevant to this lawsuit:

**Brian Kirk**  
June 1 · 🌐

Every time a person derisively asks, "Why do you people need a pride month?" they've answered their own question. When you stop asking that, it will be the beginning of the end of the need for pride month. Until then...Happy Pride everyone.



👍❤️🥰 55 1 comment 8 shares

👍 Like 🔄 Share

**Hazel Kirk**  
So important for each person to know they are a beloved child of God. ...

26w Like



First Christian Church - St. Joseph, MO  
June 3 · 🌐

It's happening! Things are getting ready for tonight's Queer Revival event in our sanctuary. There's still time to plan to join us! Pre-gathering 6:30. Performances at 7:30 pm.

23. In early 2019, the St. Joseph Library (“Library”) had a Drag Queen story hour. As a result of that Drag Queen story hour some in the St. Joseph community protested the event online. Because of those protests some St. Joseph Library Board members (“Library Board”) resigned.

24. After the Library Board resignations, Plaintiff was nominated by Defendant Josen- dale and elected by the St. Joseph City Council (“City Council”) as a member of the nine-member Library Board in late 2019.

25. As a Library Board member Plaintiff was assigned to oversee the financial health of the Library.

26. Plaintiff had no involvement in choosing the types of books the Library would carry, hosting events at the Library, or generally overseeing the operational management of the Library.

27. Plaintiff served quiet three years preceding June 19, 2023, until Defendant Blevins wrote a template email to the Defendants, St. Joseph City Council members, demanding Plaintiff was not reappointed to the board. That letter is attached as **Exhibit A**.

28. Defendant Blevins is the Senior Pastor of Grace Calvary Chapel, which is a tax exempt 501(c)(3) religious institution located at 5104 South 50<sup>th</sup> Street in St. Joseph, Missouri 64507.

29. Defendant Blevins held a sermon on June 25, 2023, where he preached:

- a. “Last week I wrote a letter to or City Council, discouraging them from nominating Brian Kirk, the Pastor at First Christian Church in St. Joseph, for the role of Vice President for the St. Joseph Public Library Board of directors. I was not alone in this but for some reason someone decided to shine the spotlight on me. And so, I posted something online and I sent this letter asking for his removal based on legitimate concerns about his position as an influencer in our public spaces, our taxpayer funded libraries. Brian Kirk is an outspoken advocate for the LGBTQ movement in St. Joseph, last I check a board member of P flag, I don’t know if that’s how you say it. Which is a gay rights association with a very public and blatant mission to bring the LGBTQ agenda to every sphere of our city’s culture. P Flag sponsored the drag queen reading hour in 2019 at the St. Joseph Public Library and openly advocates for gender affirming care, also known as mutilative irreversible surgery, to be available to every age of



transgender people. Brian has spoke in LGBTQ issues at least one of our high schools. His church has held queer revival events with the slogan queerness is next to godliness and has had at least one drag queen showing promoting LGBTQ at his church.....”

30. Defendant Blevins is also the founder of Votestjoe.com which is a political advocacy website that advocates for placing Christian Nationalist in positions of political power in the City of St. Joseph Missouri.

31. Following are excerpts from his website, Votestjoe.com:

- a. “Many people of faith make the mistake of leaving their faith outside the voting booth. Rather, our faith ought to inform our decisions at the polls. As followers of God, we must always ask ourselves, "How can I love God and love my neighbor through my vote?" There's no perfect answer in this fallen world, but we can do everything within our God given rights to stand for righteousness in this world.”

32. On February 7, 2022, Defendant Blevins posted to his YouTube Channel “The Shepard’s Voice w/ Pastor Josh Bevins”, “I want to talk about two words that many people avoid mentioning in the same sentence, faith, and politics. For far too long in our country we’ve been conditioned to believe that those two realms cannot be intertwined. Now I want to say it’s certainly been true that throughout history an unhealthy mingling of those two things has led to societal damage, but that doesn’t mean that we shouldn’t ty to tackle these issues biblically and as thoughtfully as we can as Christians...”, “Consider this carefully and prayerfully and ask the Lord how he might have you love those around you by stewarding your vote or your political involvement.”

33. On June 16, 2023, Defendant Josendale nominated Plaintiff to serve as a member of the Library Board with his term to end June 26, 2026.

