

IN THE MISSOURI SUPREME COURT

STATE ex rel.)	
MATTHEW R. GRANT,)	Case No.
)	
<i>Relator,</i>)	EDMO Case No. ED113446
)	
vs.)	Cause No. 2012SL-DR03959-02
)	
The HONORABLE BRUCE HILTON,)	
Presiding Judge of the Circuit Court)	
of the County of St. Louis,)	
21 st Judicial Circuit, Division 13, and)	
The HONORABLE PHILIP HESS,)	
Missouri Court of Appeals for the)	
Eastern District of Missouri,)	
<i>Respondents.</i>)	

EMERGENCY PETITION FOR PRELIMINARY AND PERMANENT
WRITS OF PROHIBITION, OR IN THE ALTERNATIVE,
PRELIMINARY AND PERMANENT WRITS OF MANDAMUS,
BOTH RELATING TO JUDICIAL CORRUPTION WITHIN AT
LEAST THE 21ST CIRCUIT COURT OF
THE STATE OF MISSOURI

COMES NOW, Relator Matthew R. Grant ("Relator"), pursuant to Rules 97 and 94, and petitions this Court on an emergency basis, to issue Preliminary and Permanent Writs of Prohibition, prohibiting Circuit Judge Bruce Hilton from proceeding in the underlying action in any way other than to enter an administrative order transferring the underlying matter to the Missouri Supreme Court pursuant to MO.R.CIV.P. 51.05(e).

As is the discussed below and also in Relator's Suggestions in Support and his Motion for Security and Personal Protection, this matter is urgent as Relator is in grave danger and is currently in hiding in a foreign country so that he can bring this matter to this Court's attention. This additional set of filings was totally unnecessary and only served to provide Judge Hilton and his co-conspirators more

time to assassinate Relator. Hopefully, this Court will consider that fact when it evaluates the actions of Judges Hess and Clayton. If those Judges have not alerted this Court of the judicial corruption brought to their attention last week, that is a signal of potential, if not likely, participation.

A. PRESIDING JUDGE HILTON OF THE 21ST JUDICIAL CIRCUIT:

As his first alternative request, Relator requests that this Court issue Preliminary and Permanent Writs of Mandamus and/or Prohibition ordering Judge Bruce Hilton to transfer the underlying matter to this Court pursuant to MO.R.CIV.P. 51.05(e), so that it can rule on Relator's Motion for Change of Judge filed in the Circuit Court and Supplemented in the EDMO Court of Appeals to demonstrate actual "cause" relating to Judge Hilton's corruption. As will be revealed in these filings, Judge Hilton is the ringleader of judicial corruption in the 21st Circuit Court of the State of Missouri and his actions, along with Special Representative of this Court's Office of Chief Disciplinary Counsel "OCDC" Maia Brodie, Guardian *Ad Litem* John Fenley, and underlying Respondent Rebecca A. Copeland are unspeakable.

As his second alternative request, Relator requests that this Court enter Writs of Prohibition and/or Mandamus to Judge Hess of the Missouri Court of Appeals for the Eastern District of Missouri who improperly ignored Relator's meritorious Motion to Disqualify the Entire Eastern District of Missouri and, instead, ruled upon (actually denied) Relator's Petition for Writs filed in that Court. Judge Hess' denial was an obvious misapplication of Missouri Law regarding Judicial Canon and Code Rule 2.2. After, almost intentionally, misapplying this Courts mandator guidance on the application of Rule 2.2, Judge Hess then denied Relator's Petition for Writs under the guise that it was some

form of assistance. Nonsense. Relator requests this Court consider Judge Hess' actions.¹

B. RELATOR'S PETITION FOR WRITS THAT WERE IMPROPERLY CONSIDERED BY THE MISSOURI COURT OF APPEALS FOR THE EASTERN DISTRICT OF MISSOURI AND RELATOR'S MOTION TO DISQUALIFY THE ENTIRE EASTERN DISTRICT OF MISSOURI

As noted above, because Judge Hess of the Eastern District Court of Appeals improperly disregarded Relator's *well-grounded* and fully supported Motion to Disqualify the Entire Court of Appeals based upon solid evidence of an appearance of impropriety, it may be that procedurally, that Judge Hess's actions are what this Court feels it must address first.

1. Judge Hess Improperly Adopted the Standard for Change of Judge for "Cause" as the same standard for Change of Judge due to an "Appearance of Impropriety" under Rule 2-2.11.

Relator's Motion to Disqualify the Entire Eastern District of Missouri was ignored by Judges Hess and Clayton, because they believed that it was determinative that Relator "concedes 'he has no personal knowledge of any corruption within the Missouri Court of Appeals for the Eastern District of Missouri.'" Ex. 63. (Exhibit Pages 968-969).

If Relator had evidence that he believed could satisfy the high burden of proving *actual corruption* within the Eastern District Court of Appeals, Relator would have filed his Motion to Disqualify under Rule 2-2.11(A)(**1**) and asserted actual bias. Judge Hess and Clayton's tortured interpretation of Rule 2.11 ignores the rather basic legal principle that "actual bias" is just one of many ways in which a judge's impartiality may be reasonably questioned as judged from the perspective of a reasonable person. This is law 101 basic teachings. How Judges Hess and Clayton obtained such a flawed result is concerning to say the least.

¹ The fact that there was a concurrence by Judge Clayton is alarming.

Instead of the standard that Judges Hess and Clayton incorrectly claim applies, which does not, Relator alleged that the objective evidence he produced demonstrates an appearance of impropriety. That evidence is two-fold. First, Relator signed an Affidavit (Exhibit A thereto) and confirmed that Judge Hilton guaranteed that the EDMO would stall Relator's Motion and this entire case if Relator sought assistance from the EDMO Court of Appeals. Ex. 62 (Exhibit Pages 948-957). That is not an allegation that every single appellate judge is corruption, but rather, that the corruption in which he is involved would ensure that Relator's appellate efforts would land with a PANEL that would provide him no assistance. Judge Hess and Judge Clayton's ruling seems to suggest that Judge Hilton may have been directly on point in his allegation. But the conclusion on that issue is irrelevant to the fact that Relator provided much more evidence on Judge Hilton's claims.

Judges Hess and Clayton totally ignored that fact that Judge Hilton's statement are backed up by *his actions*. As Relator pointed out to the Judges Hess and Clayton, Judge Hilton blatantly disregarded this Court's mandate in *Matter of Buford*, 577 S.W.2d 809 (Mo. banc 1979), when he not only failed to transfer Relator's Circuit Court Motion for Change of Judge, but he went so far as to enter rulings directly prejudicial to Relator. Not one, but three (3)! All three entered the very next morning after Relator filed his Motion for Change of Judge directed at Judge Hilton himself. Ex. 62 (Exhibit Pages 948-957) and Ex. 61 (Exhibit Pages 920-947).

Matter of Buford, 577 S.W.2d is clear that Judge Hilton could not rule on whether he himself, should be disqualified. That is the same mistake that Judges Hess and Clayton made. The entire point of *Matter of Buford* is that unless a filing is a baseless effort filed without any justification whatsoever, the judge that is the subject of the Motion for Change of Judge must transfer the matter to another, impartial judge for she or he to rule whether or not the judge that is the subject of Motion for Change of Judge should be disqualified and the requested

change should be granted. Relator even noted in his EDMO Motion to Disqualify, that his EDMO Petition for Writ was filed solely based upon Judge Hilton's "appearance of impropriety," which is more than enough, as he was waiting for Judge Hilton to expose himself and his participation in the corruption ignoring the mandate of *Matter of Buford*, and he took retaliation against Relator for pointing out the truth and sought to bring the truth to this Court's attention.

That is why Relator supplemented the record at the trial court with Judge Hilton's actual bias as reflected in his February 8, 2025, post-Motion for Change of Judge filings directly prejudicial to Relator and Relator even supplemented the trial court record with his January 28, 2025, *ex parte* TRO submission that Judge Hilton rejected. Judges Hess and Clayton *strained* more than any appellate judge has ever strained before to ignore the fact that Relator presented evidence not only of Judge Hilton's actual bias, but also, that the very same evidence supported Relator's Motion to Disqualify. What likely happened is obvious, at least to Relator. Relator has intimate knowledge of the tactics used to keep the corruption in the 21st Circuit Court a secret. In sum, Judges Hess and Clayton did Relator no favors with their Order of Denial. Ex. 63 (Exhibit Page 958-959). Whether their ruling was truly just plain error, doesn't really matter at the end of the day. However, in light of this situation, Relator points it out so that this Court can objectively determine on its own what happened. That is all Relator seeks, is this Court to finally review the trial court, and now appellate court record in this case.

The proof of ***judicial corruption*** in this case is everywhere like flares in the night sky.

As noted above, this Court has the option to issue Writs of Prohibition and/or Mandamus Prohibiting the EDMO Court of Appeals from refusing to transfer this matter so that this Court can rule on Relator's Motion to Disqualify the EDMO Court of Appeals, but what is most important is that this Court review Relator's Motion for Change of Judge relating to 21st Circuit Judge Hilton.

As an alternative on this issue, this Court has the power to transfer the underlying matter to itself so that it can consider all of these issues. Relator urges this Court to take this route.

So long as this Court reviews Relator's *Verified* Petition for Writs that he filed with the Court of Appeals for the Eastern District of Missouri, **Ex. 61**

(Exhibit Pages 920-947) and this Petition for Writs and the Suggestions in Support, Relator has no doubt that this Court will make the correct rulings.

Relator need not waste any time to show this Court what he believes is evidence of the judicial corruption at issue. If Relator is correct, which he knows he is, this Court will be alarmed when it sees that Judge Hilton entered a *fake* Order purportedly signed by Chief Justice Mary Russell on behalf of an **en banc court**. As such, every single Missouri Supreme Court judge should also be familiar with, and have approved, the ruling below. Relator is willing to bet his bar license that none of the judges of this Court has reviewed anything about this case and never consented and agreed to the **en banc** ruling below.

FILED

MAR 04 2025
IN THE SUPREME COURT OF MISSOURI
EN BANC
JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY
March 4, 2025

Pursuant to the provisions of Section 26.3 of Article V of the Constitution of Missouri, It is ordered that:
THE FOLLOWING JUDICIAL PERSONNEL:
THE HONORABLE T LYNN BROWN (35877)
BE ASSIGNED AS A SENIOR JUDGE WITH CONSENT TO THE FOLLOWING COURT OR DISTRICT:
21st JUDICIAL CIRCUIT (ST. LOUIS COUNTY)

IN THE MATTER OF:
MATTHEW R GRANT VS. C M G ET AL, CASE NO. 12SL-DR03959-02

All to proceed in accord with the local Presiding Judges orders and those of the Supreme Court. This order is to include any judicial activity necessary to complete the assignment, including after-trial proceedings.


Mary R. Russell, CHIEF JUSTICE

STATE OF MISSOURI - SCT.:

I, Betsy LedgeWood, Clerk of the Supreme Court of Missouri, do hereby certify that the foregoing is a true copy of the order of said court, entered on March 4, 2025 as fully as the same appears of record in my office.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Supreme Court. Done at office in the city of Jefferson, State aforesaid, March 4, 2025.


 Court Clerk
 D.C.

Exhibit 66

TNR: 63547

000907

Ex. 66 (Exhibit Page 997).

If Relator is correct, the Order reflected above is not legitimate, was created by Judge Hilton and his co-conspirators and this Court should pull every alarm and call all hands-on deck.

Relator knows that Judge Hilton is a criminal, as is OCDC Special Representative Maia Brodie, Guardian *Ad Litem* John Fenley, and underlying Respondent Rebecca A. Copeland. As explained herein, the corruption is vast and includes many, many more individuals, including the OCDC, and more state and federal offices than this Court can imagine. Indeed, Relator is placing himself in **grave danger** by exposing what has been and is going on in at least the 21st Circuit Court.

