21SL-DR00305 Justin Wach v Alexandra Dean
Intervenor's Exhibit 17

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IN THE CIRCUIT COURT OF SAINT LOUIS COUNTY

STATE OF MISSOURI

ALEXANDRA MARIE DEAN Petitioner, vs. JUSTIN DUANE WACH Respondent, BRIAN DUANE WACH and GINA MARIE DEAN Intervenors.	)	Case No. 21SL-DR00305 Division 15

FILED
JUN 15 2023
JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

MOTION TO DISMISS FOR LACK OF JURISDICTION

COMES NOW, Petitioner, submits this Motion to Dismiss for Lack of Jurisdiction before Division 15 of the 21st Judicial Court as follows:

1. Since 2021, the Petitioner has been fighting for custody of her offspring, S.J.W. and C.A.W, in Division 38 of the Saint Louis County Family Court. Currently, this division is vacant and the Petitioner is unable to book a status conference with Judge John R. Laster at this time. This is due to the fact that Judge John R. Lasater is no longer a family court judge, and has moved to Division 15. The Petitioner contends that, due to several reasons, Judge John R. Lasater is not the appropriate judge for this case.

   Judge John R. Laster failed to allow the Petitioner and her former attorney, John Fenley, to move this case out of Saint Louis County. Judge Lasater denied John Fenley's former request to change the venue despite no one involved, in this case, having ever lived in

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Saint Louis County. When this case began the Petitioner and her offspring lived in Saint Louis City at 7614 Virginia Ave. Saint Louis, MO. 63111. The Petitioner and her offspring then moved to 1234 San Jacinto Ct. St. Louis, MO. 63139. At this residence the Petitioner's offspring were illegally kidnapped from her home, on 9/13/21, due to false police reports made by Intervenor, Gina M. Dean. On this day several Saint Louis City Police officers broke into the Petitioner's private residence, without a warrant, and then removed S.J.W. and C.A.W. from their home with no court order or permission from D.C.F.S. The Intervenor, Gina Dean, then took emergency custody of the Petitioner's offspring at her home, [redacted]. The Intervenor Gina Dean then later withdrew from the case and passed custody off to Intervenor Brian Wach, who resides at [redacted]. At this time, there is an apparent lack of subject matter pertaining to jurisdiction. Judge Laster, of the Saint Louis County Family Court, simply does not have jurisdiction over this case according to Missouri Law (Sections 452.480 and 452.482).

2. Furthermore, the Petitioner is challenging the lack of personal jurisdiction that the 21st Judicial Court holds over this custody matter. The Saint Louis County Court has zero authority over, not just some, but all of the parties involved. To establish personal jurisdiction, the court must have sufficient connections to the individuals or entities involved in the case. Since it is a fact that this court does not have jurisdiction over any of the involved parties, none of the motions or court orders hold any significant value or legal effect due to the improper and random choice of venue. This includes Laura Stobie's recent Motion, on behalf of Intervenor Gina Dean, to Suspend Visitation and- or to Reopen the Evidence filed on 5/30/23. The Petitioner requests for the immediate return of

her offspring, seeing as Judge John R. Lasater has a clear lack of jurisdiction over the parties in this case. The Petitioner asserts that this court never had authority to make decisions regarding the custody of her offspring in the first place and, therefore, seeks the dismissal of this case for lack of jurisdiction. The Petitioner further requests that the case be dismissed with prejudice to permanently bar any future attempts by the other parties to illegally acquire custody of her offspring.

3. In addition, Division 15 does not even have the authority to hear this specific type of case regarding custody of children, seeing as it is for circuit civil and criminal matters. This case has dragged on for two years, despite the Petitioner has proven herself fit to this court on many levels. It's apparent that this case would have been settled more appropriately and timely at a venue that does hold jurisdiction.

4. Since Judge John R. Lasater has failed to acknowledge that all of the orders he signed to remove [redacted] from the Petitioner's custody were based on bias and hearsay, as well as serious acts of discrimination, the Petitioner requests that this Motion to Dismiss for Lack of Jurisdiction be granted to ensure her rights are being abided by under the Missouri Constitution. There is simply no reason Judge John R. Laster should not dismiss this case, and return the Petitioners offspring, unless he is acting with malicious intent.

5. It is only fair that the Saint Louis County Family Court release the Petitioner from further scheduled hearings at this venue, seeing as it is not at all lawful to consider Division 15 a suitable forum for a custody case. The Petitioner deems it to be cruel and usual that she was scheduled for so many lengthy and costly trials at this venue, despite the 21st Judicial Court holding zero jurisdiction. The Petitioner was chambered out of several of her court

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

hearings, which is highly unconstitutional according to the Fourteenth Amendment. Judge Lasater even allowed the Petitioner to be brutally attacked emotionally and spiritually for hours by the Intervenors, their attorneys, and biased witnesses who were caught in many lies while giving false testimony. The Petitioner was discriminated against for her religion and she was even sexually harassed by the other attorneys. The Intervenor's and their attorneys even went as far as demonizing, shaming, and sexualizing the Petitioner's breastfeeding relationship with her baby and toddler. The Petitioner's personal pictures and videos, which are protected by law, were illegally downloaded, distributed, and viewed by the Intervenors and their attorneys. The attorneys involved attempted to mislead the Petitioner during questioning, forged and manipulated documents, and used such a disrespectful tone of voice with the Petitioner and her witnesses that even Dr. Edward Flynn, Alexandra Dean's therapist, said he was going to need therapy after being subjected to such emotional abuse. These behaviors simply do not uphold the Missouri Rules of Professional Conduct for attorneys who are expected to advocate for fairness and integrity. Therefore, the Petitioner further moves this Court for a dismissal with prejudice to see that this case is permanently closed to ensure she is not subjected to any future undue hardships or vexatious legal actions from the opposing party's legal representatives.