34. On June 20, 2023, Defendant Blevins posted the following on his personal Facebook page:

**Josh Blevins**  
June 20 · 🌐

Hello friends,

As many of you know, our city council is voting on Monday, June 26, to confirm a nominee for the public library board named Brian Kirk. Brian is outspoken as an open and affirming pastor who celebrates the LGBTQ movement and lifestyle. His appointment to a post that directly impacts our youngest and most vulnerable minds should be a deep concern for any resident who wants to keep our libraries as centers for unbiased learning. We don't want our public libraries to become indoctrination centers for the LGBTQ movement.


I have written a letter to our council and am encouraging everyone to attend the meeting on Monday, June 26, at City Hall to respectfully and courageously voice your concerns and opposition to Brian's appointment. Thank you, and let's continue to fight for the protection of the young minds in our community!

Pastor Josh

---

**Kirk**  
🌐

person derisively asks, "Why a pride month?" they've answered. When you stop asking that, the beginning of the end of the need for a happy Pride everyone.




**Brian Kirk**  
Progressive Christian, Trekkie, comic book & Star wars fan, dachshund owner, vegetarian human.

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**First Christian Church - St. Joseph, MO**  
Follow  
Jun 3 · 🌐

It's happening! Things are getting ready for tonight's Queer Revival event in our sanctuary. There's still time to plan to join us! Pre... See more



👍❤️😬 155      419 comments   66 shares

👍 Like      💬 Comment      ➦ Share      🌐

35. Just four days later, on June 20, 2023, the same day Defendant Blevins posted the above-mentioned Facebook post, Defendant Josendale met with Plaintiff and the Library Director Mary Beth Revels and rescinded his nomination saying, “I’m sorry. I respect you. I think you’ve done a great job. I just don’t want this controversy. And I think that the best way to not hurt you, not hurt the library, not hurt the city, is to just stop right here,” “it’s just causing conflict in the city.”, “And for your protection and your church’s protection, I’m going to go ahead and take you off the board,”, and “people are concerned about woke ideology spreading and too many Pride flags in our downtown.”

36. After Defendant Blevins advocated for the removal and non-appointment of Plaintiff, City Council members were inundated with emails from the St. Joseph community demanding Plaintiff’s removal of the Library Board.

37. Following are excerpts from the above-mentioned emails:

- a. On June 19, 2023, St. Joseph citizen, Mary Carter, wrote to Defendant Novak, “I believe that Drag Queen story hour is akin to grooming and mild pornography.”
- b. On June 20, 2023, St. Joseph citizen, Steven Greiret, wrote to Defendant Randolph, “This transgender and homosexual propaganda is pure evil. It is designed to destroy the family, to undercut traditional American values and our way of life, and ultimately to institute governmental control that will undermine our city, county, state, and nation.”
- a. On June 30, 2023, St. Joseph citizen, and media director of Grace Calvary Chapel, Jeremy Sharp, wrote to Defendant Crouse “through research into the candidate’s public social media, Brian clearly intends to use his platforms to bolster the LGBTQ+ movement and disseminate its agenda within

our city.” Defendant Crouse responded, “I have grave reservations based on his social media. You can count on me to the right thing!”

- b. On June 19, 2023, St. Joseph citizen, John Mosiman, wrote to Defendant Trout, “I believe that his views that he has made public on social media are not representative of the people of St. Joseph. I believe his views are harmful and destructive to the children of our city.” Defendant Trout responded, “I concur.”
- c. On June 21, 2023, St. Joseph citizen, Beth Ledford, wrote to Defendant Joesendale, “I don’t believe that we need such diversity in our libraries. I don’t support our (sic) encourage the current politics on sexual diversity, or gender diversity, which seems to be socially driven.”
- d. On June 21, 2023, St. Joseph citizen, Kristopher Miller, wrote to Defendant Davis, “It has come to my attention we are looking to bring onto the library council a man who has more than skeletons in his closet, but a pastor who may be wanting children in his closet too. Where are you on voting this progressive pastor onto the library council?”
- e. On June 19, 2023, St. Joseph citizen, Mistie Carver, wrote to Defendant Grimm, “We should not be giving a man who openly encourages and promotes the sexualization of children another term on our library board. By once again placing him in this position it will no doubt open up our children to MORE Drag Queen Story Hours and subject our children to MORE pornographic material in the form of certain books like...” Defendant Grimm responded, “I can assure you that I agree completely with you and I will be voting no next Monday night.”

f. On June 23, 2023, The St. Joseph Tea Party, wrote to Defendant City Council Members and Defendant Josendale, “We are sick and tired of the Marxist, demonic, woke MOB trying to BULLY everyone into accepting and embracing this GODLESS perversion at every turn no matter where we go. We will not stand for it any longer. We SUPPORT Pastor Josh Blevens and Grace Calvary Chapel.”