C. URGENT RELIEF REQUESTED REGARDING EXISTING ORDER

Additionally, Relator petitions this Court to issue a Preliminary and Permanent Writ of Prohibition, prohibiting Honorable Bruce Hilton from enforcing at least the three (3) Orders he entered after February 27, 2025 (e.g., on February 28, 2025) and further prohibiting his entry of any further orders other than those requested herein, those entered by this Court, or those entered by the Missouri Supreme Court.

Since Judge Hilton entered the three (3) orders that Relator brought to the attention of the EDMO Court of Appeals, Judge Hilton has now entered two Temporary Restraining Orders against Relator taking away the little time that he was allowed with his Children. Ex. 65 (Exhibit Pages 963-996).

In light of the above, and again in the alternative, Relator requests that this Court issue a Preliminary and Permanent Writ of Mandamus and/or Prohibition ordering Judge Hilton to vacate and set aside at least the three (3) Orders he entered after February 27, 2025 (e.g., on February 28, 2025), and issue a similar preliminary writ of mandamus relating to the current TRO that Judge Hilton will surely convert into a Preliminary Injunction once he learns of this filing, and issue

a stay in the Circuit Court case or some other manner of protection to prohibit more orders from being entered against Relator for this filing.²

Because the ruling at issue required Relator to take action by March 28, 2025, and that date passed with no temporary Writ issued from this Court because the EDMO Court of Appeals improperly diverted and delayed this matter, Relator is in a quandary. Relator is faced with an invalid Court Order, but a Court Order nonetheless, that requires action that has not been taken. As March 28, 2025, passed with no relief from any court, Relator agreed to comply with the Order on April 4, 2025, at a fake hearing that Judge Hilton created to create an opportunity for the murder of Relator, as Relator is confident that the purported Order assigning retired Judge Brown to this case is not legitimate. Relator is confident that Chief Justice Mary Russell of this Court did not enter the Order oddly dated March 4, 2025, and entered on the Court docket by Circuit Judge Hilton.

Petitioner has recently fled from the United States in fear for his life. It is fortunate that he did as the actions of Judge Hilton and his co-conspirators prove that they plan to have Relator murdered. It is hard to believe but it is true. The reality of how the conspirators have reacted to Relator's filings, proves that Relator is in *grave danger*.

1. Relator Is In Hiding In A Foreign Country Due To The Grave Danger His Is In And The Plans That Judge Hilton Has Already Adopted – Murder

As will discussed in more detail below and in Relator's other filings, he seeks a prompt ruling from this Court and *some or any form of protection* this

² Relator is confident that he has handled these requests in precisely appropriate procedural manner. However, in the event his is incorrect, as he is no appellate lawyer, Relator requests his filings be considered direct Petition for Writs Petition via any potential interpretation of Article V, Section IV of the Missouri Constitution this Court choose, any other extraordinary writ or even an appeal of Judge Hess and Judge Clayton's Order.

Court might be able to facilitate so that he can return back to his home in St. Louis, Missouri.

If Relator is wrong and the Order from Chief Justice Mary Russel is real, then Relator still seeks confirmation of that fact as none of the surrounding objective facts suggest that it is real.

Relator knows that he is correct. That is precisely why Relator fled the United States.

D. SUPPORT FOR PETITION FOR WRITS

In support of his Petition, Relator states:

1. Finally, finally the day is here that Relator's months of strategies, tactics and filings provide him the proper procedural route to bring vast judicial corruption to this Court's attention. Relator has placed his life in danger and continues to do so in order make this filing and expose the expansive Judicial Corruption throughout the 21st Circuit Court – at least with some of the judges appointed to the bench by a Republican Governor.
2. It is with relief that Relator can do what he has agreed to sacrifice so much to do – file this Petition and the relating filings to once and for all put a stop to the abhorrent corruption that St. Louis County families have suffered.
3. Children have suffered to generate stolen money and it is despicable. Knowing what he was doing to his own chances to live much longer, it is Relator that is making the personal sacrifice necessary to stop this behavior.
4. Relator has acted because he knows from the mouth of St. Louis journalist that in the past others have had similar facts and knowledge but have refused to go on the record and go public. Relator understands and does not pass judgment on these individuals.

5. Relator simply believes that it is he that must make the sacrifice as it is most likely that no one else will agree to voluntarily trade their own life to expose the truth. While difficult, in the end the decision was easy. What was the right thing to do? Relator did it realizing the consequences to himself, his children and his wife. This is a terrible situation that Relator can barely type, the reasons for which will become apparent.

6. As will also become apparent, now this filing has taken place, all co-conspirators are personally best-served by ensuring Relator's continued survival.

7. Relator will explain to all known and unknown co-conspirators that read these filings why it is objectively in all of their best interests to not murder Relator as they clearly plan to do.

8. It is Relator that will bring them a lesser sentences and punishments to the extent he can. The key point is that Relator will do that not because it will keep him alive, he will do it as he will set aside his anger and rage and he will advocate for each individual involved to have a second chance.

9. Relator is only alive today because a trip to a Rehabilitation facility in March and April, 2024, provided him a second chance at a productive life and to fight his alcoholism.

10. Relator has never hidden his disease. Because it is a disease. Our profession needs to be open to discussing the environments that we create that feeds these diseases.

11. Relator does not think these environments will change, most are social drinkers and that is amazing for them. Instead, Relator seeks to also place a spotlight on his disease and later his unfortunate departure as an Equity Partner at Husch Blackwell LLP.

12. Relator has agreed to an unenforceable non-disclosure provision. In fact, Relator demanded it. It is hindsight that Relator understands that hiding what happened to him at an AM Law 100 law firm due to his disease needs to come out. That will happen, but not here.

13. The underlying child support and child custody matter involving Relator's children and how ***blatant judicial corruption*** has been used against him, just like so many others, to withhold his children in order to generate fees that were unnecessary, and ultimately, potentially for the Missouri or national Republican party. Only following the trail of stole money will prove why this corruption has existed for so long. And why Judges and lawyers have agreed to take part in it.

14. Relator is dumbfounded that there could be any monetary or other incentive large enough to turn an otherwise good person into one of the criminals that have participated in this corruption, but he nonetheless acknowledges that it must exist.

15. Relator can guarantee that none of the corrupt conspirators would trade their life for anyone. That is a guarantee.

16. What has happened to Relator and his children by Commissioner Greaves, and now Presiding Judge Hilton, is ***unfathomable***.

17. It is time for someone to do whatever it takes to stop the corruption that he can prove has taken place in his case and surely others.

18. And that is important, Relator is just one of so many victims past and present. The rumors are true! The 21st Circuit Court, to a large extent, is corrupt. The 21st Circuit's (St. Louis County's) family court is plagued by corruption and children and parents have suffered and are suffering now, just like Relator who now has no custody of his children because he filed a Petition for Writ with the Missouri Court of Appeals for the Eastern District of Missouri.

19. Relator's filings will demonstrate the punishment that Judge Hilton has handed out to Relator for his refusal to surrender or submit.

20. Relator will prove that Judge Hilton, John Fenley, Maia Brodie and Rebecca A. Copeland, have actively plotted Relator's murder.

21. It is what it is. It is exactly what Relator volunteered for, if necessary. The murder plot is no surprise at all. It was entirely anticipated as proven by Relator's departure from the United States to attempt to hide in a foreign Country.

22. That is where these pleadings are being typed, from a room in a foreign country where Relator prays to live long enough to just get this on file.

23. As noted above, with the plan now exposed, if Relator is indeed murdered, each and every co-conspirator will suffer the harshest of sentences.

24. Instead, Relator, the same person who will die for strangers, will also advocate for even those that were going to kill him get a second chance.

25. Without a second chance, Relator would not be alive today. That is a fact. Relator's wife is solely responsible for Relator's recovery and he takes this opportunity to make that known. As she may desire some anonymity, she will not be named here. But Relator will not assume the risk of being murdered after this filing without giving her public recognition. She is a truly good person. If Relator has substantial good in him, which he believes he does, it nothing compared to the good that is in the heart of his wife.

26. Now back to business.

27. The corruption Relator now exposes through this Petition, the intentionally overboard exhibits, and that the Missouri Supreme

Court will find on the court docket in this case is not only unfathomable, it is not limited to just one judge.

28. In contrast, it involves the Presiding Judge (Hilton), a sitting Commissioner (Greaves), current and former counsel of record (Brodie, Fenley, Eilerts and Coulter) and it extends to and involves various courthouse staff and personnel.

29. Within the Courthouse, the corruption in the underlying case involves unethical and improper conduct by *at least* the following:

- i. Commissioner Mary W. Greaves;
- ii. Presiding Circuit Judge Bruce Hilton;
- iii. Respondent's counsel Maia Brodie, *Special Representative of the Office of Chief Disciplinary Counsel* of the Missouri Supreme Court;
- iv. Relator's former counsel Mat G. Eilerts of the law firm of Growe Eisen Karlen Eilerts;
- v. Each of the named partners in the law firm of Growe Eisen Karlen Eilerts: Gary Growe, Richard Eisen, Christopher Karlen, and Mat Eilerts;
- vi. Relator's former counsel C. Curran Coulter; and
- vii. Guardian *Ad Litem* – John Fenley.

30. Many other individuals are known to be involved. As noted herein, Respondent in the underlying matter, Rebecca A. Copeland, is intimately involved in all aspects of the conspiracy even if she does know the list of co-conspirators or how the stolen money is used.

31. Further, the corruption goes far beyond those already identified. There are others. Many will escape discovery and/or accountability, but there are many, many other judges, commissioners, Guardian *Ad Litem*s, and the approximately seventy (70) lawyers that Mr. Mat G.

Eilers and C. Curran Coulter estimated. Those two know, because they are both part of the corruption.

32. The underlying matter should have been a simple child custody and child support matter. It was and is not.

33. The underlying matter has involved the *theft* of Relator's savings and the withholding of Petitioner's children from his custody as leverage to attempt to force Relator to submit and yield and allow the corruption to continue.

34. As discussed below, the corruption involving Presiding Judge Hilton has presently resulted in the wrongful denial of Relator's right to an Order transferring the underlying matter to the Missouri Supreme Court. A blatant violation of *Matter of Buford*, has gone unaddressed, even by an appellate court judge that was appointed by a Democratic Governor.

35. The denial is based upon Presiding Judge Hilton's fear that the *Missouri Supreme Court* will learn of the illicit, improper, unethical, and criminal conduct that has taken place in this matter and that is commonplace in the 21st Circuit Court.

36. Relator notes that Missouri Supreme Court Chief Justice Mary Russell is an appointee of former Governor Jay Nixon. The critical importance of that fact, appointment by a Democratic Governor, will become apparent. It is what Judge Hilton fears most. A seemingly incorruptible Chief Justice that was appointed by a Democratic Governor that has no reason to allow this Republican-based corruption to go unaddressed. Instead, Judge Hilton knew that either the Chief Justice or the other judges of the Missouri Supreme Court would shut this corruption down and be sure he and his co-conspirators were held fully accountable.

37. Upon information and belief, the corruption that Relator now exposes relates to *many* Republican Governor judicial appointees.

Not all. Not all in any way. At least, Relator has no information to make a good-faith based allegation to that effect. Indeed, it is more likely that the appointments of illicit judges were strategic.

38. The corruption ***is the result of the Missouri legislature's adoption of the Missouri Nonpartisan Court Plan.*** Whether it was intended is speculation, but Relator can assure all those that read this and his other filings, that it has been and is being used to cement corruption with the courts of the State of Missouri. Missouri is a red state. And the Republicans have appointed corrupt judges in many places.

