

IN THE MISSOURI SUPREME COURT

STATE ex rel.	)	
MATTHEW R. GRANT,	)	Case No.
	)	
<i>Relator,</i>	)	EDMO Case No. ED113599
	)	
vs.	)	Cause No. 2012SL-DR03959-02
	)	
The HONORABLE	)	
JOHN P. TORBITZKY,	)	
Missouri Court of Appeals for the	)	
Eastern District of Missouri, and	)	
The HONORABLE BRUCE HILTON,	)	
Presiding Judge of the Circuit Court	)	
of the County of St. Louis,	)	
21 st Judicial Circuit, Division 13,	)	
	)	
<i>Respondents.</i>	)	

URGENT PETITION FOR PRELIMINARY AND PERMANENT
WRITS OF PROHIBITION, OR IN THE ALTERNATIVE,
PRELIMINARY AND PERMANENT WRITS OF MANDAMUS,
RELATING TO JUDICIAL CORRUPTION IN
THE 21ST CIRCUIT COURT OF THE STATE OF MISSOURI, AND
THE MISSOURI COURT OF APPEALS'
JUNE 3, 2025, IMPROPER WRIT DENIAL,
MOTION TO STAY CIRCUIT COURT PROCEEDINGS,
INCLUDING JUNE 23, 2025, TRIAL SETTING
PENDING OUTCOME OF WRIT PROCEEDINGS, AND
NOTICE OF COURT OFFICER EXTORTION AND
VICTIM TAMPERING

COMES NOW, Relator Matthew R. Grant ("Relator"), pursuant to Rules 84.24(e) & (i), 94 and 97, and petitions this Court to issue Preliminary and Permanent Writs of Prohibition and/or Mandamus, and enter other orders addressing several issues properly presented to Appellate Court Judge John P. Torbitzky ("Respondent Torbitzky" or "Judge Torbitzky"), and to address Petitioner's ongoing request to remove 21st Circuit Presiding Judge, Bruce F. Hilton

(“Respondent Hilton,” “Presiding Judge Hilton,” or “Judge Hilton”) from this circuit court child custody case.

This matter presents both simple and more complex issues for this Court’s consideration. This Petition presents this Court with the *very serious* criminal conduct that has taken place and the corruption that exists within the 21st Circuit Court of the State of Missouri.

The simple issue is that Presiding Judge Hilton continues to act without substantive jurisdiction and must be removed as the trial judge in this case. His extreme bias is palatable. The more complex issues relate to Judge Hilton’s motives and the evidence in the record objectively proving not just bias, but also corruption within the 21st Judicial Circuit Court of the State of Missouri.

Just recently, on June 2, 2025, the court-appointed Guardian *Ad Litem* John Fenley, made a bold and unabashed attempt to again extort and but now tamper with Relator as a victim in this matter.¹ Once again, the Guardian *Ad Litem*, on behalf of the corruption group, sought to trade custody of *the children in this case* for personal benefit for himself and for his co-conspirators.

¹ Relator provides additional evidence of facts not presented to Judge Torbitzky that are not part of trial court record that was presented as part of *Urgent* Petition for Writ. See Motion for Leave to Supplement Writ Filings and Exhibits filed contemporaneously herewith. Relator provides this additional information as an Officer of the Court and as additional background and context to this, the Missouri Supreme Court, of the extortion and victim tampering that has taken place in the 21st Circuit Court, all as part of the corrupt enterprise over which Judge Hilton presides. Obviously, this evidence is unnecessary for this Court’s Writ ruling(s). To the extent the inclusion of these post-May 30, 2025, facts is overly problematic, Relator requests leave to withdraw and/or strike them from the record. Needless to say, this Court needs to know the full extent of the criminal activity in which Judge Hilton is participating and the most recent actions of a court-appointed Guardian *Ad Litem* - John Fenley.

It is shameful but not surprising to Relator who has lived this nightmare for more than one year.²

Relator provides this Court with the actual recording and a MS Word transcript thereof, of the *quid pro quo* offer by the 21st Circuit Court Appointed Guardian *Ad Litem* in this matter, John Fenley, offering Relator custody of his children *only* if he recants and disavows his truthful allegations of criminal corruption:

Relator:

So, well, I said, I'll do what do you want me to do so I can see my kids. There's nothing that I can do. What is it you want me to do?

My kids need to see their father. I'm not using alcohol and I'm not using drugs.

Guardian *Ad Litem* John Fenley:

I want you to have some basis in reality that there's not a conspiracy against you in this whole thing.

See Exhibit Ex. 29 (Exhibit Pages 1204 through 1226) and Ex. 30 (audio hyperlink pending leave of court).

This is the *quid pro quo*.

This is the ongoing extortion and now proof of coercion of a victim by a quasi-court officer acting under the color of law.³ In a single excerpt, from an

² Without going too far down the rabbit hole of everything that these criminals have done, Relator notes that his electronic devices have been illegally accessed and he has been routinely followed. Relator possesses evidence of these *facts*.

³ See, e.g., RSMo. § 575.270 (Tampering with a Witness or **Victim**). Relator is no prosecuting attorney but this criminal enterprise including each of the co-conspirators in this case has violated RICO (18 U.S.C. § 1961 *et seq.*), the Hobbs Act (18 U.S.C. § 1951), each has engaged in extortion, attempted extortion, theft by deception, robbery by coercion, stealing, and many other state and federal criminal statutory violations. See also note 6 *infra*.

Once again, Relator has repeatedly provided this evidence to the *Republican* Office of the United States Attorney for the Eastern District of Missouri, but that office has taken no action to date. None is expected. Relator will address that issue in due course. It is interesting that Republican and *now-former* United States Attorney Sayler A. Fleming

extensive 26-minute call seeking the same result over and over again. It is absolutely shocking.

As this Court listens to the complete 26-minute phone call, it will see that the Guardian *Ad Litem* John Fenley requested to speak with Relator for one reason only: *to try to continue to use custody of the children in this case as leverage to force Relator to stop his exposure of the 21st Circuit corruption on full display in this case and in these Writ proceedings.*

The June 2, 2025, phone call recording is just one of many examples of corruption and the depravation of Due Process that takes place in the 21st Circuit on what appears to be a daily basis.⁴ Rumors and actual discussion of the well-known corruption permeates all circles of the St. Louis legal community. Social media and the internet are overwhelmed with even more evidence. Sadly, Relator's general situation is *not* uncommon.⁵ His specific situation is beyond question. Relator's situation is beyond description.

just resigned on June 3, 2025, effective on midnight this past June 6, 2025. The announcement was **1 day after** the Guardian *Ad Litem*'s **phone call** of extortion and **the same day** as Respondent Judge Torbitzky's Order of Writ denial in this matter.

⁴ Again, there *are* legitimate family law lawyers and honest judges and possibly Commissioners in St. Louis County Family Court. At least, there are legitimate family law lawyers. The rest requires more investigation.

⁵ Relator had hoped to keep the following a bit more close-to-the-vest. However, it seems that this may be the last time Relator may be before this Court for some time and the final time before Judge Hilton strips him permanently of any custody of his children, which will be the result of the **June 23, 2025 trial in this matter**. Relator urges this Court and all Missourians to research the judicial commission members that recommended now Judge Bruce F. Hilton to then Governor Greitens. That commission included *Maia Brodie's* husband. Maia Brodie is the attorney of record in this case for the children's mother Rebecca A. Copeland. Ms. Brodie just so happens to be the OCDC Special Representative for St. Louis, Missouri. She was placed in that position to limit allegations from the St. Louis area from escalating within the OCDC. Next, the key fact witness in this case, S.G., is represented by counsel of record Lawrence Gillespie. Mr. Gillespie, a participant in the corruption, is a former law partner of, Judge Bruce F. Hilton. Ex. 36 (1296 through 1298). Nothing in this case is a coincidence. As Relator

The phone call recording of Guardian *Ad Litem* John Fenley proves not only the offer of a *quid pro quo*, but it is also proof of why Relator's children have been

may not appear before this Court again for some time, Relator offers even more evidence of the motive for the bias in this case. Relator can explain to this Court how Missouri judicial appointments are *actually* made. Not just state, but federal appointments as well. In what law firm was Relator a member for 20+ years? Where was he an equity partner? What firm represented Governor Greitens? Ex. 37 (Exhibit Pages 1299 through 1306). In what law firm have some member(s) or officer(s) of Missouri's 21st Circuit judicial commission been a partner? These facts are public knowledge and are *not* protected by attorney-client privilege. Respondent Rebecca A. Copeland's counsel of record, Maia Brodie, is the OCDC's Special Representative for St. Louis to protect the corrupt lawyers that are co-conspirators here. In this case, Maia Brodie was to help Commissioner Greaves and Relator's former counsel Mat G. Eilerts, but now she is surely helping protect Judge Hilton who was appointed to the bench upon the recommendation of the judicial commission that included - *her husband*. Ex. 38 (Exhibit Pages 1307 through 1308). As more than a coincidence, OCDC Special Representative Maia Brodie's *husband* was **also** on the commission that recommended, of all people, Commissioner Greaves, who recused earlier in this case, after Relator caught her in *ex parte* judicial communication with his *wife* - Maia Brodie. Ex. 39 (Exhibit Pages 1309 through 1310). These facts amount to at least "conflicts of interest" and the conflicts are numerous and obvious. Relator suggests these facts tell a bigger story but this Court need reach that issue now. When Senior Judge Brown, the members of this Court, or any other individual considers the reasonableness of Relator seeking personal safety outside this Country upon his filing of his first Writ with the Missouri Court of Appeals, Relator asks them to consider if they have truly grasped what it is that Relator is actually exposing. This is why Lawrence Gillespie, counsel of record in this case and Judge Hilton's former law partner, stated to Relator: "you have no idea what you are involved in." Contrary to Mr. Gillespie's assumption, Relator knows exactly what it is that he is involved in exposing. That is why he left the United States for almost 3 weeks. These are the reasons why ***the children in this case had their father taken away from them***. Right now, not even supervised visits are allowed. These facts are why the corrupt enterprise, via Guardian *Ad Litem* John Fenley, just called Relator last week and tried to make a final effort to trade custody of his children in exchange for him disavowing his claims of a criminal conspiracy. The call was certainly illegal but Relator knows better than to expect any *Republican*-appointed prosecuting authority to do anything about it. The corrupt scheme is now throwing Hail Mary's left and right.

kept from him in some manner since the inception of this case and the first *ex parte* TRO entered back on March 13, 2024 – **almost 15 months ago**.⁶

The call from the 21st Circuit Court’s appointee, *acting under color of law*, proves that Relator’s children continue to be wrongfully withheld from him, now, solely because he will *not* recant his exposure of the criminal corruption in the 21st

Circuit Court and submit to the *extortion* demanded by the corrupt enterprise.⁷

Again, Relator refuses to settle on allegations and proof of corruption or otherwise relent. Relator’s children and Relator have suffered far too much to allow this madness to continue. Something must be done to arrest this abuse of power.

