

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

FILED
September 23, 2025
Missouri Public
Service Commission

Case No. EC-2026-0004

BRETT FELBER,
Complainant,

v.

AMEREN MISSOURI,
Respondent.

MOTION TO COMPEL BANK RECORDS

COMES NOW, Complainant **Brett Felber**, and pursuant to 20 CSR 4240-2.090 (Discovery) and applicable Missouri law, respectfully moves this Commission for an Order compelling the production of specific bank records necessary to resolve disputed issues in this proceeding. In support thereof, Complainant states as follows:

- 1) **Failure to Identify Author and Bank Source of Counterfeit Document.** Respondent Ameren Missouri has failed to produce the name, author, and bank account information associated with the specific counterfeit document they have placed into this record.
- 2) **Possession of Complainant's Payments.** Complainant believes that compelling the production of these financial records will conclusively demonstrate that Ameren Missouri is, in fact, in possession of Complainant's payments.
- 3) **Evidence of Deposited Funds.** These records will show that Complainant's payment, in the precise amount of \$ [REDACTED], was deposited and is currently held by Respondent.
- 4) **Chase Bank Records.** Complainant identifies **Chase Bank, N.A.** as a financial institution in which Ameren Missouri maintains accounts that hold Complainant's funds. Registered Agent (Missouri): CT Corporation System, [REDACTED].
- 5) **Wells Fargo Bank Records.** Complainant further identifies **Wells Fargo Bank, N.A.** as a financial institution in which Ameren Missouri maintains accounts that hold Complainant's funds. Registered Agent (Missouri): CSC-Lawyers Incorporating Service Company, [REDACTED].
- 6) **Timeframe of Requested Records.** By compelling production of bank account statements and records from **June 2025 forward**, the Commission will be able to determine conclusively whether Complainant's payments were deposited into these accounts.

7) **Failure to Provide Discovery.** Respondent has failed to provide the requested financial information within the discovery request period, thereby prejudicing Complainant's ability to present evidence and violating 20 CSR 4240-2.090(1)–(2), which obligates parties to timely respond to discovery.

WHEREFORE, Complainant respectfully requests that the Commission issue an **Order Compelling Ameren Missouri** to produce forthwith:

- All account statements, deposit records, and transaction records from **Chase Bank, N.A.** and **Wells Fargo Bank, N.A.** covering the period of **June 2025 to present**,
- Identification of the author(s) and custodian(s) of the counterfeit financial document placed into the record,
- Any and all documentation showing the deposit and retention of Complainant's payment of \$ [REDACTED] .

Respectfully submitted,

/s/ **Brett Felber**

Complainant

[REDACTED]
[REDACTED]

Date: September 23, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Motion to Compel Bank Records** was served this 23rd day of September 2025 upon all counsel of record and parties via the Missouri Public Service Commission's EFIS electronic filing system and by U.S. Mail, first-class, postage prepaid.

/s/ **Brett Felber**

Complainant