39. Relator notes that he is a former equity partner of Husch Blackwell LLP.

40. Relator practiced at Husch Blackwell LLP and under its former name for ~21 years.

41. Husch Blackwell was led by former Chair and well-known Republican Catherine Hanaway.

42. Relator has intimate knowledge of Republican politics in this State.

43. His old office at Husch Blackwell was approximately five (5) doors down from Ms. Hanaway's office.

44. Based upon information last available to Relator, Ms. Hanaway is still an equity partner at Husch Blackwell LLP and she leads that firm's White Collar, Internal Investigations, & Compliance practice group.

45. Ms. Hanaway spent five years on staff for Republican U.S. Senator Kit Bond.

46. Ms. Hanaway is the first and only female to serve as speaker of the Missouri House of Representatives. She served as a Republican.

47. Ms. Hanaway is a former Republican United States Attorney for the Eastern District of Missouri and was appointed to that position by Republican President George W. Bush.

48. When Republican President George W. Bush appointed Ms. Hanaway as United States Attorney for the Eastern District of Missouri in 2001, President G.W. Bush's United States Attorney General that was also appointed in 2001 was *Missouri* Republican John Ashcroft.

49. John Ashcroft was a former Republican Senator in the United States Congress from the State of Missouri from 1995 to 2001.

50. When Ms. Hanaway left her role as United States Attorney for the Eastern District of Missouri, she joined former United States Attorney General John Ashcroft, at his law firm.

51. As a former law partner of Ms. Hanaway, and a former equity partner of Husch Blackwell LLP, Relator possesses unique and personal knowledge that this Court and the Missouri Supreme Court should take *very* seriously.

52. Obviously, Relator cannot disclose certain aspects of information he possesses that is protected by attorney-client privilege.

53. It is no secret that Ms. Hanaway represented former Republican Governor Eric Greitens in matters relating to his resignation from that office. That fact was not kept confidential within the firm of Husch Blackwell LLP so if it was intended to be confidential, others have already placed that information in the public domain.

54. Former Husch Blackwell LLP attorneys include sitting United States District Judge Matthew Schelp, former United States Attorney Jeff Jensen, and current Assistant United States Attorney Derek Wiseman.

55. Relator wants to be clear that he makes no allegations of wrongdoing by District Judge Schelp or former U.S. Attorney Jeff Jensen.

56. Relator also wants to emphasize that Derek Wiseman is a criminal and part of this corruption.

57. Relator knows that Ms. Hanaway played the key role in the ascension of the forgoing individuals to their respective past and/or present positions, as applicable.

58. Ms. Hanaway is a, if not *the*, Republican powerbroker that, upon information and belief, is a key fact witness in this matter.

59. Relator knows that he is immune from any defamation claims for what he asserts in these pleadings, but he assures this Court that he would not make any allegations that he did not believe to true.

60. Not only has Relator not been contacted or interviewed, the information that Relator provided appears to have been shared with other co-conspirators and used against him through at least strategic moves.

61. Husch Blackwell's lawyers talk too much and they do so in front of and with third parties thereby waiving any confidentiality that otherwise would protect any sensitive information. Relator is not included in that description.

62. However, Relator believes strongly that the privilege does belong to the clients and he will not be the one to betray them, even though their white collar defense attorneys have.

63. As is very relevant, Relator possesses *very, very substantial and valuable* civil claims against Hush Blackwell LLP regarding its and

its partner's conduct, at least, after his July 31, 2023, resignation as an equity partner in that law firm.

64. Relator cannot yet prove but knows he could prove if allowed that Husch Blackwell is intimately involved in the corruption at issue.

65. Relator notes that Husch Blackwell was served a subpoena *in this underlying case* and *entered its appearance*.

66. It is Relator's understanding, that Husch Blackwell's counsel received or had access to many if not all of the filings in this matter until very recently.

67. Petitioner omitted certain facts from his filing with the Eastern District Court of Appeals in order to potentially allow him to live a bit longer if things went South - and went South they sure did.

68. Now is the time to disclose to everyone that the corruption in this case not only goes to as high as the office of the United States Department of Justice via Eastern District U.S. Attorney's office of Sayler Fleming and Assistant U.S. Attorney Derek Wiseman. It goes even higher!

69. Relator can *now* finally expose that *he reported the corruption* within the EDMO U.S. Attorney's Office, *to the United States Department of Justice's head office in Washington D.C.*

70. Specifically, Relator reported the corruption within the EDMO office to the United States Attorney General's main office in Washington D.C. via its online system located at: <https://www.justice.gov/action-center/report-crime-or-submit-complaint>

71. As Relator knew that Republican politicians would protect one another, Relator made sure he *waited until several days after United States Attorney General Pam Bondi was confirmed by the United States Senate on February 4, 2025.*

72. Relator knew it was 99.9% likely that his report to Ms. Bondie's office about a Republican U.S. Attorney's Office would not be investigated and that he would not even be contacted. He was absolutely correct. Relator notes that Ms. Fleming was appointed by William Barr and also served throughout the Biden administration.

Quite an odd situation. Republicans and Democrats working together, just like in the Missouri Court of Appeals for EDMO.

73. Relator still has never been contacted by anyone associated with the United States Department of Justice (DOJ) or the Federal Bureau of Investigation (FBI), or any other federal office or agency about his report and complaint.

74. While Relator does not have enough information to allege that Ms. Bondi was personally involved, at least her office sure was. The buck stops with her and the public must demand her to act. And to act quickly and decisively.

75. Relator's personal suggestion is that Ms. Bondi immediately make a recommendation to the Chief Justice John G. Roberts, Jr. of the United States Supreme Court so that he can consider whether he deems it appropriate to appoint a Special Division to select an independent counsel.

76. Because Relator's evidence of corruption reaches to the United States' top prosecutor's office, he can think of no other way that the United States Department of Justice can be fully and fairly investigated. It must be done by an unbiased individual and her or his team. Certainly, the DOJ cannot be allowed to investigate itself.

77. Relator notes that the State of Missouri faces a similar quandary. The corruption in this case extends for high and is so wide that no typical prosecuting authority can be trusted and used. The St. Louis County prosecutor's office is too closely connected to Republican

politics so there is at least an appearance of impropriety there.

Similarly, the United States Attorney's Office for the Eastern District of Missouri cannot be used as it is a proven part of the corruption. Relator has no time to research the solution here but he trusts that the Missouri Supreme Court will push this matter in the right direction.

78. As to the Department of Justice, Relator notes that he voted for President Trump. But President Trump's administration *at least* inherited corruption and the President damn well better do something about it.

79. Finally, and again, Relator does not expect others to do what he is doing.

80. It takes a unique person to volunteer to accept the likely and now confirmed plans of her or his assassination.

81. Relator wants to highlight that he is no better than anyone else with good in their heart. As the Missouri Supreme Court will read in his circuit court pleadings, Relator is the one who recently hit rock bottom via alcoholism and now sees how well he had it for so many years. While Relator emphasizes that he had the skill and put in the effort to earn his prior equity partner role – which he should still have - Relator has a new viewpoint on why his life was spared, with the help of his loving wife.

82. Relator admits freely that he had suicidal thoughts in Spring 2024. However, he has never made any effort to take actually his own life.

Relator admits this very personal information publicly to expose the dangers of alcoholism and some of the very real mental health issues that exist in the legal profession. Relator knows for a fact that he is not alone as a Missouri in that past, very dire situation.

83. Stress from being an attorney coupled with alcoholism and, for Relator, depression too, makes for a deathly combination.

84. Despite what Judge Hilton has claimed in open court, the improper *ex parte* TRO in the underlying TRO had *no influence* on Relator's decision to go to rehab.

85. Relator and *his wife* had begun researching dual diagnosis facilities long before that TRO was entered.

86. It is his wife, the excellent folks at Oro House Recovery Center in Los Angeles County, California, and the program at Alcoholics Anonymous (AA) that helped Relator recover and start over anew.

87. Judge Hilton and Ms. Copeland think much too highly of themselves if they think the *ex parte* TRO did anything to help. Indeed, it was harmful and hurt Relator's chances of success.

88. The *ex parte* TRO allowed Relator no contact with his children, even via text. That is simply absurd. It was renewed when everyone knew that Relator was in a rehab facility in California. Texts are documented and Relator could have been held accountable in the almost impossible situation where he would text any inappropriate words to statements to his own children. They were 12 and 14 at the time. Relator knows and firmly believes that the "no contact" TRO was the first time Ms. Copeland and her two (2) accomplices, both relatives of Relator, decided that Relator needed to die.

89. One of those relatives even went to the effort to push for the cancellation of Relator's health insurance so that he could *not* go to Rehab. The terrible individual will claim that she was trying to help, but any objective person looking at the evidence knows that the plan was for Relator to be pushed into such a depressive state that he would take his own life. It is absolutely true, the evidence proves it.

90. Not to be a broken record, but again, Relator firmly believes that he was saved and placed in this situation, in this moment, to do what no one else likely ever will - make the ultimate sacrifice.

91. You see, Relator believes that he is already living on borrowed time that he otherwise would not have, so ending it sooner than it would now end naturally, is something that is barely acceptable.

92. The fact of the matter is that someone had to step up and stop this corruption. Someone had to protect the future children!

93. Why should that *not* be Relator? That is the final question Relator had to answer. The question is not “why should it be Relator”? That misses the point.

94. There is no good reason why *he* should not be *the one* to literally take the bullet that is required to stop this longstanding and destructive corruption!³

95. There is no good reason why it should *not* be Relator, therefore, it *must* be Relator.

96. As Relator recently explained to one of his children so that Rebecca A. Copeland would be held accountable in some manner even if Relator never lived to see this filing; it is important to do what is right. That is the legacy Relator has chosen to leave to his children and his wife. They will undoubtedly suffer. But Relator hopes that in time they will see that their suffering was necessary as well for the greater good!

³ The prior attempt to frame Relator for attempted kidnapping suggests that Judge Hilton, Maia Brodie, John Fenley and Rebecca A. Copeland, among others, had a plan to have Relator placed in county jail where someone inside would do the dirty work for them. Presumably, that may still be the plan although a rifle shot is more likely. Hopefully, we don’t find out.

97. Sometimes one person must sacrifice for the good of others. Just ask any past or present member of any branch of the military. Relator is not unique, he is just going to battle in a different theatre of war. He is just a soldier just like the others before him and no better than those that passed before him as well.

98. So this surely sucks to use a non-legal term, but someone has to charge the hill or attack the beach, pick your analogy, knowing they will most certainly die. Relator needs no superior officer to direct him to do what must be done.

99. In an attempt to save time and get this on file as soon as possible (the conspirators have surely learned where Relator is hiding), Relator now simply reiterates much of what he included in his *Verified* Petition for Writs field with the EDMO.

100. Again, the Office of Chief Disciplinary Counsel is corrupt. The Missouri Supreme Court must learn that fact and Relator trusts that the Court will take all necessary measures to prosecute ferret out those involved. But yet, many will not be uncovered even they too are corrupt and Relator trusts that the Missouri Supreme Court adopts measures to be sure this never happens again, not only in any circuit court but also not in its own Office of Chief Disciplinary Counsel.

101. Relator has gone to painstaking measures to develop objective evidence of corruption as is discussed below.

102. Indeed, Relator's filing with the Eastern District Court of Appeals was partly intended to see what the appellate court judge(s) assigned, now known to be Judges Hess and Clayton, would do.

103. Much as expected and to Relator's dismay, Judge Hess denied Relator's Petition without even transferring his meritorious Motion to Disqualify for this Court to rule upon. The time that his ruling

provided just so happened to allow for a window of assassination.

Why these judges did what they did is unknown. But he clearly chose the absolutely most difficult path for Relator. Relator suggests that is no coincidence. It is possible that this Court will legitimately find that Relator's legitimate paranoia has overtaken his reasoning in this instance. Relator thinks not.

104. Relator fears that some judges will determine that the Missouri Court system cannot survive this sort of scandal. They are wrong.

105. It is **ONLY** the public disclosure of this scandal and chasing every co-conspirator down every rabbit hole, that will build the public's trust in a system that **they absolutely should NOT TRUST** at this moment.