The phone call was made by Guardian *Ad Litem* John Fenley, but it was actually made on behalf of the entire criminal enterprise, to try once again to compel Relator to cease his mission to hold all of the co-conspirators accountable. As future proceedings will address, each co-conspirator is responsible for the actions of the others.

Previously, the corrupt enterprise led in the 21st Circuit, at its top, by Presiding Judge Hilton, had merely sought Relator’s money, both lump-sum in the form of fraudulent and excessive fees, and ongoing money in the form of exorbitant

⁶ This action surpasses Judge Hilton’s threat of an Order directed to Relator to pay the Guardian *Ad Litem*’s fees *out of the children’s 529 college accounts*. Judge Hilton made that threat from the bench in Division 13. Ex. 33 (Exhibit Pages 1270 through 1277); *see also* note 7 *infra*.

⁷ *See* 18 U.S.C. § 875 (Extortion via Interstate Communications) and § 1201 (kidnapping through seizure for reward). The children in this case were initially held for just money but they are now also being held from their father in exchange for the value of cessation of criminal allegations. Here, the Guardian *Ad Litem* John Fenley has already received money in this case through the ongoing extortion and other criminal offenses. Same for Ms. Brodie. *See* 18 U.S.C. § 880. All of these co-conspirators are also criminally liable under Missouri’s criminal statutes both individually and as co-conspirators. *See, e.g.*, RSMo. § 566.200(4)(c) (Extortion via Coercion – abuse of legal process); *see also* RSMo. § 564.016 (Conspiracy).

and undue child support, all in exchange for the custody of his children that he is due under the law.

The scheme that has been used in the 21st Circuit Courthouse and its actions has a name: EXTORTION.

But now the corrupt enterprise seeks what it desperately needs even more, a cessation of Relator's mission to hold all publicly accountable, evidence for a criminal defense and a hopeful finding of reasonable doubt in future criminal proceedings.⁸ If Relator were not as verbose in his briefing as this Court has already seen, he would literally be at a loss for words.

Because Relator has plenty to say as a Missouri licensed attorney, Bar Number 50312, and therefore *Officer of the Court*, he speaks to this state's highest court as a victim of the ongoing violations of Due Process, and as a victim of the litany of corruption violations of state and federal criminal laws. This brief is again lengthy but it *is* organized in a manner that provides this Court an expedient manner in which to review the current Writ issues ripe within this Petition for Writs, but also, to further review the additional evidence of the bias and the motive for Judge Hilton's actions, and his utter disregard for this Court's March 4, 2025 Order appointing retired circuit court judge T. Lynn Brown as Senior Judge in this matter. Relator notes that his Court of Appeals *Urgent* Petition for Writs and his *New Evidence* Motion for Change of Judge provide the most structured and detailed accounts of the horrific events that have taken place in this case under Judge Hilton's direction and with his assistance. Ex. 23 (Exhibit Pages 1154 through 1156) and Ex. 1 (Exhibit Pages 1 through 112).

As discussed herein, Relator seeks numerous types of immediate relief regarding the substance of this child custody matter **set for trial on June 23, 2025.**

⁸ See notes 2 and 4-6 *supra*.

As an immediate matter, Relator seeks a *stay* of all circuit court proceedings to avoid a pointless trial that lacks even a scintilla of Due Process.

Also, Relator seeks the Partial Unsealing of the REDACTED court records at all levels in this case so that Missourians have their constitutionally guaranteed right of public access protected and so that they can view, in a limited manner, the allegations and proof of corruption that has taken place under Judge Hilton's command in the 21st Circuit Court of the State of Missouri.⁹

While the basis of sealing child custody matters may often be in the best interests of children, the allegations of corruption and denial of Due Process in this matter separate this case from the rest and create the need for the need for the public to have access to the allegations and proof of these issues as they far outweigh any, now eliminated via redactions, risk to the children in this matter.

I. Judge Hilton's Straightforward Lack of Subject Matter Jurisdiction, Bias and Obstruction of this Court's March 4, 2025, Order Appointing Senior Judge Brown.

This Writ can be easily and summarily granted. This Court needs look no further than Judge Hilton's actions relating to this Court's issuance of its March 4, 2025 Order appointing retired circuit judge T. Lynn Brown as Senior Judge for this case.

As this Court is surely aware, after this Court issued its March 4, 2025 Order, Judge Hilton concealed it.¹⁰ See Emergency Petition for Writ, SC101040. Presumably, this Court denied Relator's prior Writ request as he was unaware that

⁹ Relator is mindful of the fact that Judge Hilton only became Presiding Judge of the 21st Circuit on January 1, 2025. That fact is scarier than it is exonerating for anyone with any historical oversight of the St. Louis County Family Court. This case does not present the issue of supposed local counsel favoritism. This is case involves criminal conduct.

¹⁰ If not intentionally concealed, the court's supposed "clerical error" creates a *per se* appearance of impropriety. See, e.g., Code of Judicial Conduct, Rule 2-2.11. In reality, Judge Hilton's actions violate nearly every Rule and provision within Canon 2.

Senior Judge Brown stood ready, as an apparent fair, impartial and independent jurist, to rule upon Relator's Motion for Change of Judge. As discussed in more detail later in this Petition, Senior Judge Brown was provided the opportunity to address this issue after Relator's May 17, 2025, *New Evidence* Motion for Change of Judge, and his May 17, 2025 and May 20, 2025, Rule 74.06(b) Motions to Vacate and Set Aside Senior Judge Brown's April 2, 2025 Order entered *in absentia*.¹¹

This Court's ruling in *Matter of Buford*, 577 S.W.2d 809 (Mo. banc 1979), and the Court of Appeal's similar ruling in *Elnick v. Caracci*, 255 S.W.3d 692 (Mo. App. E.D. 2008), make clear that once any judge is challenged for bias or even based upon an appearance of impropriety, he or she loses subject matter jurisdiction until that issue is resolved by another, impartial jurist.¹² It is commonsense. That black letter rule of law exists to avoid the situation that has unfolded in this case – a rouge judge acting with reckless abandon to punish the litigant that sought a new judge in the first instance.

What has happened here and what is ongoing is tragic. It is saddening.

The *children in this case have suffered* and they *suffer* at this moment. Relator has no right to see his children whatsoever. That is solely because of his filing of the March 26, 2025 Emergency Petition for Writs in the Court of Appeals. As discussed below, Judge Hilton will not even address the fact that the bases for the TRO and Preliminary Injunction are contrary to proven fact and that the motions were filed in bad faith. Of course he won't, he is part of the scheme that took Relator's children away in retaliation for exposing him for what he is.

¹¹ As discussed *infra*, the immediate conclusion on removal for appearance of impropriety is readily apparent. However, in light of the *very serious* issues of public concern and judicial integrity, Relator requests that this Court issue a full opinion on why removal for cause is appropriate. As detailed below, Relator requests that the final Order, whatever it may be, be unsealed for Missourians to view if they like on caseNet.

¹² See note 9 *supra*.

What has happened here is *so much worse* than some judge accepting a bribe. These actions deprive children access to a parent and a parent access to children at a time when precious few days remain before emancipation, which cannot be replaced.

This is not a one-time and rare situation. Relator brings this, the Missouri Supreme Court, proof of a long-standing racketeering and criminal organization that conducts its criminal acts in *some* of the courtrooms and chambers of the 21st Circuit Court of the State of Missouri.¹³

This is Relator's second Writ filing in this Court. *See* SC101040. In his prior filing, Relator demonstrated that Missouri law required the removal of Judge Hilton for a litany of reasons including his retaliatory violations of *Matter of Buford* and *Caracci*. Relator returns with much more evidence of even more improper conduct, including Judge Hilton's rejection of this Court's March 4, 2025 Order that he concealed, and his latest retaliation against Relator that began on March 27, 2025, just *1 day after* his prior Writ filings in the Court of Appeals in Case No. 113446. While this Supreme Court clearly planned Senior Judge Brown to address these issues, Judge Hilton has put an end to that procedural avenue of redress and he has ignored the March 4th Order of this Supreme Court. Indeed, Senior Judge Brown is now procedurally unreachable as Judge Hilton will simply continue to deny any Motion that Relator may file that is directed to this Court's appointed Senior Judge.