38. Defendant Blevins acted as an agent of the City of St. Joseph when he deeply advocated and influenced the Defendant Council Members and Josendale.

39. Defendant Greiert was the Buchanan County Republic Central Committee Chair.

40. On August 4, 2023, Defendant Greiert wrote to the Defendant Mayor and Defendant City Council members stating that if city council members vote to advance the Plaintiff’s reappointment, the Republican Party would not accept filing fees from them in the future if they run for other Republican positions” and “You and the other City Council members can always run as Democrats, Independents, Libertarians, or pedestrians or anything else without our approval, but you will need our endorsement before you can run as Republicans for anything anywhere.”

41. Defendant Greiert acted as an agent of the City of St. Joseph when he deeply advocated and influenced the Defendant Council Members and Josendale.

42. On Monday, June 26, 2023, the City Council held a meeting to decide whether Plaintiff should be approved to serve another term on the Library Board.

43. Subsequently, on August 21, 2023, Defendants Mayor Josendale and City Council members voted to not reappoint the Plaintiff because of his protected speech.

**Count I**  
**Violation of the First Amendment and Equal Protection Clause of the Fourteenth Amendment Under 42 U.S.C. § 1983**  
**(All Defendants)**

44. Plaintiff incorporates all foregoing paragraphs as if fully set forth herein.

45. Defendants are “persons” within the meaning of 42 U.S.C. § 1983.

46. Defendants’ decision to conspire and terminate Plaintiff’s Library Board Position had the effect of chilling his speech and violated the First Amendment in at least three ways: (i) as an unconstitutional restriction to a public forum; (ii) as unconstitutional content-and viewpoint-based discrimination; and (iii) as a violation of Plaintiff’s right to speak to matters of public interest and violated Plaintiff’s Fourteenth Amendment right to equal protection under the law. Plaintiff is being denied equal protection because of his sex and sexual orientation.

47. Defendants have adopted municipal policies, practices, and customs that have caused the violations complained of herein; and, in the alternative, have actual or constructive notice of the constitutional violations described herein and have failed to take action, thereby allowing the continuation of such a policy or custom, and causing the harms complained of herein.

48. Defendants acted under color of state law when they deprived Plaintiff of his right to free speech.

49. Defendants’ actions against Plaintiff were substantially motivated by Plaintiff’s engagement in First Amendment protected activity. The Defendants engaged in a deliberate effort to deter future similar activity, which demonstrates a pattern and practice of unconstitutional conduct that is certain to continue to absent any relief.

50. The above-described conduct was, and continues to be, a proximate cause of Plaintiff’s enduring pain and suffering and has chilled his desire to participate in future speech in a public forum regarding matters of police conduct. These violations of the First Amendment and Fourteenth Amendment are also continuing and causing irreparable harm.

51. The Defendants engaged in their conduct intentionally, knowingly, willfully, wantonly, maliciously, and in reckless disregard of Plaintiff's constitutional rights, and are therefore liable to Plaintiff for punitive damages.

**Count II**  
**First and Fourteenth Amendment Retaliation Under 42 U.S.C. § 1983**  
**(All Defendants)**

52. Plaintiff incorporates all foregoing paragraphs as if fully set forth herein.

53. Plaintiff engaged in speech protected under the First Amendment and is entitled to equal protection for:

- a. Being openly gay.
- b. Posting the above referenced Facebook support for the gay community.

54. Defendants responded to Plaintiff's constitutionally protected activity by retaliating against him, including rescinding the nomination to the Library Board.

55. By engaging in the alleged conduct Defendants sought to punish Plaintiff for exercising his First and Fourteenth Amendment rights, to silence him, and deter him from posting support for the gay community in the future.

56. Defendants' retaliatory actions were substantially motivated by Plaintiff's exercise of his First and Fourteenth Amendment rights and the content and viewpoint expressed in his speech.