106. While Relator trusts that the Missouri Supreme Court will do the right thing, he leaves nothing to chance when he likely giving his own life for this.

107. Relator has ensured that this scandal and situation leaks in the event the Missouri Supreme Court attempts to keep it under wraps.

108. The fact of the matter is that Relator has given too much and too many judges from both parties have **NOT** followed their judicial oath.

109. Relator simply leaves nothing behind to chance.

110. If this Court does not issue a Preliminary and Permanent writ orders of prohibition and/or mandamus, or otherwise take over this case, the 21st Circuit will continue along its path of widespread Republican judiciary corruption and Presiding Judge Hilton will continue to punish Relator, if he lives, for his efforts to expose the truth and obtain his normal 50 50 custody of his Children.

111. Relator has proven with an unbeatable breathalyzer that he has been 100% sober for over a year.

112. And now, his one night a week, a five hour visit each Wednesday, and a four hour visit every other Sunday have all been taken away and he now has no visitation and no custody. Because he chose to expose the corruption.

113. Judge Hilton and the other corrupt (state and federal RICO) co-conspirators are now out of options.

114. They know that Relator is going to make this filing if their *farce* of judicial assignment by Chief Justice Russell does not get Relator to return to be murdered.

115. They have chosen murder. Hopefully, only attempted murder. We shall see.

116. Second chances are rare, and they don't come for free. If Realtor is killed, he knows that each and every participant in the conspiracy will receive the harshest of sentences.

117. Why? Because the person they planned to murder offered them a second change. He let go of his rage. He let go of his desire for revenge. Fair punishment is appropriate to be sure, but even the mother of Relator's children deserves a second chance. She must be treated uniquely, but she must be given that chance at some point for the sake of Relator's children.

118. When Relator's two (2) children are old enough to make their own, adult decisions, it is each of them who has their own right to forgive or not forgive their mother for the unspeakable things she has done to their father.

119. Relator believes that he raised his sons right and they will do what is right for each of them, in their hearts. That may be different for both of them, but that is their choice to make. And Relator does not suggest that Rebecca A. Copeland should be forgiven by anyone other than possibly her higher power. She sits in a unique role in

this case. Unlike Judge Hilton and the others, she is the mother of Relator's children. She agreed to be part of taking her own children's father's life and taking him away from her own children permanently. What else that woman is capable of is unknown. That said, she still deserves a fair punishment and Relator will advocate for even her to the extent he can physically pull it off.

120. Relator knows that no matter what path they choose the will never forget that their mother was involved in the attempted or successful murder of their father. That's enough. Relator controls no one. Everyone has free will. Relator is not saying that he will quickly forgive anyone if he lives, but he has already committed in writing to ensuring everyone gets a second chance.

121. An attempt at murder is not a success. And maybe a higher power intervened to be sure that one happened but not the other.

122. As will be discussed, the corruption exposed in this filing has been used to keep Relator and his children apart from the joint physical custody that Relator and his children's mother possessed by court order from the June 17, 2010, until the TRO was entered in this matter on March 13, 2024.

123. The underlying matter has been pending for more than a year and Relator only has custody of his Children one night per week. He has a solid year of proven sobriety and yet the relevant injunction and limited custody remains.

124. Simply stated, Relator uncovered the corruption, can easily prove it, and the corrupt, criminal co-conspirators are using Relator's current and future custody of his children to attempt to keep him quiet. The corrupt individuals also seem to desire even more money from Relator than they have already stolen.

125. Relator, as a member of the Missouri Bar, and as an Officer of this Court, refuses to yield to the pressures of the corrupt conspirators and he will continue to expose the truth through the proper application of Missouri law and Missouri civil procedure.

126. Indeed, Missouri law forbids not only the substantive actions taken by Presiding Judge Hilton and others, but it also forbids Judge Hilton's efforts to disregard his procedural obligation to transfer this matter to the Missouri Supreme Court where his, and others', criminal corruption will be laid bare for all to see.

127. Relator seeks the assistance of this Court to apply Missouri law and transfer this matter to the Missouri Supreme Court by its own order, or to at least enter a Writ of Prohibition and/or Mandamus compelling Judge Hilton to do the same.

FACTS

The underlying matter was filed by Respondent on March 12, 2024. Ex. 1 (Exhibits Pages 1-33) and Exhibit 2 (Exhibits Pages 34-38). On March 15, 2024, counsel Mathew G. Eilerts formally entered his appearance on behalf of Relator. Ex. 3 (Exhibits Page 39). On March 19, 2024, the case was assigned to Commissioner Mary W. Greaves following a motion for change of judge as a matter of right. Ex. 4 (Exhibits Pages 40-41). On March 18, 2024, counsel Maia Brodie and the law firm Brodie Law entered their appearance on behalf of Respondent. Ex. 5 (Exhibits Pages 42-43). Notably, the Brodie Law Entry of Appearance also included Elizabeth Carthen and Sara Lowe. *Id.* That will be particularly relevant when the Missouri Supreme Court implements the procedure to cast a wide net around all of the corrupt and unethical lawyers, judges and commissioners relating to this case. As referenced below, Relator possesses knowledge of more individuals that he has documented and will be sharing only with the Missouri Supreme Court.

This case proceeded through the entry of an initial March 13, 2024 *ex parte* TRO, an April 8, 2024, Order to Continue TRO, and series of improper and unnecessary consent orders dated April 29, 2024; August 5, 2024; and October 2, 2024, all of which were recommended by Relator's former, unethical and corrupt counsel Mathew G. Eilerts. Ex. 6 (Exhibit Page 44), Ex. 7 (Exhibit Page 45), Ex. 8 (Exhibit Pages 46-53), and Ex. 9 (Exhibit Pages 54).

The March 13, 2024, *ex parte* TRO contained that extreme and baseless injunctive relief that prohibited Relator from even texting his Children. Ex. 6 (Exhibit Page 44). That language was used to commence the corrupt path of stealing Relator's life savings, to, upon information and belief, financially reward some of the corrupt individuals, but more importantly fund the Missouri Republican party.

Notably, Commissioner Greaves (shortly after her assignment on April 1, 2024), Mat G. Eilerts and Maia Brodie were aware that Relator had checked into a rehab facility in California as of and shortly after March 17, 2024. Relator notes that Ms. Brodie entered her appearance on behalf of Respondent on March 18, 2024 just three (3) days after Respondent's initial counsel filed her Motion for Change of Judge from Associate Circuit Judge Heggie, a *Democratic* Governor Jay Nixon appointee. Ex. 1 (Exhibit Pages 1-13). On April 1, 2024, this case was assigned to Commissioner Greaves. Ex. 4 (Exhibit Pages 40-41).

Nevertheless, the April 8, 2024 Order to Continue TRO continued to prohibit Relator from texting his own children. Exhibit 1 (Exhibit Pages 1-33), Exhibit 7 (Exhibit Page 45). The Missouri Supreme Court needs to look no further than that Order and that date to find objective evidence of corruption.

On August 14, 2024, Relator filed his first Counter-Motion to Modify Child Support. Exhibit 10 (Exhibit Pages 53-57). That motion was delayed due to Mr. Eilerts' unethical recommendation resulting from his ongoing corrupt advice. Thereafter, on October 31, 2024, Relator filed his First Amended Counter-Motion to Modify Child Support, Physical Custody Schedule, and Amend Provision on

Passports. Exhibit 11 (Exhibit Pages 58-64). That First Amended Counter-Motion was allowed by order of leave of court dated November 7, 2024. Exhibit 12 (Exhibit Page 65).

Relator notes that the underlying matter was set for mediate that took place on November 19, 2024, before corrupt lawyer and routine mediator Elaine Pudlowski and the law firm of Frankel, Rubin, Klein, Payne & Pudlowski, P.C. It was during that mediation that Guardian *Ad Litem* John Fenley for the first of *several* times, stated that Commissioner Greaves “hated” Relator. Exhibit 13 (Exhibit Pages 66-69). Relator softened the terminology he used with the 21st Circuit Court at the request of corrupt Guardian *Ad Litem* John Fenley. Mr. Fenley requested that his statement of “hatred” be provided with the context that it was “his impression” of that obvious fact. Exhibit 14 (Exhibit Pages 70-73).

On November 26, 2024, counsel C. Curran Coulter, who was recommended by Mr. Eilerts, and who was retained by Relator on a limited basis, entered his appearance on behalf of Relator to handle the sole deposition of a single fact witness – Staci Thomas. Ex. 15 (Exhibit Pages 74-75). Mr. Coulter and his law firm Coulter Goldenberger PC would eventually bill Relator more than \$18,000 to prepare for and take that single and partial deposition, a deposition that lasted all of ~2.5 hours. Exhibit 16 (Exhibit Pages 76-97). Corruption on full display.

On a related note, Mr. Eilerts and his law firm of criminal named partners billed Relator more than \$60,000 for this matter in which Relator himself did 99% of all of the legal work, including *essentially all* briefs and other non-handwritten filings. *Id.* More corruption and more money to pay the corrupt participants, including Respondent Rebecca A. Copeland and, presumably, filter to Missouri’s Republican political candidates and/or party.

As detailed in Relator’s written Motion to Disqualify Commissioner Mary W. Greaves (“Motion to DQ Greaves”), he made an oral motion to disqualify the Commissioner in open court on December 2, 2024, based, in part, on Guardian *Ad Litem* John Fenley’s statement regarding “hatred” which obviously revealed the

Commissioner's bias. Ex. 17 (Exhibit Pages 99-306). As detailed in the Motion to DQ Greaves and, more importantly, in its exhibits, Relator demonstrated the *actual bias* demonstrated by Commissioner Greaves throughout the case and he specifically demanded transfer to the Missouri Supreme Court pursuant to Mo.R.Civ.P. 51.05(e) in light of the corruption within the 21st Circuit Court. *Id.* As this Court knows, the rumors of corruption within *at least* the Family Court of the 21st Circuit Court are legendary.

Much how Judge Hilton would later reveal himself to be corrupt, Commissioner Greaves revealed the full extent of her corruption by entering three Orders dated December 9, 2024, long after Relator moved to disqualify her for bias and in violation of the Missouri Supreme Court's decision in *Matter of Buford*, 577 S.W.2d 809 (Mo. banc 1979). Ex. 18 (Exhibit Pages 307-308), Ex. 19 (Exhibit Page 309) and Ex. 20 (Exhibit Page 310).

As Commissioner Greaves' Orders were entered in violation of *Matter of Buford*, 577 S.W.2d 809, on December 16, 2024, Relator filed a Motion to Vacate and Set Aside December 9, 2024. Ex. 21 (Exhibit Pages 311-358). In that filing, Relator specifically cited and discussed *Matter of Buford*, 577 S.W.2d 809 (Mo. banc 1979), and placed Commissioner Greaves on actual notice of the fact that her December 9, 2024 Orders were entered without authority and that she certainly could not enter any further orders in the matter other than transferring the matter to the Presiding Judge so that he could vacate the improperly entered Orders already entered by the Commissioner without jurisdiction.⁴ *Id.*

Commissioner Greaves' unethical behavior was so obvious and Relator's investigation revealed the likely source(s) and/or conduit(s) of her information,

⁴ *Matter of Buford* did not expressly address whether the judge or commissioner that is subject to a Motion for Change of Judge for Cause can enter an Order *favorable* to the filing party. Relator's reading of the dicta in the decision on that issue that was not raised, is that such a judge or commissioner should not enter even orders that are favorable to the moving party.

that Relator noticed Commissioner Greaves herself and third-party fact witness Suzanne Bremehr for depositions before the newly reopened discovery window closed. Ex. 22 (Exhibit Pages 359-360) and Ex. 23 (Exhibit Pages 361). Relator has a much more than good-faith belief that Ms. Bremehr has relevant and admissible information regarding Commissioner Greaves' *ex parte* judicial communications. Evidence will show that they are lifelong friends, lived minutes from one another for more than a decade, and, most importantly, fact witness Staci Thomas admitted in her deposition that she talked to Ms. Bremehr about this case. Ex. 24 (Exhibit Pages 364-366). Even if Relator is incorrect, the entire purpose of discovery is to determine if such relevant and admissible evidence does exist.