As this Court is aware, Judge Hilton concealed this Court's March 4th Order appointing Senior Judge Brown denying Relator of effective and timely notice of this Court's action. Unaware, Relator filed what he later came to learn were likely 2 *moot* Petitions for Writs, one with the Court of Appeals and the other before this Court. *See* ED113446 and SC101040.

¹³ As this may Relator's final chance to file substantive evidence with this Court, this brief will reveal information and strategy that Relator had hoped to continue to keep as personal strategy for a bit longer. *See, e.g.,* note 5 *supra*.

Relator now *finally* understands that the March 4th Order from this Court was legitimate and why his prior Petition for Writ was denied. He returns now to finally complete his task of providing evidence to this Court demonstrating how Judge Hilton, who Presides over the entire 21st Circuit Court of the State of Missouri located in Clayton, is not only biased, but how he has decided to thumb his nose at this, the State of Missouri's highest court, sitting in Jefferson City. Judge Hilton believes that 21st Circuit sits above the Missouri Supreme Court. He needs to be swiftly and sharply reminded of his mistaken belief.

The *retaliation* that Relator continues to suffer borders on unbearable and the children in this case will likely never recover from what has been done to them. But, this Court now has a chance to begin to recognize and address the corruption and racketeering that exists in the 21st Circuit Court of the State of Missouri and begin to return some small sense of normalcy to the children's lives. The children in this case need to spend significant, quality time with their father.

A. Judge Hilton's Violations of *Matter of Buford and Caracci*.

1. Judge Hilton's violations and lack of jurisdiction *before* May 17, 2025.

As Relator brought to this Court's attention in his April 2, 2025 Emergency Petition for Writ filed with this Court, Judge Hilton acted on February 28, 2025, without any jurisdiction because Relator had filed, not one, but two Motions seeking to disqualify him as the trial judge in this matter. Ex. III (Exhibit Pages 733 through 750) and Ex. JJJ (Exhibit Pages 751 through 768).

Matter of Buford and Caracci squarely hold that as soon as the February 27, 2025, Motion for Change of Judge was filed, Judge Hilton had to cease all rulings and allow another judge to consider and rule upon the issue of whether Judge Hilton should be removed due to an appearance of impropriety or due to bias and cause.

Judge Hilton was not foreign to the application of *Matter of Buford and Caracci* in this case, Relator presented the cases to him in his briefing and Judge Hilton's improper tactics were a mere mimic of the very same strategy that

Commissioner Greaves employed as part of the same corruption before she recused in this case. Notably, Commissioner Greaves recused after Relator, overwhelmingly proved on the record that she had engaged in *ex parte* judicial communication with OCDC Special Representative Maia Brodie who represents Rebecca A. Copeland in this matter. Ex. BB (Exhibit Page 380 through 381) and Ex. GG (Exhibit Pages 447 through 462).

Just like Commissioner Greaves did following Relator's December 2, 2024 oral Motion to Disqualify her for bias, Judge Hilton invoked the same strategy and although he knew that once Relator filed his February 27, 2025 Motion for Change of Judge, and after he knew he was stripped of all jurisdiction pending further rulings from another judge – here, pursuant to Rule 51.05(e), the Missouri Supreme Court, he nevertheless pressed on and began to punish Relator for his shocking but true filings.¹⁴

For reasons that are now abundantly clear, Judge Hilton had no intention to acknowledge the effect of the February 27, 2025, Motion for Change of Judge and, he would never voluntarily allow the Missouri Supreme Court to see this case docket as the corruption drips off the court docket and record. Once he saw Relator's bold Motion for Change of Judge and request for transfer to this Court under Rule 51.05(e), Judge Hilton launched **Round 1** of this Retaliatory Strikes.

Judge Hilton ignored his lack of jurisdiction of which he was undoubtedly aware and he immediately *punished* Relator with a series of null and void orders all dated February 28, 2025. Ex. KKK (Exhibit Page 769) and Ex. LLL (Exhibit Page 770). These Orders included a denial of Relator's Motion to Vacate a Consent Order

¹⁴ As discussed below and in Ex. 1 (Exhibit Pages 1 through 112), Judge Hilton previously deceived Relator and persuaded him to abandon his January 2025 Motion for Change of Judge and for transfer to this Court. This background is the basis for Relator's confidence in the fact that while Judge Hilton had no fear of the Eastern District Court of Appeals, he was and is *deathly* afraid of a review of his actions by this Court. The reason is quite obvious.

dated October 2, 2025, that, once granted, would have returned the children in this matter to 50/50 physical custody with him, their father. Ex. KKK (Exhibit Page 769).

Next, Judge Hilton *fired* another retaliatory shot once again and ordered Relator to answer discovery that was served during a null and void discovery window allowed by a null and void December 9, 2025, Order entered by Commissioner Greaves after Relator had earlier made a Motion to Disqualify her for bias.¹⁵ Ex. LLL (Exhibit Page 770), Ex. AA (Exhibit Page 379) and Ex. CC (Exhibit Page 380).

Finally, Judge Hilton reloaded and granted his *former law partner* and co-conspirator Lawrence Gillespie's Motion to Dismiss relating to his client's deposition. *Id.* Co-conspirator Gillespie's client happens to be the key fact witness in this case who has recently been interviewed by the Town and Country, Missouri Police Department and who Mr. Gillespie once already avoided her deposition by walking out, calling Relator and his 2 counsel of record at the time "3 stooges."¹⁶ Ex. 33 (Exhibit Pages 1270 through 1277).

Missouri law is clear and this Court should rule that each of the retaliatory February 28, 2025, Orders were entered without subject matter jurisdiction and each

¹⁵ As is addressed elsewhere, this discovery was allowed by Commissioner at the request of OCDC Special Representative Maia Brodie to determine the amount of evidence of perjury by Rebecca A. Copeland and one or more fact witnesses in the case, that Relator possessed. Notably, Ms. Brodie and her client had failed to consider that issue and failed to serve any discovery requests on the topic before discovery closed in November 2024.

¹⁶ The mere fact that Mr. Gillespie would file a "Motion to Dismiss" directed to a deposition subpoena and the fact that Judge Hilton would grant it is indicative of the quality of legal practice in the St. Louis Family Court. Obviously, the Missouri Rules of Civil Procedure do not allow for a "Motion to Dismiss" a subpoena. Nevertheless, Judge Hilton helped out his co-conspirator and *former law partner* and entered an Order in his favor, without having any jurisdiction to do so. This example of motion practice in the St. Louis Family Court is further proof of why it is truly a kangaroo court.

is therefore null and void as a matter of law. See *Matter of Buford*; *Caracci*; and *Parmer v. Bean*, 636 S.W.2d 691, 695 (Mo. App. E.D. 1982) (“When the court lacks subject matter jurisdiction, any action it takes is null and void.”) *reversed on other grounds by McCracken v. Wal-Mart Stores East LP*, 2987 S.W.3d 473 (Mo. banc 2009). If this Supreme Court does not address Judge Hilton’s actions, it effectively overrules its own commonsense precedent in *Matter of Buford* and the holding in *Caracci*.

On March 4, 2025, Judge Hilton learned, although Relator was not advised ***until 23 days later***, that this Court was aware of his antics, when he received this Court’s March 4, 2025, Order appointing retired circuit judge T. Lynn Brown as Senior Judge in this matter. Judge Hilton must have been in utter shock once he learned that he and his co-conspirators in the 21st Circuit Court had been exposed to the Missouri Supreme Court and he and his fellow corrupt conspirators were now being scrutinized.

Faced with the option to respect the March 4th Order from this state’s highest court as he immediately should have, Judge Hilton hid it from Relator and failed to publish it to the court docket leading to a string of avoidable events.¹⁷ It is now clear that March 4, 2025, was the date on which Judge Hilton decided to charge down an illegal path and obstruct any opportunity that Relator may have to procedurally have him removed and held accountable. Relator understands why Judge Hilton made this choice. The court docket in this case is simply indefensible. He knows that only some procedural miracle might allow him to avoid this Court’s review and judgment.

Had Relator been made aware that this Court’s March 4, 2025 Order existed when it was file-stamped that same day by Judge Hilton’s clerk Veronica Gipson, this matter would be on an entirely different path. Surely, ***the children in this case***

¹⁷ See note 10 *supra*.

would have already been returned to *at least* the 50% physical custody of their father and a new, impartial trial judge would be well on her or his way of tackling the task of undoing the knot of Due Process violations that was tied tightly by Judge Hilton, OCDC Special Representative Maia Brodie, Guardian *Ad Litem* John Fenley and Rebecca A. Copeland.

Instead, this Court's Order was dated March 4, 2025, and here we are ***more than 3 months later***, finally addressing the ripe appellate issue of Judge Hilton's necessary removal in this case, the very issue that *Republican* appointed, Respondent Judge John P. Torbitzky somehow deemed unworthy of his consideration.¹⁸

Again, after March 4, 2025, Judge Hilton had no authority to take any action other than possibly vacating his own improper Orders entered on February 28, 2025.

What happened next is a complete mystery. Senior Judge Brown presumably had access to this case's docket. Or maybe Judge Hilton failed to administratively allow it. Only time will tell us all the answer to these questions. Regardless, from March 4, 2025 to March 25, 2025, there was no activity in this case and no hearing setting relating to Relator's February 27, 2025, Motion for Change of Judge. Ex. FF (Exhibit Pages 412 through 446).

