

**MISSOURI COURT OF APPEALS
EASTERN DISTRICT OF MISSOURI**

STATE ex. rel.)	
MATTHEW R. GRANT,)	
)	
<i>Relator,</i>)	Case No.
)	
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,)	
)	
<i>Respondent.</i>)	

**VERIFIED PETITION FOR PRELIMINARY AND PERMANENT
WRITS OF PROHIBITION, OR IN THE ALTERNATIVE,
PRELIMINARY AND PERMANENT WRITS OF MANDAMUS,
BOTH RELATING TO JUDICIAL CORRUPTION WITHIN 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 to issue a Preliminary and Permanent Writ of Prohibition, prohibiting the Honorable 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). In the alternative, Relator requests that this Court issue a Preliminary and Permanent Writ of Mandamus ordering the Honorable Bruce Hilton to transfer the underlying matter to the Missouri Supreme Court pursuant to Mo.R.Civ.P. 51.05(e).

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.

In the alternative, Relator requests that this Court issue a Preliminary and Permanent Writ of Mandamus and/or Prohibition ordering Honorable 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 any others, up to the date of this Court's, and/or the Missouri Supreme Court's preliminary and/or permanent and/or final ruling.

In support of his Petition, Relator states:

1. The underlying child support and child custody matter involves *blatant judicial corruption* and ongoing efforts within the 21st Circuit to prohibit Relator from exposing the long-rumored truth – that the 21st Circuit is plagued by corruption throughout its ranks.
2. The corruption is not limited to just one judge. 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.
3. Within the Courthouse, the corruption in the underlying case involves unethical and improper conduct by *at least* the following:
 - i. Honorable Commissioner Mary W. Greaves;
 - ii. Honorable 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.
- 4. Many other individuals are known to be involved.
- 5. Further, the corruption goes far beyond the descriptions above as Relator will describe in future filings.
- 6. The underlying matter should have been a simple child custody and child support matter. It was and is not.
- 7. 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.
- 8. 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.
- 9. 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.
- 10. 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.
- 11. Upon information and belief, the corruption that Relator now exposes relates to *many* Republican Governor judicial appointees.

12. 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.
13. Relator notes that he is a former equity partner of Husch Blackwell LLP.
14. Relator practiced at Husch Blackwell LLP for ~21 years. Husch Blackwell was formerly led by former Chair and well-known Republican Catherine Hanaway.
15. Relator has intimate knowledge of Republican politics in this State.
16. Relator possesses civil substantial and valuable claims against Husch Blackwell LLP regarding its and its partner's conduct after his July 31, 2023, resignation as an equity partner in that law firm. That very well may be the motive behind much of the ongoing actions in this case.
17. This Petition does not include much of what Petitioner knows about those involved in the corruption at issue in this case.
18. Relator has documented and distributed objective evidence to several third-parties that, together, are pieces of an easy puzzle for the Missouri Supreme Court to solve on its own.
19. If this Court does not issue a preliminary and permanent writ order of prohibition and/or mandamus, the 21st Circuit will continue along its path of widespread Republican judiciary corruption and Presiding Judge Hilton will continue to punish Relator for his efforts to expose the truth and obtain his normal custody of his Children.
20. 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.

21. 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.
22. 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.
23. 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.
24. 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.
25. 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