57. The chronology of the events demonstrates a causal connection between Plaintiff's protected speech and protected status and the Defendants' actions to chill that particular speech and other similar speech. But for Plaintiff's Facebook posts and being openly gay, Defendants would never have rescinded his Library Board nomination.



58. Plaintiff has a clearly established right under the First and Fourteenth Amendment not to suffer retaliation for engaging in protected free speech and for being a male member of the gay community. Any reasonable government official and government agent knows of this clearly established right.

59. Defendants' intentional actions as described herein deliberately deprived Plaintiff of rights, privileges, liberties, and immunities secured by the Constitution of the United States.

60. Defendants' custom, policy and practice of retaliating against Library Board Members who exercise their First and Fourteenth Amendment right to free speech, including supporting the LGBTQ+ community, is not a reasonable regulation of constitutionally protected activities.

61. Defendants acted under color of state law when they deprived Plaintiff of his right to free speech and equal protection.

62. The above-described conduct was, and continues to be, a proximate cause of Plaintiff's enduring pain and suffering and has chilled his desire to participate in future speech in a public forum. These violations of the First and Fourteenth Amendment are also continuing and causing irreparable harm.

63. The Defendants engaged in their conduct intentionally, knowingly, willfully, wantonly, maliciously, and in reckless disregard of Plaintiff's constitutional rights, and are therefore liable to Plaintiff for punitive damages.

**Count III**  
**Conspiracy to Violate Constitutional Rights Under 42 U.S.C. §§ 1983 and 1985**  
**(All Defendants)**

64. Plaintiff incorporates all foregoing paragraphs as if fully set forth herein.

65. With a meeting of the minds for an unlawful objective, all Defendants acted in concert to deny Plaintiff his constitutional rights.

66. Plaintiff was thereby injured and deprived of the ability to exercise his Constitutional right to equal protection and free speech and religion.

67. The above-described conduct was, and continues to be, a proximate cause of Plaintiff's enduring pain and suffering and has chilled his desire to participate in future speech in a public forum. These violations of the First and Fourteenth Amendments are also continuing and causing irreparable harm.

68. The Defendants engaged in their conduct intentionally, knowingly, willfully, wantonly, maliciously, and in reckless disregard of Plaintiff's constitutional rights, and are therefore liable to Plaintiff for punitive damages.

**Count IV**  
**Equal Protection**  
**(Against Defendants City of St. Joseph, Mayor Josendale, and City Council Members)**

69. Plaintiff incorporates all foregoing paragraphs as if fully set forth herein.

70. Defendants City of St. Joseph, Mayor Josendale and Defendant Councilmembers were acting under color of law as elected government officials.

71. There was no rational basis for Defendants to refuse to reappoint Plaintiff to the Library Board.

72. There was no rational basis for the Defendants to oppose Plaintiff's support of the LGBTQ+ community.

73. Defendants' conduct was deliberately indifferent to the Constitutional rights of the Plaintiff.

74. The above-described conduct was, and continues to be, a direct and proximate cause of Plaintiff's enduring pain and suffering. These violations of the First and Fourteenth Amendments are also continuing and causing irreparable harm.

75. The Defendants engaged in their conduct intentionally, knowingly, willfully, wantonly, maliciously, and in reckless disregard of Plaintiff's constitutional rights, and are therefore liable to Plaintiff for punitive damages.

**Count V**  
**Grounds for Injunctive Relief**

76. Plaintiff incorporates all foregoing paragraphs as if fully set forth herein.

77. The Plaintiff is a citizen of St. Joseph, Missouri.

78. As alleged above, Plaintiff has suffered irreparable injuries by the acts of The Defendants. This conduct is likely to continue and threatens future harm to Plaintiff and other members of the community.

**Relief Requested**

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against each of the Defendants, and award him all relief allowed by law or equity, including but not limited to the following:

1. Recovery of damages, including economic losses on all claims as allowed by law; compensatory and consequential damages, including damages for emotional distress, humiliation, loss of enjoyment of life, and other pain and suffering on all claims allowed by law in an amount to be determined at trial; punitive damages on all claims allowed by law and in an amount to be determined at trial; attorneys' fees and the costs associated with this action, on all claims allowed by law under §1983; and pre-and post-judgment interest at the lawful rate.
2. Injunctive relief, including:
  - a. Mandated adoption of a formal written policy by the St. Joseph City Council members that will instruct City Council members on the appropriate

- qualifications when deciding all future Board nominations to exclude violating the constitutional rights of all citizens who apply or are nominated for Board positions; and
- b. Rescission of Grace Calvary Tax Exempt status
3. All other appropriate relief in law or equity as the Court may deem just and proper in the circumstances.