A reasonable litigant would have expected Judge Hilton to have not only advised the parties of the March 4, 2025 Order by publishing it to the docket, but

¹⁸ Hopefully now all, including this Court, can see the basis for Relator's Motion to Disqualify the entire Court of Appeals. Judge Hilton promised it was corrupt just like him, he just didn't specify which judges he was suggesting were on the take. See Motion to Disqualify the Entire Court of Appeals, Case No. ED113446. As discussed below, Relator makes no allegation of wrongdoing but Judge Torbitzky's Order suffers from *at least* an appearance of impropriety. Relator assumes this Court knows exactly how Relator's second EDMO Writ found its way to a single *Republican* judicial appointee. Relator is not an appellate lawyer, but the basic inner workings of an appellate court are known to many licensed attorneys. Clearly, Relator was unaware of the rotating Writ Division(s) as his EDMO Writ was incorrectly assumed to have been on its way to Judges Hess and Clayton who considered and ruled upon Case No. 113446.

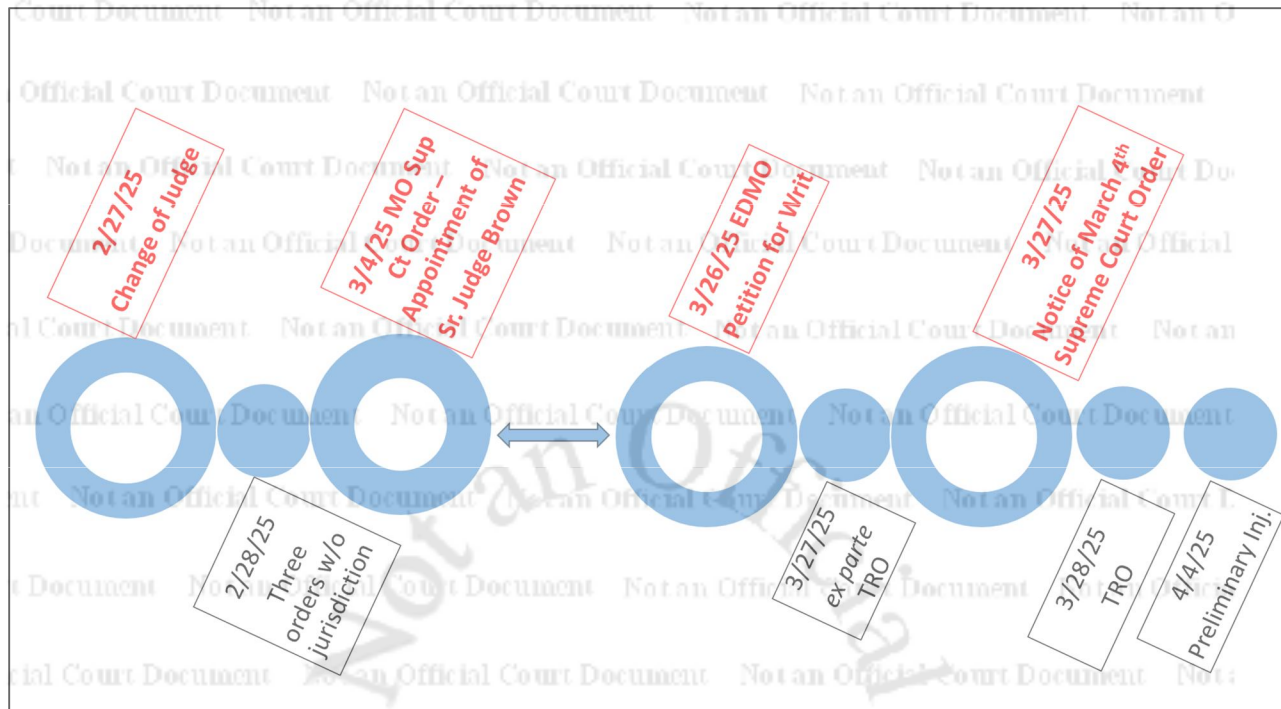
also, he clearly should have provided some sort of contact information for Senior Judge Brown. That contact information is lacking to this day despite Relator's request, of which this Court is already aware.¹⁹ Ex. 32 (Exhibit Pages 1267 through 1269).

Regardless, on March 26, 2025, not knowing of the March 4th Order or of Senior Judge Brown's appointment or even existence, Relator prepared and filed an *Emergency* Petition for Writ in the Missouri Court of Appeals for the Eastern District of Missouri. Ex. F (Exhibit Pages 179 through 206).

Judge Hilton and his co-conspirators acted immediately. The Guardian Ad Litem went first and he filed two Motions directed at Relator. But, on March 27, 2025, and less than 24 hours after Relator's appellate court Writ filing, Judge Hilton began **Round 2** of the real retaliation when he granted an *ex parte* Motion and request by Respondent Rebecca A. Copeland for a Temporary Restraining Order that took the children away from Relator 100% of the time. Ex. F-1 (Exhibit Pages 207 through 209). There was no factual basis for the Motion for TRO in the first instance, and there was certainly no basis for it being granted *ex parte*. Ex. 20 (Exhibit Pages 1137 through 1150).

The next day, Judge Hilton, again without jurisdiction to do so, entered a TRO and then the next week he entered a baseless Preliminary Injunction. Ex. F-2 (Exhibit Page 210) and Ex. F-3 (Exhibit Page 211). All of these orders had the intended effect of punishing Relator for charting a course and commencing the climb of the appellate courts in this state in order to reach this Court, the Court that could and would hold Judge Hilton accountable.

¹⁹ See note 1 *supra*.



After the dust settled following the fiasco caused solely by Judge Hilton's improper actions, and after Relator returned to St. Louis, Missouri, Relator began the process of appropriately and procedurally addressing the situation that existed at the time.

Relator first jointly addressed the April 2, 2025, *in absentia* Order denying his first motion to disqualify Judge Hilton and the new evidence that had *not* existed on February 27, 2025, when he filed his May 17, 2025, Motion for Change of Judge.²⁰ Ex. 1 (Exhibit Pages 1 through 112).

On May 20, 2025, Relator separately perfected his Rule 74.06(b) Motion to Vacate and Set Aside as a separate Motion. Ex. 5 (Exhibit Pages 802 through 814).

²⁰ The issue of Relator's reliance upon Rule 74.06(b)'s excusable neglect and fraud provisions need not be addressed by this Court. In sum, Judge Hilton and his ongoing fraud are solely responsible for Relator's failure to personally attend the April 2, 2025 hearing before Senior Judge Brown. As discussed below, Judge Hilton refused to allow Senior Judge Brown to make that finding one way or the other on his own. Instead, Judge Hilton denied the Motions and put an impassible obstacle to the very pathway to Senior Judge Brown created by this very Court.

Despite his May 17, 2025, *New Evidence* Motion for Change of Judge for Cause, Relator was well-aware that Judge Hilton would continue down his rogue path, ignore his inability to proceed until Senior Judge Brown ruled upon these new filings, and that Judge Hilton would proceed with the preexisting May 21, 2025 hearing on his co-conspirator OCDC Special Representative Maia Brodie's Motion to Strike filed on behalf of another co-conspirator, Rebecca A. Copeland. Ex. 21 (Exhibit Page 1151) and Ex. 31 (Exhibit Pages 1228 through 1266).

On May 20, 2025, Relator had filed an Emergency Motion To Open All Division 13 Hearings And Trial Days To The Public and to Partially Unseal the Record, in an effort to at least begin some transparency into the actions, whether correctly deemed corrupt or not, taking place in Judge Hilton's courtroom, Division 13, of the 21st Circuit of the State of Missouri.²¹ Ex. 16 (Exhibit Pages 1028 through 1085).

Of course, Judge Hilton denied that Motion to allow any public access without even reading it. Ex. 21 (Exhibit Page 1151) and Ex. 33 (Exhibit Pages 1270 through 1277). Respondent Judge Torbitzky similarly ignored Relator's request to order transparency at the Circuit Court and Court of Appeals levels. Ex. 24 (Exhibit Pages 1184 through 1186) and Ex. 28 (Exhibit Page 1203).

The parties had colluded again and the table was set for another round of retaliation against Relator. There was no doubt about it.

²¹ Whether or not Relator's claims of corruption are true, which they obviously are, is irrelevant to the fact of their being alleged. It is the good-faith allegation of corruption that triggers the Missouri public's right of access under *Transit Cas. Co. ex rel. Pulitzer Publishing Co. v. Transit Cas. Co. ex rel. Intervening Employees*, 43 S.W.3d 293 (Mo. banc 2001). As this Court was understandably silent on the standard that must exist to avoid meritless assertions of corruption made solely to unseal case records, Relator respectfully suggests that objective good faith may be a fine idea. In any event, this all levels of court activity in this case undoubtedly qualify for public access under this Court's *Trans Cas. Co.* decision.

2. Judge Hilton's violations and lack of jurisdiction after May 17, 2025.

As noted above, the moment Relator filed his May 17, 2025 *New Evidence* Motion, Judge Hilton lost subject matter jurisdiction in this case and he was obligated to take no action, and certainly no action adverse to Relator, until Senior Judge Brown could issue his rulings. This Court is aware that Relator sent Judge Hilton an email attaching a courtesy copy of his May 17, 2025 filing, as he copied Honorable Chief Justice Russell on that email.

Faced with actual notice of his lack of jurisdiction, Judge Hilton jumped back into retaliation mode and went forward with a previously set hearing on May 21, 2025. *Matter of Buford* and *Caracci* make clear that Relator's May 17, 2025, *New Evidence* Motion for Change of Judge for Cause alone prohibited Judge Hilton from moving forward until Senior Judge Brown could rule.