Further, on December 18, 2024, in light of the *objective evidence* of the very corruption Relator knew was taking place, he filed a Motion for Leave to File a Second Amended Counter-Motion to Modify Child Support, Physical Custody Schedule, and Amend Provision on Passports directed to Judge Hilton as Relator's counsel Mr. Coulter advised him that Judge Ott would not hear his motion before January 1, 2025. Ex. 25 (Exhibit Pages 367-369), Ex. 26 (Exhibit Pages 370-378) and Ex. 16 (Exhibit Pages 76-98). Relator now realizes that Mr. Coulter's statement was part of the corruption and intent to delay his allegations for review by Judge Hilton. Again, while a seasoned circuit court litigator, Relator was told that he had "no idea how things worked in family court" and he deferred to his corrupt counsel. Ex. 16 (Exhibit Pages 76-98). The Motion for Leave was improperly granted by Order of Commissioner Greaves dated December 19, 2024.⁵ Exhibit 27 (Exhibit Page 379).

Relator went to the effort to specifically cite and discuss *Matter of Buford*, 577 S.W.2d 809, to Commissioner Greaves and she, just like Judge Hilton would later do, ignored it and entered three (3) improper Orders. Exhibit 27 (Exhibit

⁵ See note 3 *supra*.

Page 378), Exhibit 28 (Exhibit Pages 379) and Exhibit 29 (Exhibit Pages 381).⁶

Obviously, a written motion was unnecessary to place Commissioner Greaves on notice that Petitioner was moving to disqualify her for bias. That was accomplished on December 2, 2024, and that fact is undisputed. Nonetheless, Commissioner Greaves cited the lack of an actual written filing as her apparent basis for continuing jurisdiction in her improper Order denying Relator's Motion to Reopen Discovery. Ex. 29 (Exhibit Page 381).

Her bias was placed at issue by Relator's oral motion in open court on December 2, 2024, and her ability to remain assigned to the case was thereby challenged on that date, and the corrupt Commissioner Greaves went on to ignore Missouri law and the fact that she had no jurisdiction as of that point in time and, instead, acted to deny the effort *to take her own deposition* that would expose *at least* her own corruption and *ex parte* judicial communication. Ex. 28 (Exhibit Page 379). That, that right there, is corruption on full display. That is the purpose behind the Missouri Supreme Court's ruling in *Matter of Buford*, 577 S.W.2d 809.

As noted above, despite being initially filed on December 17, 2024, and corrected and filed again on December 24, 2024, Relator's Motion to Disqualify Commissioner Greaves for Cause was not accepted on the Court's docket until January 3, 2025. Ex. 17 (Exhibit Pages 99-306). The significant delay (December 24, 2024 till January 3, 2025) was obviously intentional and was caused to ensure that Relator's motion to DQ Commissioner Greaves would be considered and ruled upon by newly assigned Presiding Judge Bruce Hilton who took over the position of Presiding Judge as of January 1, 2025, and not by outgoing Presiding Judge Ott. The courthouse was open during that entire time except for very limited hours on the date of Relator's filing, December 24, 2024, and the following day, Christmas Day on December 25, 2024. It is Relator's recollection

⁶ See note 3 *supra*.

that the courthouse was otherwise open except for potentially closing early on New Year's Eve and having limited hours on New Year's Day, January 1, 20205.

Relator's conclusion that the filing was intentionally delayed is also based upon statements made by Relator's unethical and corrupt former counsel C. Curran Coulter. Exhibit 16 (Exhibit Pages 76-98). Mr. Coulter's statements, but not Relators, are admissible under Missouri's crime-fraud exception. It was Mr. Coulter who stated that Judge Hilton needed to be the one to rule on Relator's Motion to Disqualify/Change of Judge due to actual bias. And, of course, it is now known that Judge Hilton is part of the pervasive corruption.

In light of Relator's deliberate and unrelenting demand to expose the corruption in which both of his counsel Messer's Eilerts and Coulter were participants, each moved to withdraw. Ex. 30 (Exhibit Pages 384-386) and Ex. 31 (Exhibit Pages 387-389). Mr. Coulter moved to withdraw on December 31, 2024 and Mr. Eilerts moved to withdraw on January 8, 2025. *Id.* On January 8, 2025, Relator filed a quasi-consent to Mr. Eilerts' Motion to Withdraw as he desired to fire Mr. Eilerts as his unethical lawyer but he also wanted to point out, on the record, the unethical conduct he had engaged in as he had already reported him to the Office of Chief Disciplinary Counsel. Ex. 32 (Exhibit Pages 381-389). At that point in time, Relator only realized that Mr. Eilerts refused to participate in the effort to expose Commissioner Greaves for personal reasons, he did not realize Mr. Eilerts, his friend and former law partner, was corrupt and stealing Relator's money and actively assisting the other side. Ex. 16 (Exhibit Pages 76-98). Absolutely stunning. Shocking.

The date of Mr. Eilerts' Motion to Withdraw is important, in that, it took place the day immediately after Relator's filing of his January 7, 2025, Supplement and Amendment by Interlineation to Motion to Disqualify Commissioner Greaves for Cause, and for Transfer to the Missouri Supreme Court. Ex. 33 (Exhibit Pages 390-437).

Relator's January 7, 2025, filing was a critical point in the underlying case as it was ***the filing*** in which Relator expressly proved on the record that Commissioner Greaves and Respondent's counsel Maia Brodie, Special Representative to the Office of the Chief Disciplinary Counsel of the Missouri Supreme Court, had engaged in *ex parte* judicial communications. Ex. 33 (Exhibit Pages 390-437). This is the filing that Mr. Eilerts and Mr. Coulter tried to stop. Relator knew that the Commissioner not only "hated" him, but that she was "on the take" and talking directly or indirectly to Ms. Brodie all along and was part of the very corruption that Relator now exposes. Of course she was, that was no surprise. It is the fact that corruption extended beyond the Commissioner, Ms. Brodie, Mr. Eilerts, Mr. Coulter and Mr. Fenley that was a complete shock.

As was also no surprise, when faced with irrefutable proof that she had engaged in unethical and corrupt behavior, Commissioner Greaves **recused** under false pretenses on January 13, 2025. Ex. 34 (Exhibit Page 438). Her Order of Recusal cites purported threats in a filing by Relator. *Id.* Relator ***urges*** the Missouri Supreme Court to read the brief which Commissioner Greaves referenced in her Order of Recusal. Ex. 33 (Exhibit Pages 390-437). Relator made no threats, only promises that he would see her pursued criminally and that he would sue her and the other unethical participants civilly. Ex. 33 (Exhibit Pages 390-437). Promises, not threats. There was nothing the Commissioner could do to stop Relator from his plan and any suggestion of an improper threat or intimidation is absurd.

Indeed, as is detailed in the briefing in this case, Relator had ***long before*** his January 7, 2025, filing, reported Commissioner Greaves to the Missouri Supreme Court's Office of Chief Disciplinary Counsel. Relator called the Office of Chief Disciplinary Counsel on December 31, 2024, and submitted a website Rule 4-8.3 Report on or about January 1, 2025. Exhibit 16 (Exhibit Pages 76-98). No threats, only promises made and promises that will be kept. Indeed, Relator will file civil suits against every single individual and entity that he has identified

as corrupt and that he stated he would, just as soon as he can appear before an impartial and non-corrupt judiciary.

On January 20, 2025, Relator filed his response to Mr. Eilert's Motion to Withdraw in which he stated: "Petitioner consents but he notes that such withdrawal is improper under the Missouri Rules of Professional Conduct."

Exhibit 32 (Exhibit Pages 381-389). No statement could be truer than that. At the time of the filing, Relator had no idea of the *full extent* of either Mr. Eilerts' or Mr. Coulter's corruption and unethical conduct. Both had actually and actively worked against Relator's best interests. Obviously, they must lose their law licenses as they await their jail or prison sentencing. Indeed, if the Office of Chief Disciplinary Counsel actually does its job, every corrupt individual will have their law license immediately suspended. Relator doubts that will happen as the Office of Chief Disciplinary Counsel *is part of the corruption at issue*. Ex. 16 (Exhibit Pages 76-98).

On January 14, 2025, the underlying case was improperly transferred by a Family Court Reassignment Order to Division 36 of the St. Louis Family Court within the 21st Circuit Court of the State of Missouri. Ex. 35 (Exhibit Page 439).

On January 17, 2025, realizing that most, if not all, of the 21st Circuit Court's Family Court and other divisions - at least those with judges appointed by Republican Governors - were corrupt, Relator filed his *second* Motion for Change of Judge and again requested that the underlying matter be transferred to the Missouri Supreme Court. Ex. 36 (Exhibit Pages 440-559). Because the filing was not seven (7) days prior to the January 21, 2025, hearing that was set for Mr. Eilert's Motion to Withdraw, Relator noticed his second Motion for Change of Judge for hearing on February 7, 2025. Ex. 37 (Exhibit Pages 560-561). His prior motion directed to Commissioner Greaves was moot due to her recusal so Relator cancelled that hearing that had been set for January 21, 2025. Ex. 38 (Exhibit Pages 562-563).

On January 21, 2025, due to his cancellation of the hearing on his own Motion to Disqualify Commissioner Greaves, Relator appeared to argue solely Mr. Eilerts' Motion to Withdraw. Ex. 16 (Exhibit Pages 76-98). At that hearing, Judge Hilton made quite the production in the courtroom that he took offense to everything that had happened just as Relator detailed in his *second* Motion to Disqualify, he noted the unethical behavior of, and he chastised, Mr. Eilerts, Ms. Brodie and Mr. Fenley. *Id.* With regard to Mr. Eilerts, Judge Hilton denied Relator's request to examine him and create a record of the basis for his unethical motion to withdraw. *Id.*

Further, Judge Hilton assured Relator that things would be corrected as soon as possible *if only* Relator would consent to allowing Judge Hilton to personally handle the case going forward. Ex. 16 (Exhibit Pages 76-98). Judge Hilton went so far as to promise Relator a March trial setting. *Id.*

In order to accomplish his corrupt goal, Judge Hilton unexpectedly urged Relator to argue his second Motion to Disqualify directed at the fact that his case was assigned to Division 36 and Judge Green. Ex. 16 (Exhibit Pages 76-98). That motion had been noticed for February 7, 2025, not January 21, 2025, as its January 17, 2025 filing was not at least seven (7) days before the January 21, 2025 hearing, and instead it was only four (4) days prior. Ex. 37 (Exhibit Pages 560-561).

Despite *not* being prepared to argue it that day as it was not set for another few weeks, Relator nonetheless made his argument and Judge Hilton granted the motion as to the Administrative Reassignment's Order's violation of local rule 6.6(1) only. Ex. 39 (Exhibit Page 915). Relator now realizes why that Order was so limited in its basis. Judge Hilton directed Relator to hand write the Order and he told him exactly what to put in the Order. Ex. 16 (Exhibit Pages 76-98) and Ex. 39 (Exhibit Page 915). Relator notes that he learned that he omitted the reference to local rule 6.6(1) on the Order as that addition and handwriting is that of Judge Hilton. Ex. 16 (Exhibit Pages 76-98).and Ex. 39 (Exhibit Page 915).

At the end of the hearing when Relator still demanded transfer to the Missouri Supreme Court based upon an appearance of impropriety resulting, in his opinion, from a Presiding Judge evaluating and ruling upon the actions within his own circuit, even in light of Judge Hilton's offer, Relator held firm and demanded transfer to the Missouri Supreme Court. Ex. 16 (Exhibit Pages 76-98).

