

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Case No. EC-2026-0004

BRETT FELBER,
Complainant

v.

AMEREN MISSOURI,
Respondent

MOTION TO QUASH SUBPOENA

Complainant Brett Felber respectfully moves the Missouri Public Service Commission ("Commission") to QUASH the subpoena issued in the above-captioned matter. In support of this Motion, Complainant states as follows:

1. The subpoena does not properly address the correct records in which the funds at issue were held.
2. Each electronic document submitted by Complainant — or more accurately by Tegrity Midwest Dairy & Produce Farms LLC — reflects payments made from that entity, not from Mr. Felber personally.
3. The payment records clearly identify the payor as Tegrity Midwest Dairy & Produce Farms LLC and the payee as Ameren Missouri.
4. All electronic payment documents provided to Ameren Missouri or filed through EFIS show that payments were made by Tegrity Midwest Dairy & Produce Farms LLC, a non-party to this proceeding.
5. The custodial holder of any financial records related to such payments is Tegrity Midwest Dairy & Produce Farms LLC, not Complainant Brett Felber.
6. Under Missouri and federal law, an individual and a limited liability company are separate and distinct legal entities. (§ 347.069, RSMo; § 347.057, RSMo; Federal law recognizes corporate separateness).
7. Mr. Felber, as an individual complainant, is not the custodial holder of Tegrity Midwest Dairy & Produce Farms LLC's financial records.

8. Because Tegridy Midwest Dairy & Produce Farms LLC is not a party to this action, its financial records cannot be compelled through a subpoena directed at Mr. Felber.
9. To pursue records from Tegridy Midwest Dairy & Produce Farms LLC, Ameren Missouri would need to amend its subpoena and properly serve the entity, through counsel, consistent with discovery rules.
10. Missouri law and rules of civil procedure expressly restrict disclosure of financial records (§ 362.422, RSMo; Missouri Supreme Court Rule 58.01).
11. Federal banking privacy statutes (12 U.S.C. § 3402; 15 U.S.C. § 6801 et seq.) prohibit disclosure of financial records without consent or proper legal process.
12. If Ameren Missouri seeks discovery of Tegridy Midwest Dairy & Produce Farms LLC's records, the complaint would first need to be amended, and counsel would need to enter an appearance on behalf of that entity.

Because the subpoena improperly seeks financial records of a non-party LLC over which Mr. Felber has neither custodial possession nor legal authority, and because both Missouri and federal law prohibit such disclosure without proper process, the subpoena must be QUASHED in its entirety.

WHEREFORE, Complainant Brett Felber respectfully requests that the Commission grant this Motion to Quash and provide such further relief as it deems just and proper.

Respectfully submitted,

Brett Felber

Complainant

Dated: September 15, 2026