First, Judge Hilton denied Relator's Emergency Motion to Open the Courtroom and Partially Unseal the record. First, he admitted that had not even read it. Ex. 33 (Exhibit Pages 1270 through 1277). He described Relator's filing from 7:18 p.m. the day before, as being made "in the middle of the night." *Id.* Relator advised the court that he cited a Missouri Supreme Court case directly on point, a reference to *Transit Cas. Co. ex rel. Pulitzer Publishing Co. v. Transit Cas. Co. ex rel. Intervening Employees*, 43 S.W.3d 293 (Mo. banc 2001). Of course, Judge Hilton had no interest in the mandatory precedent and he denied the motion he had not read as that served his goal of keeping the public's access to evidence of corruption in the 21st Circuit Court blocked a little while longer.²² As Relator argued, Missourians should be allowed to attend every hearing or view every other

²² Curiously, it seems that Judge Torbitzky did not realize that his ruling accomplished the same result. Clearly, Judge Torbitzky similarly did not read *Transit Cas. Co. ex rel. Pulitzer Publishing Co. v. Transit Cas. Co. ex rel. Intervening Employees*, 43 S.W.3d 293 (Mo. banc 2001).

court activity in this case, with appropriate limitations based in protection of the children, which these issues are not.

The parties agreed to return on June 2, 2025, for argument on Respondent Rebecca A. Copeland's Motion to Strike that was not timely noticed. Relator took advantage of the June 2nd setting and provided notice and obtained permission from the Court to file a handwritten Notice of Hearing for, among other things, his oral Motion to Dissolve the retaliatory Preliminary Injunction for the same date and time.

Next, Judge Hilton, seeing the writing on the wall, did the unthinkable, and he denied Relator's Motion for Change of Judge directed at Judge Hilton himself. Of course, that Motion had to be ruled upon by Senior Judge Brown as per the appointment by this Court. Judge Hilton went on and he denied Relator's Motion to Vacate directed to Senior Judge Brown relating to Judge Brown's *own* April 2, 2025, Order entered *in absentia*. Ex. 21 (Exhibit Page 1151). Absolutely earth shattering. Judge Hilton effectively stole the pen right out of Senior Judge Brown's hand.

The barely moving wheels of justice came to a grinding halt in the 21st Circuit the moment Judge Hilton entered those Orders.

Those two motions were not even set for hearing. As he stated on the bench, Judge Hilton hoped that Relator would believe that he had missed his only "shot" to have Judge Hilton removed from this case. Ex. 33 (Exhibit Pages 1270 through 1277). Like the Guardian *Ad Litem* John Fenley's call several days later, it was a Hail Mary pass that he hoped would somehow be caught and that somehow and somehow Relator would simply accept the denial Orders and move towards trial. What an insult to Relator's intelligence.

Relator told Judge Hilton at that moment, on no notice whatsoever, that he would simply take another Writ to the Missouri Court of Appeals. The blood that had made the furry in Judge Hilton's face beat red in anger previously, immediately drained as he realized his pass of desperation had missed its mark.

Critically, Relator stated that he would await the next round of rulings on June 2, 2025, and take all the issues up at once.

The timeline is critically important. Because five days later, on May 26, 2025, Guardian *Ad Litem* John Fenley sent an email to Relator and asked to speak with him about “what has been happening the past several months”²³:

On Tue, May 27, 2025 at 6:05 AM John Fenley <john@rhflegal.com> wrote:

Matt,

I was informed by Rebecca about the need for [REDACTED] surgery and her difficulty in getting insurance information. For [REDACTED] sake, please work with her to get that cleared up so he can have the procedure done as has been recommended. This should not be something either of you are fighting over or making a big issue out of.

Next, I would like to meet with you in the next 7-10 days if you are willing to do so to discuss what has been happening the past several months. If you are willing let me know and we can work on setting something up.

Ex. 34 (Exhibit Pages 1278 through 1280).

The strategy was clear. The corrupt co-conspirators decided to make a final run at Relator before he could file his next Writ Petition which was supposed to have been *after* the June 2, 2025 hearing. There can be no doubt that the corrupt enterprise believed they had time to cut the burning fuse that Relator had lit with his comment about a second Writ in the Court of Appeals.

²³ Relator provides additional evidence of facts not presented to Judge Torbitzky that are not part of record that was presented as part of *Urgent* Petition for Writ. Relator provides this information as an Officer of the Court and as additional background and context for his to this, the Missouri Supreme Court, of the extortion and victim tampering that has taken place in the 21st Circuit Court, all as part of the corrupt enterprise over which Judge Hilton presides. Obviously, they are unnecessary for this Court’s Writ ruling(s) and likely cannot be formally considered for such rulings. To the extent the inclusion of these post-May 30, 2025, facts is overly problematic, Relator requests leave to withdraw and/or strike them from this filing. Needless to say, this Court must know the full extent of the criminal activity in which Judge Hilton is participating and the actions of a court-appointed Guardian *Ad Litem* - John Fenley. *See also* note 1 *supra*.

But, in reality, Relator was busy working away on his EDMO Urgent Petition for Writ filings that he placed on file on May 30, 2025. Ex. 23 (Exhibit Pages 1154 through 1156) and Ex. 27 (Exhibit Pages 1195 through 1202). That date is important because the June 2, 2025 hearing still went forward as planned. Ex. 31 (Exhibit Pages 1227 through 1266) and Ex. 33 (Exhibit Pages 1270 through 1277).

On that date, June 2, 2025, Judge Hilton once again knew that he had no jurisdiction in this case. *See Matter of Buford* and *Caracci*. But he moved forward anyways. Because the rulings are not, as Relator understands it, part of the record before this court he merely advises this Court that Judge Hilton once again ruled against Relator in blatant retaliation. In sum, he denied a Motion to Strike but told OCDC Special Representative Maia Brodie that he would grant a Motion *in Limine* to keep any information or documents out of evidence at trial that Relator were responsive to his order compelling compliance with discovery. Ex. 33 (Exhibit Pages 1270 through 1277).

Judge Hilton's Order still boggles the mind considering Relator produced sworn interrogatory answers and made the requested documents available in the manner in which they were stored precisely as allowed in Rule 58.01(d). Ex. 33 (Exhibit Pages 1270 through 1277) and Ex. 35 (1281 through 1295).

Most importantly, at the June 2, 2025, hearing, that was scheduled with the clerk and the parties back on May 21, 2025, Judge Hilton refused to hear Relator's Motion to Dissolve the Preliminary Injunction. More retaliation. The baseless injunction that at this moment keeps Relator's children from their father based upon disproven claims that Relator was using alcohol and drugs, irrefutably disproven by known breathalyzer results and by 2 ninety-day hair follicle drug tests supposedly could not be heard as was agreed.

The reason: Even though Judge Hilton's clerk provided the date and file-stamped Relator's handwritten Notice of Hearing on the Preliminary Injunction dissolution Motion, Judge Hilton *actually* ruled that the hearing in which the parties were standing would not work. It is utter insanity.

Judge Hilton held that Relator must obtain another date for a “testimonial” hearing. Pure **retaliation**. Reloaded and **fired** at Relator once again. The parties stood before Judge Hilton having just argued Respondent’s Motion to Strike before Judge Hilton, a bailiff, the clerk, the division court reporter, but Judge Hilton ruled that at that moment it was not possible to take up the issue of the children seeing their father. Once again, proof that Due Process Rights mean nothing in the 21st Circuit Court for the State of Missouri.

The evidence and record now show why Judge Hilton did not agree to hear Relator’s Motion to Dissolve the Preliminary Injunction that afternoonj. He and his co-conspirators had planned one last run at Relator to take place “after court” just like what Guardian *Ad Litem* John Fenley stated in his email.

John Fenley <john@rhflegal.com>
To: Matt Grant <mattgrant.stl@gmail.com>

Wed, May 28, 2025 at 3:46 PM

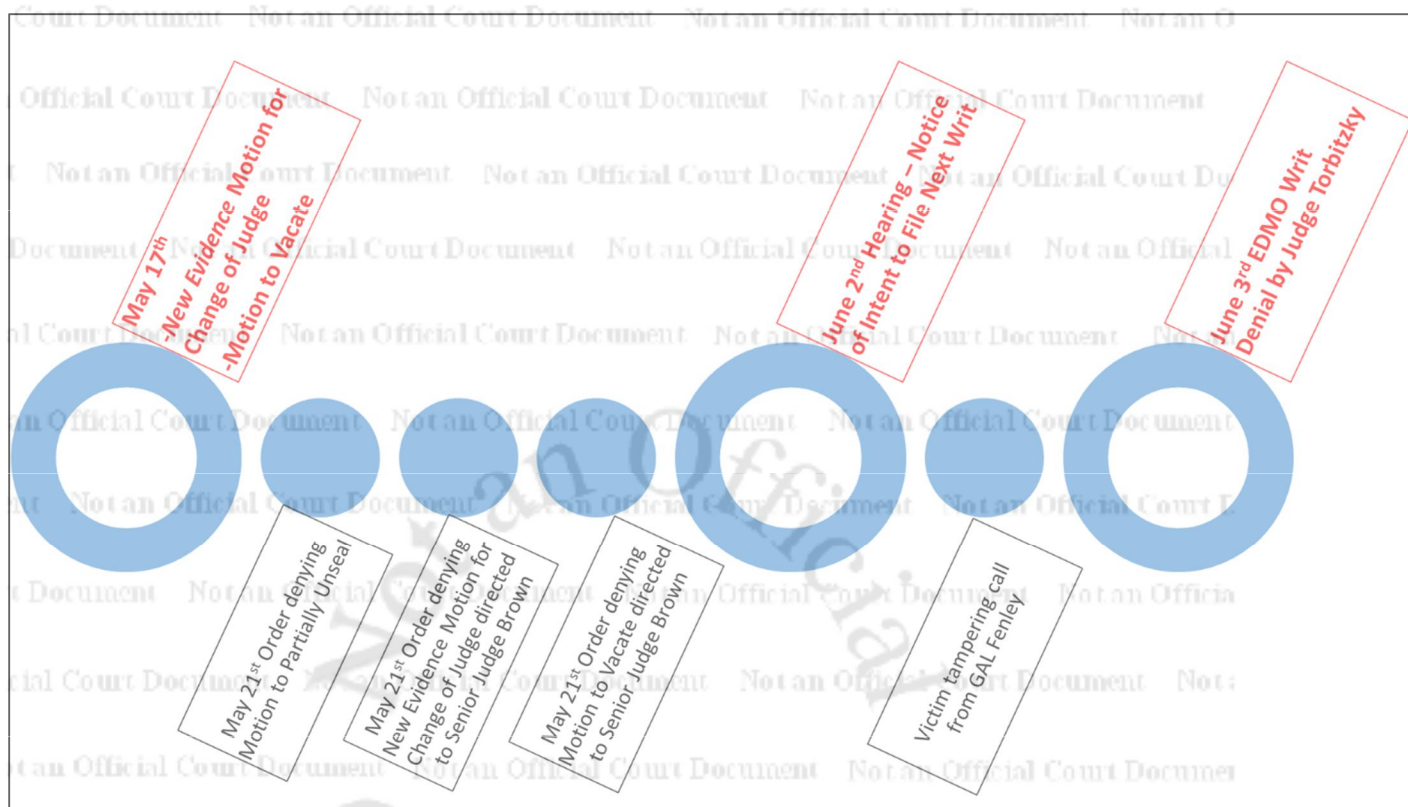
If time allows could we meet after court on Monday?