But Judge Hilton refused to grant that request. Ex. 16 (Exhibit Pages 76-98). As noted above, Judge Hilton stressed to Relator over and over again that Relator should consent to his handling of the matter. *Id.* In fact, Relator left the courtroom that day without making a decision on whether to stand on his demand for a transfer to the Missouri Supreme Court or to accept Judge Hilton's offer for him to personally handle the case. *Id.* Ultimately, Relator made the wrong choice and, based upon Judge Hilton's *feigned* helpful and sympathetic behavior, including his chastising of Mr. Eilerts, Ms. Brodie and Mr. Fenley, and noting that Relator and his Children had "suffered," Relator agreed to consent and he placed a lengthy consent pleading on file. Ex. 40 (Exhibit Pages 564-591). Later, Relator would place a shorter consent pleading on file. Ex. 41 (Exhibit Pages 592-595). The consent filings were huge mistakes to be sure.

Again, Relator was *unaware* at that time of Presiding Judge Hilton's family law background and his connection to the various counsel in the case, namely, Relator's former counsel at Growe Eisen Karlen Eilerts. As Relator later noted in his February 27, 2025, and February 28, 2025, *third* Verified Motions for Change of Judge and to Disqualify Judge Hilton And The Entire 21st Circuit For Cause, Richard Eisen is a former named law partner of Judge Hilton – the law firm of Eisen, Gillespie, Brown and Hilton, LLC. Ex. 42 (Exhibit Pages 596-613) and Ex. 43 (Exhibit Pages 614-639). Mr. Lawrence Gillespie, also Judge Hilton's former law partner, had long ago appeared at the first scheduled date for the deposition of Relator's adverse witness and sister Sarah M. Grant. Ex. 16 (Exhibit Pages 76-98).

On January 24, 2025, the very next day, *at least* Respondent Rebecca A. Copeland, Guardian *Ad Litem* John Fenley and Judge Hilton coordinated a plan *to frame Relator for attempted kidnapping*.⁷ Ex. 44 (Exhibit Pages 640-710). The details of that *diabolical* and unsuccessful plan are contained in the *Ex Parte* Motion for Temporary Restraining Order that Relator presented to Judge Hilton on January 28, 2025. Ex. 44 (Exhibit Pages 640-710). Relator had coordinated with Judge Hilton's assistant on exactly when he would appear to the present the *ex parte* motion. Ex. 45 (Exhibit Pages 711-712).

It was immediately after Relator's presentation of that *Ex Parte* Motion for TRO that Judge Hilton himself intentionally alerted Relator to his family law background as an express signal to let Relator know that he, Judge Hilton, was involved in the corruption and would now be in charge, in his own mind, of how the underlying matter would proceed. Ex. 16 (Exhibit Pages 76-98). With basic internet research, Relator learned what he should have investigated in December or before the January 21, 2025, hearing. Ex. 16. *Id.* To much chagrin, Relator trusted his former counsel C. Curran Coulter the most as he was a fellow Eagle Scout.

It was at that moment that Relator learned that Judge Hilton was corrupt, but Relator held out some hope that Judge Hilton would still fix what was done so that Relator, a lawyer, might be open to limiting, as a victim, the criminal sentences of the individuals involved, and accept a reasonable settlement of Relator's civil claims.

On January 30, 2025, after the corruption was obvious, Relator filed his Motion To Vacate And Set Aside October 2, 2024, Interim Consent Order And December 20, 2017, Modification Judgment, In Part, And For An Order Requiring Respondent To Pay Unjustly Received Child Support Monies, that kept him from

⁷ Let us not forget that it is not just attempted murder, there was also the attempt to frame Relator for attempted kidnapping. The actions taken are unfathomable. Relator has no more words.

his children in order to obtain a just ruling in his favor addressing, *inter alia*, the travesty that took place regarding his custody of his Children and the his huge overpayment of child support. Ex. 46 (Exhibit Pages 713-745). That Motion was supplemented on February 6, 2025. Ex. 47 (Exhibit Pages 746-769).

On January 31, 2025, after he knew that he would be moving to take a change from Judge Hilton and the entire 21st Circuit, Relator filed a Motion For Leave To File Third Amended Counter Motion To Modify Child Support, Legal Custody, Physical Custody Schedule, Amend Provision On Passports, Allocate Vehicle Expenses, And Allocate College Expenses and the actual Motion itself. Ex. 48 (Exhibit Pages 770-772) and Ex. 49 (Exhibit Pages 773-780).

On January 31, 2025, Relator also sought via motion and motions to compel, a mental evaluation of Respondent and the deposition of fact witnesses Sarah M. Grant and Staci Thomas. Ex. 50 (Exhibit Pages 781-784) and Ex. 51 (Exhibit Pages 916-917) and Ex. 52 (Exhibit Pages 785-806 and 807-828[sic]).

At the February 7, 2025, hearing on Relator's pending motions, he appeared expecting that Judge Hilton would do the right thing. What a fool Relator was. When Relator appeared for the routine granting of his consent motion to vacate and set aside the operative injunction order, Judge Hilton did what was a possibility all along. Judge Hilton required Relator to take the stand and present evidence on this Motion to Vacate and Set Aside the October 2, 2024, Interim Consent Order. Ex. 16 (Exhibit Pages 76-98). Relator's motion was verified so explained to Judge Hilton that no testimony or additional evidence was required. As soon as Judge Hilton told Relator to take the stand, he knew that Judge Hilton – the corrupt Presiding Judge of the 21st Circuit – had no intention to cease the tragedy that was ongoing and that was victimizing Relator's children and himself. Shockingly, Judge Hilton implied that Relator should have called his own children to the stand and presented expert witnesses. The Judge's statements and actions were a sham. Judge Hilton had decided to keep the corruption hidden from public view because he was its 21st Circuit ringleader.

As soon as cross-examination began, Relator realized even more what he suspected when he walked to the stand, the entire point was to allow some sort of cross-examination testimony. Ex. 16 (Exhibit Pages 76-98). When Relator testified that day, he knew the court reporter was corrupt, the judge was corrupt, the bailiff was corrupt, and the Judge's assistant was corrupt. He also knew that Respondent and her counsel were corrupt and that the Guardian *Ad Litem* were corrupt. There wasn't a single person in Division 13 that day other than Relator that would even speak the truth about what happened on the stand.

As Relator will later explain, it is in that context that any transcript of his testimony must be read, if any transcript is even accurate at all. Petitioner confirmed what he suspected on February 7, 2025, that the court reporter was willing to edit the prior transcript of Judge Hilton's hearing that took place on January 21, 2025. Ex. 16 (Exhibit Pages 76-98). At that moment on February 7, 2025, Relator knew that he might need more objective evidence to prove to the Missouri Supreme Court that he was telling the truth, and that such an outlandish criminal RICO scheme of corruption was true. As discussed below, Relator was able to obtain the precise sort of objective evidence he wanted.

But Judge Hilton was not done with Relator for his gall to push back on the corruption, Judge Hilton set this matter, filed on March 12, 2024, for trial on June 23-24, 2025. Ex. 53 (Exhibit Page 829). More than fifteen (15) months Judge Hilton ruled that Relator should be kept away from his Children. That was clear and obvious punishment for not surrendering and agreeing to Maia Brodie and her clients' demands. As discussed below, Judge Hilton expressly intends to continue that trial setting until Relator relents. That will never happen.

As noted in Relator's *third* Motion for Change of Judge that is presently at issue before this Court, Presiding Judge Hilton's former family law partner Richard Eisen is a co-named partner in the law firm that defrauded Relator, and counsel of record Larry Gillespie for fact witness Sarah M. Grant (Relator's own

sister), Lawrence Gillespie, is also a former family law partner of Presiding Judge Hilton. Ex. 42 (Exhibits Pages 596-613) and Ex. 43 (Exhibit Pages 614-639).

In his *third* Motion for Change of Judge, this time directed at Presiding Judge Hilton, Petitioner cited Presiding Judge Hilton, once again, to the fact that Missouri Supreme Court's mandatory precedent in *Matter of Buford* and his filing served to *strip* Judge Hilton of jurisdiction and compelled the Presiding Judge to cease taking any further action in the underlying matter other than to enter an administrative order transferring the matter to the Missouri Supreme Court for its consideration of Relator's motion. Ex. 42 (Exhibits Pages 596-613) and Ex. 43 (Exhibit Pages 614-639). That Verified Motion was submitted and accepted for filing on February 27, 2025, at 9:26 p.m. Ex. 42 (Exhibits Pages 596-613). As Realtor moved to disqualify the entire 21st Circuit, there is no situation in which Judge Hilton could have reasonably believed that he could issue any orders. Any dicta in *Matter of Buford* about Relator presenting his motion for argument is inapplicable, as that surely could not have been accomplished the very next morning as the only way for Relator to present this issue to the proper court, was to file this Petition for Temporary and Permanent Writs. For reasons Relator will explain to the Missouri Supreme Court, Judge Hilton and the co-conspirators have made it almost impossible for Relator to draft and file this matter and all related filings. Once the details are heard, no reasonable judge will find that Realtor did not file this timely.

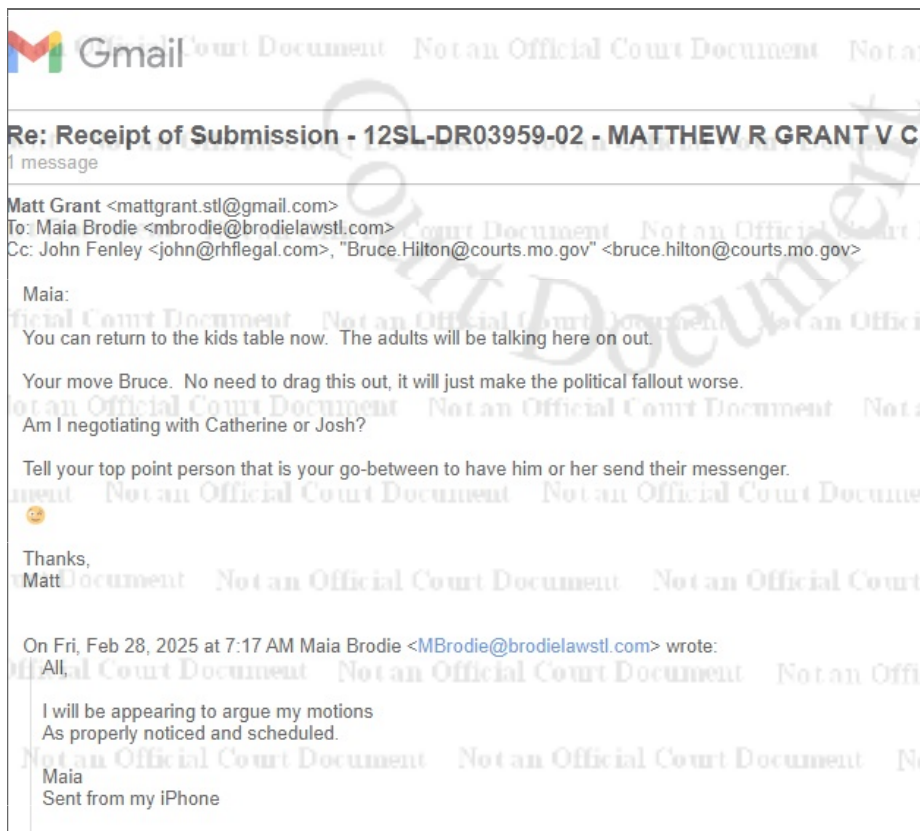
With regard to the February 27, 2025 Motion for Change of Judge, Relator went so far as to send an email at 9:45 p.m. on February 27, 2025, advising Judge Hilton and Judge Hilton's clerk, Veronica Gipson, Respondent's counsel Maia Brodie and the Guardian *Ad Litem*, John Fenley, of the filing and confirming that the hearing the next morning on February 28, 2025, could not go forward as the 21st Circuit Court no longer had jurisdiction to take any substantive action. Ex. 54 (Exhibit Pages 830-833). Relator also forwarded that email to Judge Hilton's former law partner, Lawrence Gillespie, as he represents Relator's sister and fact

witness Sarah M. Grant in the underlying matter as noted above. Ex. 55 (Exhibit Pages 834-836).

