EC-2023-0395

Brett Felber
VS
Ameren Missouri

Complainants Motion Before the Honorable Judge Clark for an immediate hearing pursuant to 55.15 of Ameren's Counsels fraud & pursuant to 55.20 Ameren's Counsel submitting libel, slander and defamation statements. Along with motion for immediate restoration of electric services pursuant to deceptive and illegal disconnect of services.

Complaint comes before the commission to submit the following.

1) Complainant can prove in Ameren's Counsel's state of original answer and affirmative answer's Ameren's Counsel submitted 7 articles of perjury statements in which he has been given evidence upon, knowing upon and submitted perjury statements to deceive the premises [redacted]. Complainant is prepared to ask counsel about these statements and counsel to answer these statements in an immediate hearing.

2) Complainant can prove that Ameren through counsel, Banks, Grubbs submitted not only a perjury statement, but statements of libel, slander and defamation, not only about him, but also his wife (Lisa Lambert) in its affirmative answers and defenses, along with in Ameren's Counsels direct data requests to the complainant, in which the complainant never stated and counsel made up its own interpretation and blanket statement, of libel and slander about complainant, and his wife.

3) Complainant can prove that Ameren's counsel submitted perjury statements and libel, slander and defamation statements and attached a Public Service Commission Director ([redacted], PSC), into that response of seeing the data requests.

4) Respondent's counsel Banks, Grubbs, purposely, knowingly and intent fully had the intent to include in an email attachment to complainant to articles of not only perjury against Complainant and slander, defamation and libel statements in which now has tainted the process by including a Public Service Commission official including them.

5) Complainant can prove that prior to any data request counsel is already in possession of all the data items requested, as they were emailed upwards of a month to two months early for Ameren and their counsel to see. In addition, they have been forwarded to the respondent through EFIS, however respondent failed to take the matter seriously and ignore the complainant's rectifiable solutions. In which complainant can prove that Banks, Grubbs, Engelbrecht and Krcmar are already in possession of each requested document, however, counsel hindered, stalled the process and knowingly already in having possession the documents and failing to restore electric services to an illegal

disconnection of service, continued to keep services off at premises [redacted].

6) In data request number 15 from Ameren's Counsel Banks and Grubbs submitted a lying, deceiving a perjury statement of "please admit you received a bill for electric service from Ameren dated May 4, 2023, indicating the amount due of $[redacted] due on May 29, 2023." Including [redacted] in the attachment of data request.

7) Complainant submitted to all parties, Banks, Grubbs, Krcmar showing a difference of the statement amount that Ameren claims was due on that shows the amount due was different and Ameren didn't have the correct balance and the balance shown due was $[redacted] on May 29, 2023, not the amount that Ameren's counsel claims.

8) Complainant submitted the real time balance showing the accounts name and account number showing in fact that complainant is correct to attached party [redacted], showing the balance due was $[redacted] on May 29, 2023.

9) Complainant calls on the commission and Judge Clark to have [redacted] sign a sworn statement showing complainant attached an email with the balance of $[redacted] due on May 29, 2023. Email was submitted at approximately 1:30 pm on Sunday July 16, 2023, to parties Banks, Grubbs, Krcmar, [redacted].

10) Ameren through counsel Banks, Grubbs is trying to seek discovery of Texas lawsuit materials under Missouri discovery statutes, in which he is seeking to overthrow the process and procedure of how to obtain discovery of a Texas lawsuit Attorney Misconduct.

11) Ameren through counsel lied, deceived the commission and the Honorable Judge Clark, in the continuation of keeping electric services at premises off and stating in line 25 of Ameren's counsels' response in affirmative answers and defenses to keep electric services off, in which Ameren, Banks, Grubbs, Engelbrecht are involved in a lawsuit. Perjury

12) Respondents counsel deceived commission and through perjury methods has known for a month that a lawsuit was filed against parties, however deceived the commission to attempt to keep services off.

13) In line 6 of Ameren's statement for Data Requests Submitted. Ameren has been in possession of the presented agreement in which Banks, Grubbs, Krcmar, Engelbrecht and Ameren illegally disconnected services, in which clearly showed a payment agreement date submitted by Ameren to the complainant. In fact, Banks, Grubbs, Engelbrecht, Krcmar have been in possession of the agreed payment arrangement date paperwork showing May 22, 2023, however, have purposely stalled, failed to mention the article in their affirmative answers or defenses, because Ameren and their counsel

know it would have warranted an immediately restoration of utility services and Ameren not only deceived. The complainant, but also the commission, by withholding it. Counsel received numerous copies on June 20th and June 21st, via email to Banks, Grubbs, Krcmar and Engelbrecht.

14) Complainant can prove that Ameren, through counsel is already in possession with 2/3rds off the data request submitted, as in good faith prior to any data request or information they wanted, however, Ameren through counsel has purposely with the malicious intent and knowingly with the malicious intent, continued to deceive the complainant and the commission through deception in illegally keeping utility services off. Also failed to disclose to the commission that Ameren was already in possession of the documents.

15) Complainant is prepared to submit and show all documents pursuant to rule 55.15 and 55.20 at requested immediate hearing in front of the commission and Honorable Judge Clark.

16) Complainant is prepared to show the commission and the Honorable Judge Clark exhibits and documents showing that Ameren failed to disclose that complainant already submitted 2/3rds of the documents to counsel via email and through EFIS.

17) Complainant respectfully asks the commission and Honorable Judge Clark to ask counsel, why counsel withheld truthful and information documents and data request that were already submitted to counsel and Ameren in good faith prior to any data request submission by complainant.

18) Complainant respectfully asks the commission and the Honorable Judge Clark to ask counsel why counsel withheld crucial information and documents that were delivered before email to counsel Banks, Grubbs in which would have warranted Ameren Missouri and their representatives to restore electric services to the premises for an illegal disconnection.

19) Complainant submits this request for an emergency hearing on the above actions for a video conference hearing on the above actions to prove complainants claim and show reasons and cause of deceptive and deceiving business practices, slander, libel, defamation, perjury, withholding crucial exhibits that have already been given to Ameren, and would have resulted in an immediate reconnection of services.

Whereas the complainant submits these two motions pursuant to rules 55.15 and 55.20 and requesting an immediate video hearing conference before the Honorable Judge Clark, no later than Tuesday July 18, 2023, for libel, slander, defamation. Ameren's malicious intent, knowledge and fraud withholding crucial documents to the commission and the honorable Judge Clark and perjury statements submitted by Ameren through counsel, Banks and Grubbs which would have warranted a reconnection of services.

Whereas the complainant submits this document on Sunday July 16, 2023, to introduce and prove their claim of respondent's deceptive practices. Malicious intent and fraudulent intent to withhold discovery data requested that have already been submitted to counsel. Slander, libel and defamation to outside parties. In addition, resulting in an immediate reconnection of utility services upon an emergency hearing before the Honorable Judge Clark, by no later than Tuesday July 18, 2023.

Complainant prays to the Honorable Judge Clark for an emergency hearing on the above matter.

Respectfully Submitted,
Brett Felber