Ex. 34 (Exhibit Pages 1278 through 1280).

Following that June 2, 2025, hearing and after Mr. Fenley and Relator were unable to catch up in person, the timeline returns to court-appointed Guardian *Ad Litem* John Fenley’s phone call of extortion that he had initially requested back on May 26, 2025. Ex. 29 (Exhibit Pages 1204 through 1226), Ex. 30 and Ex. 34 (Exhibit Pages 1278 through 1280).

Without recounting that call in substance once again, the corrupt parties knew that there was little, if any, time left to dissuade Relator from continuing on his mission to fully expose their criminal corruption.

Here once again, the timeline of events shows exactly the bias of Judge Hilton and how he wholly disregarded this Court’s March 4, 2025, Order appointing Senior Judge Brown in this matter.



What is notable is that, as reflected in the call recording, both Relator and surely GAL Fenley were *unaware* that only one *Republican* judge in the Missouri Court of Appeals would actually rule on Relator's 2nd Petition for Writ filed in that court in this matter. The desperation apparent in Mr. Fenley's call seems to suggest that all co-conspirators, including Judge Hilton, were unaware as well.

On that note, Relator notes that Judge Torbitzky violated Code of Judicial Conduct Rule 2-2.11 as he should have recused from hearing Relator's Urgent Petition for Writ.²⁴ As Relator stated in footnote 8 of his *Urgent* Petition for Writ, he asserted the same grounds of impropriety that had led to the recusal of Republican Judges Lay and Gaertner in Case No. ED113446. Ex. 23 (Exhibit Pages 1154

²⁴ Relator perfects the lack of recusal argument here but is willing to *withdraw and waive it* if it would only serve to avoid this *Urgent* Petition for Writ from being granted in a way that this matter is simply remanded to the Court of Appeals for ruling by a different, non-conflicted judge (e.g., a Democrat Appointee). More delay is unacceptable. Relator's children need to be *rescued* now.

through 1183, n.8); *see also* Case No. ED113446, Relator's Motion to Disqualify the Entire Missouri Court of Appeals.

All issues relating to Judge Hilton's propriety as trial judge in this matter are ripe and now properly before this Court. Relator looks forward to this Court's thoughtful and impartial opinion.²⁵

Before moving on, Relator notes that he, just like in the Court of Appeals, he requests that his filings and this Court's Order in this matter be Partially Unsealed for the public's access.

As Relator unsuccessfully argued to both Judge Hilton, who admitted he didn't even read the Motion, and to Judge Torbitzky, this Court's ruling in *Transit Cas. Co. ex rel. Pulitzer Publishing Co. v. Transit Cas. Co. ex rel. Intervening Employees*, 43 S.W.3d 293 (Mo. banc 2001), as a matter of first impression, explained precisely how the public's constitutional right of access to the public records of this case must be evaluated and why Relator's Motion to Partially Unseal should be granted.

As *Transit Cas. Co.* explains, there is a *presumption* in favor of public access. As is discussed in the pages below, the moment Relator raised the issue that the Court's Operating Rules in this Paternity action could not rebut the presumption in favor of public access, the burden shifted to Respondent Rebecca A. Copeland and the Court to either conduct a hearing or otherwise present some evidence as to why Relator's allegations and proof of corruption by the Presiding Judge of the 21st Circuit (Bruce F. Hilton), corruption by a Special Representative of the OCDC (Maia Brodie), corruption by a court-appointed Guardian *Ad Litem* (John Fenley), and the knowing involvement and participation in the corruption of a criminally abusive mother (Rebecca A. Copeland) all, taken together, do *not* support the clear finding that in this case, that the *presumption* cannot be overcome

²⁵ *See* note 11 *supra*.

as a matter of law and that Missourians must be provided public access to REDACTED materials in this case.

As noted in Relator's separate Motion, he proposes a workable partially unsealing of non-sensitive and redacted versions of any sensitive materials to the public. This case also has a Protective Order that Relator demanded back in July 2024, and that additional safety net provides plenty of protection to allow the public to see the REDACTED versions of the pleadings and all Orders of all levels of all courts that have ruled in this matter to review the allegations of corruption and evaluate for themselves, if they like, just exactly what is happening in their 21st Circuit Courthouse.

As previously noted, the courthouse is *an asset of the public* and here, under these facts, the public has an absolute to access allegations and proof of the long-standing corruption that has now finally been exposed in this case.

Finally, because this case is headed *full speed* to a **June 23, 2025 trial** before Judge Hilton, before which there is no way Relator can obtain an impartial result, Relator requests that this Court **STAY** the underlying circuit case pending further ruling(s) from this Court.

The additional forms of relief sought by Relator are detailed in **Section IV** below.

II. SUPPORT FOR PETITION FOR WRITS

In support of his Petition, Relator states:

1. Relator returns and seeks the assistance from this court to end the corruption that has taken place in this particular case.
2. Presiding Judge Hilton's ongoing actions in this matter coupled with Missouri Rules of Judicial Conduct, establish, *as a matter of law*, that he cannot remain the trial judge in this matter.
3. Presiding Judge Hilton continually acts without subject matter jurisdiction in direct violation of *Matter of Buford*, 577 S.W.2d 809

(Mo. banc 1979), and *Elnick v. Caracci*, 255 S.W.3d 692 (Mo. App. E.D. 2008).

4. Additionally, Judge Hilton was aware that on May 20, 2025, Relator had filed His Motion To Vacate And Set Aside April 2, 2025 Order Entered *In Abstentia* Denying Peitioner's February 28, 2025 Verified Motion For Change Of Judge And To Disqualify Judge Hilton And The Entire 21st Circuit For Cause And/Or Due To The Appearance Of Impropriety, Due To Pervasive Judicial, Guardian *Ad Litem*, Lawyer, And Courthouse Personnel Corruption, And For Assignment Of New Trial Judge. Ex. 5 (Exhibit Pages 802 through 814) and Exhibits thereto Exs. 6 through 15 (Exhibit Pages 815 through 1027).
5. Relator made the same request to Vacate and Set Aside the April 2, 2025 Order in a footnote in his May 17, 2025, *New Evidence* Motion for Change of Judge, but he filed a separate motion to perfect the docket as he promised.
6. Judge Hilton was fully aware that Relator had filed a proper Motion to Vacate pursuant to Rule 74.06(b), and that he would argue to Senior Judge T. Lynn Brown that at least excusable neglect and fraud as the reasons, among others, for his in-person absence at the Motion April 2, 2025, hearing.
7. The moment Relator filed his May 17, 2025, *New Evidence* Motion for Change above, Judge Hilton was stripped of subject matter jurisdiction as a matter of law.
8. Judge Hilton remains without jurisdiction from that date up to this very day.
9. As this Court may be aware, as Relator noted in his Motion to Vacate and in his prior Writ filings with the Missouri Supreme Court (SC101040), he reasonably sought personal safety in a foreign

country during at least the time frame of March 27, 2025 through April 5, 2025.

10. Relator, the members of this Court, and a relatively few others truly understand the danger incurred by Relator by exposing Presiding Judge Hilton and the 21st Circuit Court corruption at issue in this case.

11. Relator sought safety abroad because while Presiding Judge Hilton is the top of ladder in the 21st Circuit Courthouse, the scheme of corruption spreads much broader and, more importantly, much higher in this State.

12. Regardless, Relator's New Evidence Motion for Change of Judge and Motion to Vacate Senior Judge Brown's April 2, 2025 Order entered in abstentia were motions that only Senior Judge Brown was authorized by law, and by this Court's March 4, 2025 Order, to consider and rule upon.

13. Judge Hilton intentionally violated this Court's March 4, 2025 Order and he intentionally denied Senior Judge Brown the right to rule on Relator's Motions, because he feared the rulings that would follow.

14. Again, this case involves a Presiding Judge and his co-conspirators that already know how this ends.

15. Presiding Judge Hilton and his co-conspirators have decided to drag this matter out as much as possible and hope for a miracle in the desperate attempt to avoid being held accountable for their actions.

