OPINION SUMMARY
MISSOURI COURT OF APPEALS EASTERN DISTRICT

DIVISION THREE

C.L.B., Respondent, v. C.E.H., Appellant.	)))))))))))	ED113972 Filed: November 17, 2026

Appeal from the Circuit Court of St. Louis County
The Honorable Justin Wallace Ruth, Judge

SUMMARY:
Appellant C.E.H. appeals the court's renewal of Respondent C.L.B.'s full order of protection against him. Appellant raises two points. First, he argues the court applied an incorrect standard. Second, he asserts that Respondent failed to present substantial evidence justifying the renewal.

REVERSED.

DIVISION THREE HOLDS:
We reverse based on point one, which is dispositive. When renewing the order of protection, the court relied on non-threatening, undirected social media posts which are not objective evidence that Respondent would be in an immediate danger of abuse considering they lack any threats of violence or abuse. *L.M.M. v. J.L.G.*, 619 S.W.3d 593, 597 (Mo. App. E.D. 2021). Then, the court applied an incorrect and less stringent standard than Missouri law requires when it justified renewal "in order to unequivocally convey [Appellant's] actions and behavior towards [Respondent] will not be tolerated." Before renewing a full order of protection, Missouri law requires the court to find that "expiration of the full order will place the petitioner in an immediate and present danger of abuse." *K.C. v. Chapline*, 635 S.W.3d 221, 230 (Mo. App. W.D. 2021) (citations omitted).

Opinion by: Thomas C. Clark II, Judge

Virginia W. Lay, Presiding Judge; Angela T. Quigless, Judge, concur.

Attorney for Appellant: Jonathan Gilbert Bremer

Attorney for Respondent: William Joseph Halaz III

This summary is not part of the opinion of the court. It has been prepared for the convenience of the reader and should not be quoted or cited.