**Demand for a Jury Trial**

Plaintiff hereby demands a trial by jury on all claims and issues so triable.

Respectfully submitted,

**BRATCHER GOCKEL LAW, L.C.**

/s/Lynne Jaben Bratcher  
Lynne Jaben Bratcher, Mo. Bar No.: 31203  
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**WYRSCH HOBBS & MIRAKIAN P.C.**

/s/Sarah J. Duggan  
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*ATTORNEYS FOR PLAINTIFF*

Downloaded from [https://votestjoe.com/library-board/?fbclid=IwAR19qDXI45xJRkZR\\_Af1KqAPbkGMIZF1n5z1HpeLzvEDimrIvAgUG9IXjfc](https://votestjoe.com/library-board/?fbclid=IwAR19qDXI45xJRkZR_Af1KqAPbkGMIZF1n5z1HpeLzvEDimrIvAgUG9IXjfc) on June 21, 2023.

# Request to Block Nomination of Brian Kirk to the Library Board

- [Letter to St. Joseph City Council](#)
- 

Dear City Council Members,

I hope this letter finds you well and encouraged as you continue to serve our city. I am writing to you as a concerned citizen of Saint Joseph to express my deep reservations regarding the nomination of Brian Kirk to the Library Board. I kindly request your attention and consideration to carefully evaluate the potential implications of this appointment.

First and foremost, I want to emphasize my unwavering support for the mission and values of our public library system. It serves as a vital institution that fosters community engagement, knowledge dissemination, and intellectual growth. I believe it is crucial for the Public Library Board to consist of individuals who share a genuine commitment to preserving the library's neutrality and maintaining its role as a beacon of intellectual freedom.

While I acknowledge that Brian Kirk may possess commendable qualifications, I am deeply concerned about the potential influence of their ideological agenda on the library's platform. Through research into the candidate's public social media, Brian clearly intends to use his platforms to bolster the LGBTQ+ movement and agenda within our city. Considering how many libraries around America have turned ideological centers concerned with the indoctrination of LGBTQ ideas and agendas, I do not believe it is unfounded to have concerns that Brian may use his post to further that specific agenda through Saint Joseph Libraries.

Allow me to highlight a few areas of concern that members of our community have brought to my attention:

1. **Neutrality and Intellectual Freedom:** The public library should remain a neutral space that respects diverse perspectives and encourages open dialogue. Introducing a board member with a clear social and political agenda could compromise the library's commitment to intellectual freedom, leading to potential bias in programming and resource allocation.
2. **Community Cohesion:** Libraries have traditionally played a unifying role in our community by providing services and programs that cater to the interests and needs of all residents, regardless of their political affiliations. The inclusion of an individual with a specific ideological



agenda might polarize the library's offerings, alienating a portion of the community and undermining its ability to serve as a safe space for all.

3. Public Perception: The library's reputation as a trusted institution may be at stake if the perception arises that it has become a platform for advancing narrow interests. The library must maintain its reputation as an unbiased and trusted resource hub.
4. Moral fortitude: While everyone in our great nation has the freedom to believe as they desire and maintain the right to free speech, placing someone so clearly biased in a role that directly impacts our most vulnerable population (young children) could prove damaging. Statistically, most Americans (and Missourians) do not want sexualized agendas pushed in our public outlets such as schools and libraries. With the modern trend of LGBTQ reading hour, drag story time, and other clear attempts at indoctrination in our public libraries, these concerns are legitimate.

Given the importance of the public library as a cornerstone of our community, the City Council needs to ensure that the board members appointed uphold the principles of intellectual freedom, neutrality, community cohesion, and moral fortitude. I respectfully urge you to exercise due diligence in evaluating the potential implications of Brian Kirk's appointment and to consider the broader interests of the community. I would like to express my willingness to discuss this matter further or provide any additional information that might assist in your decision-making process. If there is no consensus to block this nomination by the city council meeting on Monday, June 26, please expect a strong showing from the community to voice their concerns. Thank you for your time, attention, and dedication to serving our community.

Contact Your Council Member [Click Here!](#)