16. Judge Hilton's May 21, 2025, Order denying Relator's Motion to Vacate directed at Senior Judge Brown was entered without subject matter jurisdiction and it must be set aside as well.

17. Judge Hilton had no subject matter jurisdiction to enter it and even if he did, only the judge that *signs* and *enters* the Order can consider whether she or he believes that a Rule 74.06(b) Motion is well-taken.²⁶
18. All of this follows the real hammer that Judge Hilton crushed Relator with in this case for going public and to the appellate courts with this case and the corruption within it.
19. Judge Hilton and his co-conspirators entered an *ex parte* TRO the day after Relator's prior Writ filings in this Court.
20. ***Less than 24 hours after*** Relator filed his Petition for Writ with this Court in Case No. ED113446, Judge Hilton took his children completely away.
21. Exhibit 1 to these Writ filings explain all of this in detail.
22. Losing his children completely, for the moment, is the cost to be paid by Relator for exposing the corrupt arm of the Republican machine in this Red State.
23. Again, those orders were null and void because Relator's February 27th and 28th Motions for Change of Judge were still pending.
24. No ruling came down on them until April 2, 2025.
25. It is because of the language of the Preliminary Injunction that Relator need not present a Motion to Dissolve the Preliminary Injunction.
26. As explained above, due its content and reliance upon a null, void and invalid foundation (TRO), that Preliminary Injunction must fall as a matter of law.
27. Of course, the same results follow for the other Orders Judge Hilton improperly entered without subject matter jurisdiction in this case.

²⁶ Here, this Court can address this issue as a matter of law based upon the undisputed court record.

28. For these reasons, Relator asks this Court to provide him with his first piece of justice in this long-fought battle.

29. While this Court is limited due to its appellate court nature, this Court has immense power in light of the evidence now before this court.

30. Judge Hilton caused a fraud on the Court of Appeals, the public's Missouri Court of Appeals.

31. Judge Hilton, the Presiding Judge of the 21st Circuit Court of the State of Missouri hid a ***momentous Order from the Missouri Supreme Court*** dated March 4, 2025, from Relator and, from this very Court.

32. That evidence alone is enough to start the process of the selection of a new trial judge in this matter.

33. Judge Hilton went a leap forward from just hiding the Order, he tossed it aside.

34. Judge Hilton went on and rejected this Court's appointment of Senior Judge Brown in this case by denying three (3) Motions directed only to Senior Judge Brown.

35. One: On May 21, 2025, Judge Hilton denied Relator's *New Evidence* Motion for Change of Judge for Cause seeking Judge Hilton's removal as trial judge in this case.²⁷

36. Two: On May 21, 2025, *Judge Hilton* denied Relator's Motion, pursuant to Rule 74.06(b), asking Senior Judge Brown to vacate Senior Judge Brown's own April 2, 2025 Order.

37. Three: On May 21, 2025, Judge Hilton denied Relator's Emergency Motion to Open the Courtroom and Partially Unseal the Court Record.

²⁷ This Motion included a formal Rule 74.06(b) motion and request to vacate Senior Judge Brown's April 2, 2025, Order entered *in absentia*. Ex. 1 (Exhibit Pages 1 through 112, footnotes 1, 3 and 58).

38. On May 30, 2025, Relator filed an Urgent Petition for Writs with the Missouri Court of Appeals raising the litany of improper actions and invalid orders entered by Judge Hilton.

39. On May 30, 2025, Relator filed a Motion to Partially Unseal both circuit court's non-CRIFS court record and the Eastern District Court of Appeals' non-CRIFS court record.

40. On June 3, 2025, Judge Torbitzky, on behalf of the Missouri Court of Appeals entered an Order denying Relator's *Urgent* Petition for Writs despite the clear language of Code of Judicial Conduct Rule 2-2.3 and Rule 2-2.11.

41. The evidence of bias that pours out of every page bearing Relator's words are enough to invalidate the Preliminary Injunction that keeps the children in this case from their father 100% of the time.

42. Justice. Fair. Impartial. Justice.

43. That is what Relator seeks from this Court.

III. FACTS

Taking chronologically, the relevant events began on February 27th and 28th, 2025. Those are the dates that Relator filed his prior Motion for Change of Judge based upon the very limited evidence available at that time. Ex. III (Exhibit Pages 733 through 750) and Ex. JJJ (Exhibit Pages 751 through 768). Missouri law is clear that Judge Hilton was stripped of subject matter jurisdiction until there was ultimately a ruling by Senior Judge Brown *in absentia* on April 2, 2025. Ex. F-3 (Exhibit Page 211).

During the intervening days when Judge Hilton lacked jurisdiction, he entered a litany of Orders that are invalid and null and void as a matter of law. Ex. KKK (Exhibit Page 769), Ex. LLL (Exhibit Page 770), and Ex. MMM (Exhibit Page 771).

Importantly, one invalid Order that Judge Hilton entered was an Order denying Relator's Motion to Vacate the October 2, 2025 Consent Order in this case

that was procured and is the result of fraud. Ex. KKK (Exhibit Page 769). While silent on the issue, Judge Hilton also entered what appears to be a *de facto* denial of Relator's Motion to Vacate the 2017 Modification Judgment in this matter.²⁸ *Id.* Compare Ex. HHH-1 (Exhibit Pages 692 through 708) and Ex. HHH-2 (Exhibit Pages 709 through 732) with Ex. KKK (Exhibit Page 769).

The October 2, 2025 Order and Judge Hilton's retaliatory denial of Relator's motion to vacate it was strategic and intentional. It is that Order alone, prior to the April 4, 2025 Preliminary Injunction to be discussed below, that keeps the children from their father 50% of the time as mandated in the current Parenting Plan.

Judge Hilton chose to deny that Motion that was argued almost a month earlier to send a message. It is a message that Judge Hilton continues to fire off at Relator over and over again: each time Relator takes a step to expose or further expose the corruption in the 21st Circuit Court, Judge Hilton will punish him immediately and make him pay dearly. That is exactly what Judge Hilton did when he formally denied Relator's Motion which sought to return to 50/50 custody.²⁹ Ex. KKK (Exhibit Page 769). He struck Relator where it hurt the most. Where it hurts

²⁸ Relator makes this statement solely for purposes of this *Urgent* Petition for Writs. Petitioner does not concede that any duty or time to file a Notice of Appeal ever began to run.

²⁹ Relator knew that Judge Hilton would eventually take his children away 100% of the time. That is the cost of the pursuit to end corruption in the 21st Circuit Court. Importantly, ***it is Relator's two children that primarily pay that cost***, not Relator. For that reason, this case remains beyond difficult to pursue. With each step forward, Relator knows that ***his children will suffer more and more*** until this Court finally steps in and takes action. It is not their choice. Relator is making it for them and he hopes one day they understand why he did not surrender and take the easy way out. As noted previously, someone must stop this madness that plagues the St. Louis County courthouse, whatever the cost.

the most for all parents. The very reason this corruption persists. This corrupt scheme's continued use of children as a weapon is atrocious.³⁰

After those February 28, 2025 Orders were entered by Judge Hilton without subject matter jurisdiction, the Missouri Supreme Court entered a *sua sponte* Order dated March 4, 2025, appointing retired Circuit Judge T. Lynn Brown as the Senior Judge for this matter only. Ex. 000 (Exhibit Page 773). It is worth noting that Relator's Motion for Change of Judge dated February 28, 2025 was filed on a Friday morning, Judge Hilton's improper Orders were entered later on that same Friday, and the Missouri Supreme Court *acted sua sponte the following Tuesday*. The swiftness also played a role in Relator's improper disbelief.

This very Court's March 4, 2025, Order was concealed by Judge Hilton, or at a minimum, it was strangely not published to the court docket in this case until March 27, 2025, *one day after* Relator's Petition for Writ in Case Number ED11344. Ex. 5 (Exhibit Pages 802 through 814), Ex. 6 (Exhibit Pages 815 through 925), Ex. 7 (Exhibit Pages 926 through 943), Ex. 8 (Exhibit Pages 944 through 961), Ex. 9 (Exhibit Page 962), Ex. 10 (Exhibit Pages 963 through 964), Ex. 12 (Exhibit Page 967), Ex. 13 (Exhibit Pages 968 through 969), Ex. 14 (Exhibit Pages 970 through 1024), Ex. 15 (Exhibit Pages 1025 through 1027). That fact alone requires Judge Hilton's removal. *See* Code of Judicial Conduct, Rule 2-2.11.

³⁰ *See* note 28 *supra*. Relator again notes that he is just one of the many victims. Past. Present. Future. This is why this Petition for Writ is of such great importance. This Court's ruling on this Urgent Petition for Writ chooses the *destiny* for so many children in St. Louis County for years and years to come. This Court may *never* again have another chance to protect Missouri's most vulnerable victims - **children**. That is what is at stake in these Writ proceedings. Judge Torbitzky did not deem these children and their futures worthy of any substantive written opinion. Relator's research to date confirms that each known member of the corruption or those otherwise with any connection to this case have children. It is simply unfathomable. It is unforgiveable. These are not one-time mistakes made without thought. These are systematic and intentional acts carried out over and over again. Relator remains dumbfounded at how the culpable individuals involved sleep at night.

This Court must have been monitoring this case and known that this Court's March 4, 2025, Order was not entered on the case docket. Presumably, Senior Judge Brown must have been watching, somehow, the new case for which he was pulled out of retirement to serve the public once more. Judge Hilton must have known that his actions and inactions were being monitored by this Court. Needless to say, this situation is simply unbelievable.³¹

Judge Hilton and the other individuals in this madness can pretend not to see the *immense magnitude* of what has happened so far, but Relator sees it. Relator relishes in it. Relator is confident this Court sees it and has been waiting to act.