Of course, Relator was correct in his brief and in his emails about the status of Judge Hilton's jurisdiction. There is no chance that Realtor would even have grounds to file a Petition for Writ until and unless Judge Hilton denied transfer or took an improper action.

The next morning, February 28, 2025, at 9:14 a.m., Relator filed an updated version of the same Verified Motion to correct certain grammatical and other errors. Ex. 43 (Exhibit Pages 614-639).

Within minutes, on February 28, 2025, at 9:34 a.m., Relator sent an email to Judge Hilton, Respondent's counsel Maia Brodie and the Guardian *Ad Litem*, John Fenley, that read:



Ex. 54 (Exhibit Pages 830-833).

The tone and content of the email in response to corrupt Mia Brodie was intentional. While Relator knew that Presiding Judge Hilton was corrupt, the

evidence that would be before the Missouri Supreme Court could benefit from more *objective evidence* of corruption. Relator knew that his credibility may not be enough to demonstrate quite as conclusively as it should that Judge Hilton was, indeed, part of such an elaborate scheme of criminal corruption. Many have heard the rumors and seen the journalism coverage, and internet ravings, all true, but what Relator wanted was evidence that the Missouri Supreme Court could not ignore, so he sent the email above to see how Judge Hilton would react. The trap had been set.

Contrary to the Missouri Supreme Court's mandate in *Matter of Buford*, 577 S.W.2d 809, that Judge Hilton was well-aware of as Relator personally cited it to him during the hearing on January 21, 2025, and it was included in various briefs, including the very Motion to Disqualify him. However, Judge Hilton acted precisely as predicted, he ignored his lack of any substantive jurisdiction in the case and stepped right into the trap.

Judge Hilton reacted and punished Relator *yet again* for having the gall to, this time, go so far as attempt to expose criminal corruption within the 21st Circuit Court by entering an Order and Judgment denying Relator's *meritorious* Motion to Vacate and Set Aside the October 2, 2025, Consent Order. Ex. 56 (Exhibit Pages 837). Recall, the *Consent* Order at issue had only been executed because he was strictly advised to do so by his former, now known to be unethical and corrupt former counsel – Mat G. Eilerts of the law firm of Growe Eisen Karlen Eilerts. Ex. 46 (Exhibit Pages 713-745) and Ex. 47 (Exhibit Pages 746-769).

As will be discussed in future briefing, Presiding Judge Hilton acted as was hoped and he sprung Relator's trap. Specifically, he provided Relator the *additional objective* evidence that Relator desired to provide to the Missouri Supreme Court. More evidence above and beyond the tortured treatment of himself and his children, and the evidence of Commissioner Greaves' *ex parte* judicial communication, so that that Missouri Supreme Court could see that Relator's credibility need not even be considered. The objective evidence shows

that Judge Hilton is corrupt. Relator knows that this scenario difficult to believe but he swears subject to the penalty of perjury that it is.

Only a corrupt Circuit Judge would, like a corrupt Commissioner, so willingly violate the most basic mandate and well-settled commonsense rule of law detailed in *Matter of Buford*, 577 S.W.2d 809 - once the subject of a Motion for Change of Judge Due to An Appearance of Impropriety or Bias, absolutely no circuit court trial judge or commissioner can take any action, much less the extreme action so adverse to the moving party as is the Order and Judgment. The judge subject to the Motion must await a ruling by a neutral judge or judges – here the Missouri Supreme Court – and see if he or she will retain the case.

Judge Hilton's additional rulings on his former law partner Larry Gillespie's Motion to Dismiss With Prejudice a Notice of Deposition, which any capable lawyer knows isn't even a motion that can be procedurally filed and considered, and his ruling in favor of corrupt Office of Chief Disciplinary Counsel, Special Representative Mia Brodie, and her corrupt client Rebecca A. Copeland, was literally the cherries on the top. Judge Hilton didn't just enter one (1) Order adverse to Relator, he entered three (3). Hoisted With His Own Petard Judge Hilton is. And thankful Relator is.

Judge Hilton was so blinded by his self-believed power and self-fantasized skillset that he failed to see the very trap that Relator had set. Less worthy adversaries Relator has *never* encountered during his 24 years as a Missouri licensed attorney and litigator.

Judge Hilton's retaliatory ruling had the harsh and intended effect of not allowing Relator to have his normal, 50/50 joint physical custody of his children until at least the current trial setting of June 23-24, 2025. There is no doubt that Judge Hilton plans to continue the current trial setting that was already a punishment in and of itself, and if and when a trial ever takes place, he will delay in making a ruling, all in the hope that Relator will submit, yield, and agree to keep the corruption at issue a secret.

How does Relator know? Judge Hilton made it clear in off-the-record comments that he could drag the underlying case out until Relator's youngest child, CMG, now age 13, was 18 years old. Ex. 16 (Exhibit Pages 76-98). Years of successful corruption without challenge appears to make a sitting judge cocky and convinced he is invincible. Relator takes the corrupt criminal Judge Hilton at his word, and he believes that is surely his intent and plan. There is absolutely no doubt.

In addition to the improper denial of Relator's Motion to Vacate the Consent Order that was entered without jurisdiction, Judge Hilton proceeded in the underlying matter and entered a total of three (3) Orders in two separate docket entries, that were each prejudicial to Relator. Ex. 56 (Exhibit Page 837) and Ex. 57 (Exhibit Page 838). Relator notes that he has supplemented the record in the Circuit Court (still improperly administratively assigned this matter) in order to make the *ex parte* Motion for TRO referenced in his Motion for Change of Judge relating to Judge Hilton part of the trial court record and he attaches the above-referenced Affidavit to further supplement the record in this matter. Ex. 58 (Exhibit Pages 839-912) and Ex. 16 (Exhibit Pages 76-98). Not surprisingly, despite the supplementation being submitted at 1:00 p.m., it has not been accepted by the Judge Hilton or anyone in his Division. Ex. 59 (Exhibit Pages 913-914). The same old trick pulled by Commissioner Greaves and/or her staff when Relator filed his Motion to Disqualify her and it sat as "submitted" from December 24, 2024, to January 3, 2025. Ex. 16 (Exhibit Pages 76-98). To be sure, Judge Hilton is in no hurry to accept the TRO pleading that he already refused to accept once before. It is **damning** evidence of corruption in this case.

Relator can now state what he knew at the time of his filing of the Motion for Change of Judge and to Disqualify Judge Hilton that was drafted to be lay in the weeds and focus on his appearance of impropriety. Recall Relator's trap to catch a corrupt Presiding Judge, Bruce Hilton does not just appear to be an improper judge for the underlying case, **he is the 21st Circuit Court's ringleader**

and protector of corruption in which he is involved, and he is actually biased.

Relator hereby expresses his thanks to Judge Hilton for his sophomoric move and assistance with the additional objective evidence in this regard.

Importantly, Judge Hilton and his corrupt co-conspirators' plan going back to at least January 2025, has been to engage in ruthless and relentless intimidation of Relator. Relator declines to specify the extreme measures that he has encountered and suffered as they were specifically inflicted in the hopes that Relator would list them all, and risk looking delusional if he ever relied upon them as evidence.

When the time is right, Relator is prepared to tell and show the Missouri Supreme Court what this *despicable* group of corrupt Republican politicians, judges, commissioners and lawyers have done to make Relator's life a living hell.⁸ That story will be told another day, when the Missouri Supreme Court has this case.

Finally, Relator notes that the sealing of courtrooms, certainly 21st Circuit Family Court courtrooms, and prohibition of *any* recordings is nothing more than an avenue for corruption to be hidden from public view. The enemy of corruption is transparency. Relator urges the Missouri Supreme Court to order that all counsel and *pro se* parties be allowed to openly record all court proceedings in at least the 21st Judicial Circuit.

Further, Relator urges the public to outcry for a change to the Missouri Non-Partisan Court Plan for the selection and appointment of judges. It has been *the tool* misused by these corrupt and criminal co-conspirators to pull off what is an amazingly complex and shockingly vertically reaching conspiracy of corruption, silence and containment.

⁸ The irony is that Relator is well-known to be a Republican himself and he openly voted for President Trump, twice.

**THE PLANNED MURDER OF RELATOR DUE TO THIS AND HIS
PRIOR FILINGS EXPOSING JUDICIAL CORRUPTION IN THE S21ST
CIRCUIT COURT**

Relator filed his *Verified* Petition in the Eastern District Court of Appeals on March 26, 2025. Ex. 60 (Exhibit Pages 915-919) and Ex. 61 (Exhibit Pages 920-947). At the same time and as already noted above, Relator filed a solid Motion to Disqualify the entire Eastern District Court of Appeals. Ex. 62 (Exhibit Pages 948-957). The Motion was meritorious and should have resulted in the immediate transfer of this matter to the Missouri Supreme Court. The statements by Judge Hilton (relying on Relator's credibility), but more importantly, his actions in flat out ignoring his obligation to transfer this matter even though he knew Relator would seek a Writ, proves that a reasonable person would find that there is no way that Judge Hess should have entered the Order of Denial that he did. Ex. 63 (Exhibit Pages 958-959). While it was couched as doing Relator some favor, Relator believes that it was actually intended to cause a delay to allow for Judge Hilton to take whatever action he deemed appropriate – to murder Relator. *Id.*

The fact that Judge Hilton almost instantaneously entered a fake March 4, 2025, Order purportedly signed by Chief Justice Mary Russell of this Court. Ex. 66 (Exhibit Page 997). Judge Hilton's entry of the purported Chief Justice Russell Order took place at 9:37 a.m. on the morning of the day Judge Hess' Order of Denial was entered. Ex. 63 (Exhibit Pages 958-959), Ex. 64 (Exhibit Pages 960-962) and Ex. 65 (Exhibit Pages 963-996). That timing is certainly concerning.

The naïve corrupt conspirators, including Judge Hilton, OCDC Special Representative Maia Brodie, and Guardian *Ad Litem* John Fenley, thought their final Hail Mary might work. Or they knew they were out of options. They obviously decided not to be human beings and accept a fair punishment for what they had done and what was about to be exposed.

No, they did not do that!

Instead, Judge Hilton entered a *false* Order purportedly from Chief Justice Mary Russell that was intended to lead Relator to believe he had won. Ex. 64 (Exhibit Pages 960-962), Ex. 65 (Exhibit Pages 963-996), and Ex. 66 (Exhibit Page 997). They then somehow thought that Relator would not notice that the false Order was dated March 4, 2025, suggesting that it had been held in abeyance for more than three (3) weeks. Ex. 66 (Exhibit Page 997).

Most importantly, they actually thought that Relator, who has displayed some rather decent legal skills in this case, would believe that a newly appointed judge would allow the judge that had been replaced by the Missouri Supreme Court, supposedly issued en banc, to enter a Docket Text Order setting the new judge's first hearing – a preliminary injunction hearing. Ex. 64 (Exhibit Pages 960-962) and Ex. 65 (Exhibit Pages 963-996).

Those facts and the fact that there is no procedural way that this Court could practically have seen Relator's filings in light of Judge Hess of the Eastern District Court of Appeal's ***March 26, 2025 denial Order***, make it was impossible to believe that the Chief Justice of this Court, *sua sponte*, looked for this case ***on or prior to March 4, 2025***, several weeks prior to when Relator's made his first filing with the Eastern District Court of Appeals. Further, Judge Hilton would have Relator believe that Chief Justice Mary Russell found Relator's circuit court filings, reviewed them, gathered the full court for an en banc Order appointing a new, retired judge, all with no further instruction or comment whatsoever. Give me a break!

