

**BEFORE THE PUBLIC SERVICE COMMISSION
IN THE STATE OF MISSOURI**

Craig Mershon
Complainant,

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File No. EC 2013-0521

FILED

MAY 21 2014

Missouri Public
Service Commission

vs

Union Electric Company a/k/a Ameren Missouri
Respondent,

MOTION TO DISMISS THE REGULATORY JUDGE

This matter is before Mr. Morris Woodruff, Chief Judge and Secretary of the Missouri Public Service Commission. This request comes under 4 CSR 240-2. 120 Presiding Officers. Mr. Craig Mershon is requesting a new regulatory judge for the following reasons and it is applicable under the rule mentioned above. The reasons are as follows:

1. Mr. Daniel Jordan, Regulatory Judge has refused to allow Mr. Mershon to complete discovery which is under 4 CSR 240-2.090. Mr. Jordan refused to allow Mr. Mershon to complete his discovery and order to defend his case. Mr. Jordan was not a neutral party. When a judge practices is supposed to be a neutral party in any dispute. Mr. Mershon was entitled to discovery under production of documents, interrogatories, and request for admissions. None of these actions were filed and when Mr. Mershon did try to file a Motion for the Production of Documents his request was considered broad.

His request dealt with finding out the rules of the state, the Missouri Public Service Commission, and Ameren Missouri. Mr. Jordan as well as the others such as Ms. Sarah Giboney, Attorney Smith and Lewis LLP and Mr. Jeffrey Keevil, Attorney for the Missouri Public Service Commission also denied Mr. Mershon his right for discovery.

2. Mr. Jordan allowed Ms. Giboney and Mr. Keevil to be very rude toward Mr. Mershon. This happened on two occasions on both pre-hearings that were scheduled Mr. Mershon had to eventually leave because he was so upset and was treated in a very disrespectful manner not only by Mr. Jordan, but by Ms. Giboney and Mr. Keevil.

3. Mr. Jordan without just cause filed with the Commissioners a Report and Order which has been answered by the Commissioners defending their illegal actions toward Mr. Mershon. Mr. Mershon is in the process of answering Mr. Jordan's unfair, unjust Report and Order.

4. Mr. Jordan has out rightly discriminated against Mr. Mershon by allowing Mr. Keevil and Ms. Giboney to treat Mr. Mershon with a lot of disrespect and Mr. Mershon was unable to put in his opinions or his facts about his case. Mr. Mershon believes Mr. Jordan has a fair advantage on his part to win the case where as Mr. Mershon has an unfair advantage, Mr. Mershon does not have an attorney. He does not have anyone to listen to him where as Mr. Jordan will listen to Mr. Keevil and Ms. Giboney. This has been how it has turned out and both pre-hearings. Ms. Giboney consistently interrupts Mr. Mershon as he is attempting to speak and recites rules and regulations which Mr. Mershon does not have at this time.

With this being said Mr. Mershon is requesting a new regulatory judge that may be neutral and give Mr. Mershon a chance to do his discovery and have a fair hearing which Mr. Woodruff promised Mr. Mershon that would happened. As it stands now there is an open Report and Order that must be answered for Mr. Jordan and the Commissioners. Mr. Mershon believes that he has been treated very unfairly and positively knows it by the way he has been treated by this whole process. The process is very unfair for those who are people with disabilities, the elderly, the indigent, and minorities.

Therefore, Mr. Mershon is asking Mr. Woodruff to assign a new fair regulatory judge to his case and give Mr. Mershon a chance to present his case in a professional manner and be heard by the regulatory judge. This has not happened so far in this case. Respectively submitted,

Craig D Mershon

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To:**From:***Mona Lisa Woodruff**Craig Musher***Phone:** *573-526-6010***Pages:***7***Phone:****Date:***5/21/14***Re:****CC:***Thank you***Urgent**☒ **For Review**☒ **Please Comment****Please Reply**☐ **Please Recycle**