

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 21<sup>st</sup> 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 21<sup>st</sup> Circuit Court. *Id.* As this Court knows, the rumors of corruption within *at least* the Family Court of the 21<sup>st</sup> 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, 2014. 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.<sup>1</sup> *Id.*

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

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<sup>1</sup> *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 is that such a judge or commissioner should not. Where that is a prohibition is unclear.



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.<sup>2</sup> 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 Page 378), Exhibit 28 (Exhibit Pages 379) and Exhibit 29 (Exhibit Pages 381).<sup>3</sup> 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

<sup>2</sup> See note 1 *infra*.

<sup>3</sup> See note 1 *infra*.

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 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, 2025.

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.