

subpoenas do not seek relevant or material information, as required, and instead, only seek to further his “collateral attacks” regarding prior Commission filings, they should be quashed.

Felber’s subpoenas are also unduly burdensome and harassing on their face. In the subpoena to Ameren, for example, Felber requests that Ameren “bring all personal and corporate owned computers and servers” to the deposition so that Felber can purportedly inspect and search for “forged” or “altered” documents. In other words, Felber is seeking to conduct a forensic examination of *every single computer and server* in Ameren’s possession – both corporate owned and personal. Setting aside the fact that Felber’s forgery allegations are false and inflammatory—permitting Felber to perform a forensic examination of every single Ameren Missouri computer and server would violate countless federal and state laws, like those that protect personnel information, confidential account and financial data, federally-protected infrastructure information, and information protected by the attorney-client and work-product privilege, to name a few. Permitting him to conduct such a search would be the definition of an unduly burdensome, irrelevant fishing expedition. Felber’s subpoena requests are wildly burdensome and harassing and justify the imposition of a protective order, to prevent Felber from further circumventing prior Commission orders for the purpose of harassing Ameren and its affiliates.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONCLUSION

1 JUDGE CLARK: Hearing no objections Exhibit 124-C
2 is admitted onto the Hearing Record.

3 Please continue.

4 Q. (By Mr. Banks) To your knowledge when did Complainant
5 identify the alleged Pending Payment Agreement email date
6 discrepancy?

7 A. To the best of my recollection it was approximately
8 June twentieth.

9 Q. On Page 2 of Ameren Missouri's Exhibit 119-C you
10 explain the Senior Software Engineer also advised that if a
11 customer downloaded the Payment Agreement confirmation email
12 they would have the ability to edit the message?

13 A. Yes. I did.

14 Q. During the course of your job as a regulatory liaison
15 and working on Complaint cases do you ever reach out to software
16 engineers for information?

17 A. Yes. I do.

18 Q. Have you personally downloaded a confirmation email
19 and been able to edit the message?

20 A. Yes. I have. During the course of my investigation I
21 personally -- well, I found out how easy it was to edit emails.

22 I downloaded emails from my personal email box and was
23 able to edit those, not only from Ameren but from other sources
24 of email that I received. And I found you don't even have to
25 actually download the email in order to edit it. You can