

EC-2024-0217

Brett Felber
VS
Ameren Missouri

Respondents undersigned counsels elaboration of the document fails to insert or base any claim, statute as to when the document was previously litigated.

It is not a previously decided or used in any decision that was used in prior litigational matter. Respondents claim is a deflection away from the facts that they know that www2.ameren.com is not a valid email address, therefore it is a counterfeit document.

At no time during EC-2023-0395, did the Complainant or Respondent challenge the assertion or did the document in question arise in any part of the claim. It was left out intentionally by the Respondent for that reason.

In addition, EC-2023-0395 didn't litigate the position or assertion or any conclusions of law or any part of the validation or counterfeit document of www2.ameren.com

Complainant moves to respectfully as the commission to grant a Summary Determination Judgment by default against the Respondent as the Respondent has failed to elaborate or submit anything in regarding to the document or the email address.

The Respondent was given until April the 4th to file a response , however under the open portion of a complaint they were given until April the 8th to file a response.

When the Complaint was re-opened and there was no objection to re-opening the complaint , again the Respondent asked for more time, in which the Commission granted Respondent to file an answer or file that they resolved the Complaint by April 22, 2024.4.22

This is just another one of the Respondents Con Artist and deceptive practices in which again, the third time have failed to file an answer to the Complaint and would rather hope the Commission rushes to dismiss a Complaint as the Respondent knows the email address and the document in question is a counterfeit document, in which why to the date and the 3rd time addressing it they have still failed to file an answer.

Respondent has waived any and all defenses on this matter and the Complainant has provided a surrounding amount of factual detail in which at this point cannot be contradicted by the Respondent, which is exactly why the Commission needs to grant the Complainants Motion for a Summary Determination and not only find the Respondent liable for submitting a document with a bogus email address to resemble a "payment agreement," but also it is a counterfeit agreement.

In addition under Missouri State Statutes counterfeit documents used in production to deceive or extort or misrepresent do not constitute the entitlement of a dismissal or do they fall into the category of allowing the Respondent to Dismiss a matter and allows for a matter to be reopened or rediscovered by any party or an intervening party wishing to engage.

The Commission should order Respondent and the Complainant asks the Commission to grant and order Respondent to file an answer to if www2.ameren.com is a valid email address or not .

If the Respondent cannot answer the question given, then the Commission under Commission Rules, Regulations and Tariffs must grant the Complainants Motion, as there are no material facts to dispute, because www2.ameren.com is NOT an email address and in addition the Commission should grant Complainants summary determination in the amount of \$ [REDACTED] for unjust enrichment.

I'll take it by the deflection and failure to answer the question towards the filing that the Respondent Ameren Missouri is conceding in this matter.

They are Con Artist, have been Con Artists, always will be Con Artists and their undersigned Counsel is a Con Artist as well and she's protecting their Con Artist and glorified grifting .

That is all that the Respondent is. Glorified Grifters and they've been caught, but Respondent would rather waste not only the Commission's time, but the Complainants time.

Brett Felber
April 23, 2024