

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. 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 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