On that same day, March 27, 2025, Judge Hilton retaliated against Relator for his March 26th Writ filings in this Court, and he immediately took his children away 100% of the time. *Id.*

Similar to his actions on February 28, 2025, on March 28, 2025, Judge Hilton entered more null and void orders as punishment. First, although knowing that Relator was out of town, Judge Hilton ordered him to undergo a hair follicle drug test in St. Charles, Missouri, based upon nothing but pure speculation. Ex. 19 (Exhibit Pages 1135 through 1136). As Relator has already documented at the trial court level, the Motion for TRO was filed in bad-faith. Ex. 20 (Exhibit Pages 1137 through 1150). Second, Judge Hilton granted Respondent Rebecca A. Copeland sole legal custody to continue the unnecessary therapy that was part of the corrupt co-conspirator's plan of ongoing parental alienation. Ex. F-2 (Exhibit Page 210). Judge Hilton arguable regained jurisdiction on April 2, 2025, when Senior Judge Brown issued a ruling on the February 27th and 28th, 2025 Motion for Change of Judge. Ex. F-3 (Exhibit Page 211). Then, on April 2, 2025, Judge Hilton entered a Preliminary Injunction *in absentia* that was based solely upon the language of the

³¹ Relator hopes one day to learn what was happening behind the scenes once he, Relator, somehow managed to put this case and the corruption in it, on the State of Missouri's highest court's radar. Relator notes that the OCDC remains no help, even now, so it is truly a mystery.

March 28, 2025, TRO that was invalid, null and void as a matter of law. *Compare* Ex. F-3 (Exhibit Page 211) *with* Ex. F-2 (Exhibit Page 210).

On April 25, 2025, Relator underwent 2 fair follicle tests to prove what everyone knew, he was no illegal drug user. Ex. I (Exhibit Page 245) and Ex. J (Exhibit Pages 246 through 248).

No further testing was needed for alcohol use as Respondent Rebecca A. Copeland and Guardian *Ad Litem* John Fenley received the more than 1,100 passing (100% passing) breathalyzer test results that spanned ***more than 14 months***, that Relator took, including on the days before, on, and after the TROs and the Preliminary Injunction hearings and orders. Ex. K (Exhibit Page 249).

The TROs and the Preliminary Injunction were nothing but *pure retaliation* for Relator's March 26, 2025, Petition for Writs filed with this Court in Case Number ED11344. All of this is laid out in detail in Relator's Supplement to his pending Oral Motion To Vacate And Dissolve April 4, 2025, Preliminary Injunction. Ex. 20 (Exhibit Pages 1137 through 1150).

On May 17, 2025, Relator filed a New Evidence Motion for Change of Judge for Cause that stripped Judge Hilton of subject matter jurisdiction once again. Ex. I (Pages 243 through 244) and Ex. J (Exhibit Page 246 through 248).

While Relator included a Rule 74.06(b) request in May 17, 2025, Motion for Change of Judge for Cause, he filed a stand-alone Motion on May 20, 2025. Ex. 5 (Exhibit Pages 802 through 814), Ex. 6 (Exhibit Pages 815 through 925), Ex. 7 (Exhibit Pages 926 through 943), Ex. 8 (Exhibit Pages 944 through 961), Ex. 9 (Exhibit Page 962), Ex. 10 (Exhibit Pages 963 through 964), Ex. 12 (Exhibit Page 967), Ex. 13 (Exhibit Pages 968 through 969), Ex. 14 (Exhibit Pages 970 through 1024), Ex. 15 (Exhibit Pages 1025 through 1027).

On the same day, May 20th, Relator filed an Emergency Motion to Open the Courtroom and Unseal the Redacted portion of the Court's docket. Ex. 16 (Exhibit Pages 1028 through 1085).

Faced with these three most recent filings from May 17th and May 20th, 2025, and having no subject matter jurisdiction in the case, Judge Hilton went forward with the hearing set on May 21, 2025, and he denied each of Relator's Motions, specifically the Motions directed to Senior Judge Brown and *those not even set for hearing*. Ex. 21 (Exhibit Page 1151).

On May 30, 2025, Relator filed an Urgent Writ with the Missouri Court of Appeals. Ex. 23 (Exhibit Pages 1154 through 1183). On June 3, 2025, without explanation and contrary to commonsense, Judge Torbitzky denied Relator's Urgent Petition for Writs, including the included Motion to Partially Unseal the trial court and the Court of Appeals' non-CRIFS court record, and refused to stay this case so that a thoughtful review could take place. Ex. 24 (Exhibit Pages 1184 through 1186), Ex. 25 (Exhibit Pages 1187 and 1188) and Ex. 28 (Exhibit Page 1203).

IV. RELIEF SOUGHT

Relator prays this honorable Court take a series of actions.

First and foremost, Relator seeks an immediate *stay* of all proceedings in the circuit court. The trial in this matter looms on **June 23, 2025** and Pre-Trial activities and filings are next due on **June 13, 2025**.

Additionally, Relator notes that he requests several types of relief. That relief includes, but is not limited to:

1. The immediate entry of an Order Staying this matter pending further ruling(s) from this Court;
2. Writs of Prohibition and/or Mandamus relating to the Missouri Court of Appeals' improper denial of Relator's May 30, 2025 Writ filings in that court;
3. Removal of Judge Hilton from this case for cause, or, in the alternative due to an appearance of impropriety;
4. The assignment of a new, democrat appointee trial judge from the western one half of the State of Missouri;

5. An Order Vacating and Setting Aside all of the null and void Orders improperly entered by Judge Hilton without subject matter jurisdiction, including, but not limited to the following:³²

a. February 28, 2025, Denial of Motion to Vacate October 2, 2025 Consent Order:

i. Relator seeks a ruling as a matter of law that the Motion should be **GRANTED** and provide such relief as the Court deems appropriate, including vacating the October 2, 2025

Consent Order and allowing Relator *at least* his normal, 50/50 Parenting Plan custody of the children;

b. February 28, 2025 Order:

i. Compelling compliance with discovery requests; and

ii. Placing restrictions on deposition of fact witness S.G.

c. March 28, 2025 Temporary Restraining Order (TRO)

d. April 4, 2025 Preliminary Injunction

i. Null and void and it relies solely upon and incorporates a null and void March 28, 2025 Temporary Restraining Order (TRO);

e. May 21, 2025 denial of Relator's *New Evidence* Motion for Change of Judge for Cause.

f. May 21, 2025 denial of Relator's May 17 and May 20, 2025, Rule 74.06(b) Motion to Vacate; and

g. May 21, 2025, denial of Relator's Emergency Motion To Open All Division 13 Hearings And Trial Days To The Public, and to Partially Unseal the Non-CRIFS Circuit Court record.

³² In the event it is not untimely and/or because each is plain error, Relator requests that this Court also vacate and set aside each of Commissioner Greaves' null and void Orders entered after December 2, 2024. Alternatively, Relator will seek this relief from the next trial judge.

6. Relator requests an Order from this Court compelling public access to the various redacted pleadings, and other non-CRIFS docket entries located in:

- a. Circuit Court Case No. 12SL-DR03959-02
- b. Court of Appeals Case No. ED113599; and
- c. This Supreme Court Writ case file.

7. Such further relief as this Court deems just and proper.

V. WHY A PRELIMINARY WRIT(S) SHOULD BE ISSUED

This Court should issue Preliminary Writs of Prohibition and Mandamus because the instant Writ proceedings present both an *urgent* and *unprecedented* situation of blatant, pervasive judicial corruption.

Most importantly, the children in this case continue to suffer and have no access to their father solely due to the ongoing criminal conduct, including extortion.

This matter is of such importance that the Missouri Supreme Court deemed it appropriate to issue a *sua sponte* Order dated March 4, 2025. These allegations have merit as the record reflects.

This matter is set to go to trial on June 23rd and 24th, 2025 before Judge Hilton - the very criminal that has committed these injustices and that has violated Relator's Due Process Rights over and over again. There can be no doubt that Judge Hilton must at least be removed as the trial judge in this case. No doubt whatsoever.

Relator's children have suffered long enough. The harm is *irreparable* but it can be stopped.

This situation cries out for justice. This situation cries out for action from this Court, Missouri's highest court.

WHEREFORE, Relator respectfully requests that this Court grant the relief the request herein and for such further relief as the Court deems just and proper.

Respectfully submitted,

/s/Mathew R. Grant

Matthew R. Grant, #50312

1625 Mason Knoll Rd.

St. Louis, MO 63131

T: (314) 412-9112

Email: mattgrant.stl@gmail.com

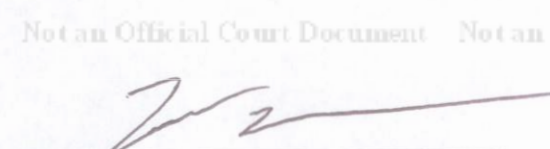
Pro Se Relator

NOTARY ACKNOWLEDGEMENT

State of Missouri)
County of St. Louis)

On this 9th day of June, 2025, before me, the undersigned notary, personally appeared Matthew R. Grant, proved to me through identification documents (a Missouri Driver's license), to be the person whose name is signed on the preceding or attached document, and acknowledged to me that he signed it voluntarily for its stated purpose.


Affiant


Notary

JOHN MUHRER
Notary Public, Notary Seal
State of Missouri
St. Louis County
Commission # 21073952
My Commission Expires 12-05-2025