# **Before the Missouri Public Service Commission**

Case Number: EC-2026-0004

**Brett Felber (Complainant)** 

٧.

# **Ameren Missouri (Respondent)**

## Memorandum

# 1. Electronic Confirmation of Payments

Ameren Missouri already possesses electronic confirmation of Complainant's payments. Respondent's filing of a frivolous subpoena—while simultaneously ignoring who actually made the payments—demonstrates a failure to review the evidence already in their possession. There is nothing further to provide.

### 2. Altered and Deficient Documentation

The document Ameren submitted is altered, bogus, and counterfeit. It is missing multiple critical identifiers and is partially cut off. These deficiencies render the document unreliable and unusable. Ameren's actions demonstrate a clear intent to manipulate, alter, or mischaracterize the valid documents Complainant has already supplied.

#### 3. History of Document Alteration

Respondent's dissatisfaction arises not from a lack of evidence but from the fact that Complainant has produced:

- Factual telephone records and audio call logs;
- Precise citations to Missouri Public Service Commission rules, state statutes, and federal statutes that have been violated;
- Documented proof of payments made.

Rather than address these materials, Ameren seeks ways to alter or discredit them.

# 4. Relevant Precedent (EC-2023-0395)

This proceeding mirrors the misconduct previously evident in Case No. EC-2023-0395. Once again, Ameren Missouri and, by extension, the Commission are engaging in practices designed to obscure lawbreaking and avoid accountability.

# 5. Commercial Banking Protections

Regardless of any subpoena, Ameren Missouri and the Commission must recognize that commercial banking institutions require an executed Non-Disclosure Agreement (NDA) before releasing treasury or financial records. This safeguard applies even in the face of a Commission order. Ameren and the Commission's refusal to acknowledge this requirement

constitutes further statutory and regulatory violations.

#### 6. Pattern of Misconduct

Ameren Missouri and the Missouri Public Service Commission have engaged in a consistent pattern of document alteration, concealment, and statutory violations. They have been provided documents they cannot refute or lawfully alter, which explains their reliance on improper subpoenas and procedural tactics.

#### Conclusion

Ameren Missouri and the Missouri Public Service Commission have demonstrated a disregard for statutory obligations and Commission rules. Their reliance on altered documents, frivolous subpoenas, and refusal to recognize banking confidentiality underscores their pattern of lawbreaking.

Respectfully submitted,

#### **Brett Felber**

Complainant September 15, 2025

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Memorandum was served upon all parties of record in this proceeding, including counsel for Ameren Missouri and Staff of the Missouri Public Service Commission, via electronic mail and/or U.S. Mail, postage prepaid, this 15th day of September, 2025.

### **Brett Felber**

Complainant