

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.

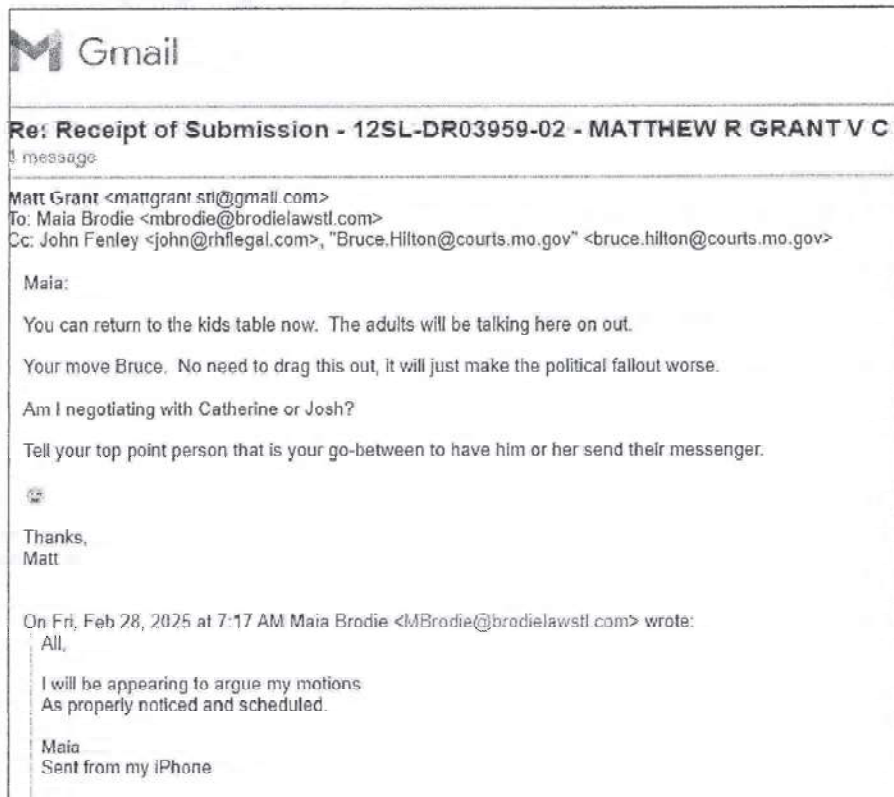
With regard to the February 27, 2025 Motion for Change of Judge, Relator went so far as to send an email at 9:45 p.m. on February 27, 2025, advising Judge Hilton and Judge Hilton's clerk, Veronica Gipson, Respondent's counsel Maia Brodie and the Guardian *Ad Litem*, John Fenley, of the filing and confirming 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.⁴ 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

⁴ The irony is that Relator is well-known to be a Republican himself and he openly voted for President Trump, twice.

an amazingly complex and shockingly vertically reaching conspiracy of corruption, silence and containment.

Relator looks forward to sharing all the names of the corrupt individuals above the Missouri state level that have been involved in this corruption. As noted in his prior and upcoming Affidavit(s), Relator has real concern and has taken a litany of steps of ensure this case reaches the Missouri Supreme Court as the corruption leads much further up and up.

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