

# BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Case No. EC-2026-0004

BRETT FELBER, Complainant

v.

AMEREN MISSOURI, Respondent

## MOTION TO QUASH SUBPOENA

Comes now Complainant, Brett Felber, and pursuant to Missouri statutes, federal statutes, and Commission rules, respectfully moves the Commission to quash the subpoena issued by Respondent Ameren Missouri seeking financial records, and states as follows:

- 1 Pursuant to Mo. Rev. Stat. § 408.683, a party seeking access to a customer's financial records by subpoena must provide the customer with notice, including a copy of the subpoena, on or before the date the subpoena is served on the financial institution. Ameren Missouri failed to provide Complainant such notice, violating this statutory mandate.
- 2 Pursuant to the Federal Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., any government authority seeking financial records from a financial institution must provide advance notice to the customer. Ameren Missouri has disregarded this requirement.
- 3 Respondent's subpoena seeks records from personal accounts unrelated to Complainant's businesses, and from the wrong financial institution. The subpoena is unduly burdensome, harassing, and irrelevant.
- 4 Respondent issued its first set of discovery requests on September 17, 2025, attempting to compel financial records without affording Complainant the time required under Commission rules, an abuse of discovery procedure.
- 5 Complainant has already filed a Motion to Strike Subpoena, which has been disregarded by the Commission.
- 6 The Commission and Ameren Missouri are refusing to allow Mr. Felber access to documents pertaining to this matter by blocking him from the EFIS filing portal, contrary to Mo. Rev. Stat. § 386.410, which entitles parties to full access to the record. This denial of access is unfair, prejudicial, and violates Complainant's statutory right to review filings and evidence in his own case.

WHEREFORE, Complainant respectfully requests that the Missouri Public Service Commission:

- Quash the subpoena issued by Ameren Missouri;

- Recognize Ameren Missouri's violation of Mo. Rev. Stat. § 408.683 and 12 U.S.C. § 3401 et seq.;
- Compel the Commission to provide Complainant full access to EFIS filings pursuant to Mo. Rev. Stat. § 386.410;
- Grant such other relief as is just and proper.

Respectfully submitted,

/s/ Brett Felber  
Brett Felber, Complainant

[REDACTED]  
[REDACTED]  
[REDACTED]

#### CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of September, 2025, a true and correct copy of the foregoing Motion to Quash Subpoena was served via EFIS and/or U.S. Mail to all parties of record in this proceeding.

/s/ Brett Felber