First, we have proof that someone at the Eastern District Court of Appeals may have tipped off Judge Hilton as to what was coming, and when, so that he could have a false Order ready to go at 9:12 a.m. the day of the EDMO Order's entry.

What happened next is unbelievable in how evil it is. Judge Hilton created a docket entry in which he claims to be setting a Preliminary Injunction hearing for April 4, 2025, as some sort of courtesy for the judge that replaced him but

noting that new judge would be handling the hearing. I mean, come on now. That is absurd.

Sure, Relator of all people would believe that after the March 4, 2025, Order was finally revealed granting his Motion for Change of Judge, that thereafter the new Judge, T. Lynn Brown, requested and allowed the prior judge that he was appointed to replace, to enter any orders, much less a Preliminary Injunction Order hearing setting on his behalf is so unbelievable that Relator is insulted that any of these criminals would think that he would believe it. But again, they were out of options.

And here is the crescendo of why all of this happened, there is *only one reason* a criminal jury will find that the false Chief Justice Russell Order and the false April 4, 2025, hearing setting were entered by Judge Hilton and forwarded to Relator by John Fenley. Just one reason. Surely, this Court sees it before Relator types it. Why would Judge Hilton, who knew that Relator would stop at nothing to expose corruption, create a fake hearing in St. Louis, Missouri when he knew that Relator was outside the United States?

It *served the sole purpose* of luring Relator back from abroad and to the St. Louis area. That sole purpose provided just one thing. There was never a plan for the fake hearing to take place. Not at all.

What they did was attempt to lure Relator home from abroad so they had one last chance for someone involved with the co-conspirators, or more likely someone hired by them, to murder Relator before he could make this filing. It is shocking! But it is obvious. And it is true!

Relator comes down on the conclusion that the most likely scenario is that all of the co-conspirators, who are criminally liable for the acts of all of the other co-conspirators, determined that they had no other options left but to murder Relator. But they did have other options!

They could have been stood tall like real men and real women and accepted what was coming. They could each have admitted to being a *corrupt* judge, a

corrupt lawyer, a corrupt politician, a corrupt court employee, an evil mother, or an evil relative of Relator. Or they could have immediately hired a criminal defense attorney and planned a vigorous criminal defense.

But they didn't. Instead, they chose murder. It is hard to type but this is *exactly why* Relator left the United States the very morning he completed his filings with the Court of Appeals for the EDMO.

Relator knew what these people were capable of. That's why Relator drove very far away from St. Louis and made sure he did not fly out of St. Louis' Lambert Airport. Relator stayed overnight far away and flew out of another airport in another state to his destination in a foreign country. A destination where he currently hides in the hopes that he avoids assassination.

Relator knew exactly who he was exposing, what they would immediately want to do, that they would actually do it, and how quickly they could make it happen. As Relator has stated before, he has outmaneuvered all of the co-conspirators at every turn. He is smarter than all of them combined. Relator knew their next actions before they did.

So when the *fake* Order from Chief Justice Russell replacing Judge Hilton came in, he did what was smart. He played along. To call them out would merely move the date of his death forward and move the location of his murder to outside of the United States. So Relator played along via emails. Ex. 68 (Exhibit Page 1000. Not just one email but two. *Id.* It bought him more time. It gave him until April 4, 2025, to get these filings done and submitted to the Missouri Supreme Court. What a blessing it was.

And as the cherry on top, wouldn't you know it, even the Respondent in the underlying matter, Rebecca A. Copeland, was stupid enough to prove that she was involved in the planned murder by sending Relator an Our Family Wizard message on March 27, 2025, at 9:28 p.m. stating that she was concerned about the "the legacy you leave behind." Ex. 69 (Exhibit Page 1001). Ms. Copeland

confirmed what Relator had already known was coming, that he would be murdered. Now that is one hell of an idiot.

Because Ms. Copeland lacks any critical thinking skills whatsoever, Relator even responded and noted that she sent a “death threat.” Ex. 69 (Exhibit Page 1001). Relator knew that Ms. Copeland was not bright enough to pass along his response to her co-conspirators so that they would know that Relator was now aware that he was going to be killed. She is an idiot indeed.

AUTHORITY

This Court has jurisdiction to determine whether a writ of prohibition, or in the alternative a writ of mandamus, shall issue. Mo. Const. Art. V, § 4; State ex rel. Director of Revenue, State of Mo. v. Scott, 919 S.W.2d 246 (1996).

As the Missouri Supreme Court, sitting en banc, explained:

Prohibition, by its nature, is a preventative [sic] rather than a corrective remedy. Hence, prohibition generally lies to prevent commission of a future act, not to undo an act already performed.” 24 Daniel P. Card II & Alan E. Freed, Missouri Practice *Appellate Practice* section 12.4 (2d ed.2001). Given this purpose, an appellate court should employ prohibition when a circuit court has erroneously denied transfer or has erroneously granted transfer but transfer is not complete.

State ex. rel. Missouri Public Service Commission v. Joyce, 258 S.W.3d 58 (Mo. banc 2008) (emphasis added).

Here, Judge Hilton has improperly refused to transfer the underlying matter to the Missouri Supreme Court and his entry of the three (3) improper orders after Relator’s Motion for Change of Judge are clear *de facto* denials in the underlying matter of Relator’s Motion for Change of Judge for Cause and Relator’s request that Judge Hilton transfer the underlying matter to the Missouri Supreme Court for its consideration of Relator’s pending Second *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, Lawyer, Guardian *Ad Litem* and Courthouse Personnel Corruption, and for Transfer to the

Missouri Supreme Court for the Appointment of a New Trial Judge Without a Potential Conflict of Interests[sic]. Ex. 41 (Exhibit Pages 592-595).

The exclusive and proper venue for the underlying matter is the Missouri Supreme Court. That conclusion is beyond dispute. Missouri law is clear. *Matter of Buford*, 577 S.W.2d 809 (Mo. banc 1979).

Further, because Judge Hilton has already entered several orders following the date and time at which he lost jurisdiction in the underlying matter, and particularly since those orders are prejudicial to Relator and require him to take action by March 28, 2025, this Court should enter an immediate and preliminary writ staying the enforceability of those orders and/or a Preliminary Writ compelling Judge Hilton to immediately vacate them and set them aside pursuant to Rule 74.06 no later than March 27, 2025.

Also, Relator followed the proper procedure and went to the Missouri Court of Appeals for the Eastern District first. Ex. 60 (Exhibit Pages 915-919) and Ex. 61 (Exhibit Pages 920-947). That should have done the job. Relator's Motion to Disqualify should have transferred at least that Motion to this Court for a ruling. Because of the breadth of Relator's Petition and the abundance of exhibits, this Court also be compelled to read Relator's Motion itself. That would have exposed the corruption. But again, Judge Hess failed for some reason.

However, as the Order of denial accurately notes, Relator is now in a procedural position to finally file something directly with the Missouri Supreme Court. This Court. The one that will put a stop to this.

Finally, Relator notes that after reading Relator's filings and the exhibits the justice and judges deem appropriate, Relator hopes that this Court will simply enter the order of transfer itself. If nothing else, however, Missouri law is clear that Relator's Motion for Change of Judge that is actually for both an appearance of impropriety and proven cause, *see* Ex. 61 (Exhibit Pages 920-947) and Exhibit 62 (Exhibit Pages 948-957), this Court has the power to enter a Writ Order of

Prohibition forcing Judge Hilton to do so backed by the power of a finding of contempt and possible immediate incarceration, etc.

In light of the urgency and importance of the issues of corruption alleged and the planned murder, Relator would surely hope that this Court acts fast.

RELIEF SOUGHT

Relator prays this honorable Court for a Preliminary and Permanent Writ Order compelling Judge Hess and/or Judge Hilton to follow the Missouri Supreme Court's mandatory precedent in *Matter of Buford*, 577 S.W.2d 809, and enter an Order transferring the underlying matter, and the operable Motions for Change of Judge applicable to each, to this court so that this Court can rule whether or not a Judge capable of murder or if an appellate court judge capable of providing a window for that murder, should rule on anything relating to Relator. It is that simple.

Additionally, Relator prays that this honorable Court for a Preliminary and Permanent Writ Order compelling Judge Hess and/or Judge Hilton to vacate and set aside the orders he entered on February 8, 2025, a time at which he lacked any substantive jurisdiction over this matter, and also rule that Relator is not obligated to comply with any of the jurisdictionally lacking Orders, including the TRO or any other Orders signed by Judge Hilton after February 7, 2025. The underlying case is currently within the sole jurisdiction of this court as it has been since February 27, 2025, when Relator filed his first Motion for Change of Judge and for Transfer to this Court.

This Court has the power to transfer the underlying matter to itself using its own inherent powers, or, at a minimum, it should enter one or more **Preliminary Writ Orders** that are immediate and cover any time while any actions ordered by this Court are awaiting completion by either Judge Hess or Judge Hilton.

WHY A PRELIMINARY WRIT(S) SHOULD BE ISSUED

This Court should issue a **preliminary writ** of prohibition and/or mandamus, if it does not transfer it to itself, as Presiding Judge Hilton's February

28, 2025, Orders include an Order that compelled Relator to comply by March 28, 2025. Relator is in a no-win situation because the order is obviously invalid but the Eastern District Court of Appeals deprived him of the preliminary writ to which he was clearly entitled as a matter of law that would have obviated his need to be concerned with any compliance. Despite Judge's Hess and Clayton's claims the contrary, their Order of Denial did little to assist Relator and their reliance on the "time constraints alleged" and their claim that Relator "... may now file his writ petition in the Missouri Supreme Court" is *a slap in the face*.

Judge Hess and Clayton's Order was entered on March 27, 2025, was not even emailed to Relator, he had to locate it on his own, and the "time constraint" was twenty-four hours away. What a load of ####!.⁹ Relator respectfully, or not respectfully, notes that Judges Hess and Clayton hung him out to dry and they damn well better be held accountable for it. All they did was play their part in the plan to assassinate Relator before this could be filed as the plan was for Relator to never know that the Order was entered and he was return on April 3rd or 4th, 2025 for a hearing that was never to take place so that he could meet his demise. Corruption. Spreads like cancer. Judge Hess and Clayton's Order is a weak attempt at plausible deniability. They denied a transfer that was required by Missouri law, and they knew it at the time. Now if these appellate judges reported to the Missouri Supreme Court what was happening, then Relator apologizes to some extent but still asks for an explanation. Relator highly doubts that these learned judges took any steps to expose the corruption that took place at least, ***under their watch***. Relator hopes that is not forgotten.

⁹ An individual that Relator respects greatly warned him that he must use only extremely respectful language and tones in his briefing. Relator tried. He has been treated to poorly and his chances at a long life are so slim that he trusts that this Court will understand the tone and language used in these filings are the absolute best Relator can do. His time on this Earth is short and professional courtesies before this learned court must suffer. These may be Relator's final words.

Because Judge Hilton has also entered an improper Temporary Restraining Order, Relator requests that this Court issue preliminary and permanent Writ Orders that set aside that Order as well, and Relator requests such further relief as this Court deems just and proper.

Matthew Grant
04/01/2025 Matthew Grant

Respectfully submitted,

/s/Mathew R. Grant

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Pro Se Relator

REMOTE NOTARY

M&A
State of Missouri Virginia)
County (and/or City) of Prince William County

On this 1st day of April, 2025, before me, the undersigned notary, personally appeared by remote online means Matthew R. Grant, proved to me through identification documents, which was his Missouri Driver's License, to be the person who signed the preceding or attached document in my presence and who swore or affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.

Mark Christopher Hewitt 8049360
(official signature and seal of notary)
My Commission Expires 02/28/2027



Notarized remotely online using communication technology via Proof.