6. Moreover, due to the fact that the Intervenor's Conclusions and Finding of Facts of Law and their parenting plan, as well as the GAL's recommendation, requests that the Petitioner be alienated from her offspring based on evidence which lacks any real proof and is discriminatory, as well as highly abusive in nature, it should be deemed as invalid and granted zero legal effect (Section 452.375). The Petitioner seeks relief by moving Judge Lasater to strike both the GAL's recommendation and the Intervenor's documents,

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

motions, and pleadings and then dismiss this case permanently. If done so this would be upholding the established rules and guidelines which ensure fairness, impartiality, and integrity expected of judges according to the Missouri Code of Judicial Conduct (Section 482.110).

7. In conclusion, The Petitioner asserts that it is not in the best interest of her or her offspring or to share custody with individuals who have committed grave crimes on her. The actions and history of said individuals pose a significant risk to the well-being and safety of her offspring. The Petitioner contends that allowing such individuals to have custody or visitation rights would not only endanger the children but also undermine the Petitioner's ability to provide a secure and stable environment. The Petitioner firmly believes that this Court should have never allowed individuals with such a criminal past, and malicious demeanor towards her, to possess any decision-making power or rights over her offspring. Therefore, the Petitioner requests that this case be dismissed with prejudice, thereby ensuring that the Petitioner and her offspring are permanently protected from any further association or potential harm caused by the Intervenors and the Respondent.

8. Lastly, in addition to the present Motion to Dismiss for Lack of Jurisdiction, the Petitioner has submitted a separate Motion for family access, which provides detailed information regarding evidence and the Petitioner's requests for appropriate action to be taken in this case. The Petitioner requests that this Motion for Family Access be considered and addressed in conjunction with the Motion to Dismiss, as both motions are closely related and pertain to the well-being and best interest of [redacted]

9. In response to Laura Stobie's motion filed on 6/14/23, she shows a clear lack of knowledge and displays a pattern of misrepresenting the law. Stobie's statements are

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clearly fabricated regarding the jurisdictional authority of the Circuit Court in accordance with Section 478.070 of the Missouri Revised Statutes. While it is true that the Circuit Court shall have original jurisdiction over all cases and matters civil and criminal, it is important to clarify the specific interpretation of this provision. Contrary to Stobie's assertion, Section 478.070 does not grant unfettered jurisdiction to any civil court within the state of Missouri. Rather, it emphasizes the concept of "proper court," signifying that jurisdiction should be exercised by the court that is most appropriate and closely related to the matter at hand. Specifically, this provision recognizes the significance of the children's residence and establishes that the proceedings ought to be conducted in the court where the children have resided for a continuous period of at least six months. By suggesting that any court within the state may exercise jurisdiction, Stobie has mischaracterized the intention and application of the law. The objective of Section 478.070 is to ensure that custody cases are heard in the court that is most familiar with the children's circumstances and can make informed decisions based on their best interests. It is imperative that the involved attorneys adhere to the legislative intent behind Section 478.070 and respect the children's well-being by initiating proceedings in the appropriate court, as mandated by the law.

10. The Petitioner further objects to Stobie's misrepresentation of Missouri law, specifically regarding Missouri Law Section 452.740. Stobie claims, erroneously, that this law allows any court within the state of Missouri to exercise jurisdiction in matters concerning child custody. However, it is evident from the plain language of Missouri Law Section 452.740 that it specifies the proper court within the state may exercise jurisdiction. Stobie further misrepresented the law, to suit her agenda, by claiming any court within the entire state

may be granted authority over the parties in this case despite the county they resided in. It should go without being said that the proper court, within the state, clearly has jurisdiction over the case. Not to mention, this interpretation properly aligns with the guidance provided by the court clerks, of every county in the state of Missouri, when approached for information regarding filing proceedings in the appropriate county. The Petitioner would like to draw the court's attention to exhibit (a). https://www.dropbox.com/s/5kx8svajuoz6c8g/Video%20Jun%2014%202023%2C%204%2038%2043%20PM.mov?dl=0 As you can see the court clerk of Saint Louis County will affirm, it is mandatory to file custody proceedings in the county where the children have resided for a continuous period of six months. Given that [redacted] had resided with the Petitioner in St. Louis City, for several years before they were illegally kidnapped, it defies all logic and reason that this custody hearing was initiated in St. Louis County. This alarming discrepancy raises serious concerns regarding potential corruption, collusion, and procedural improprieties that have influenced the proceedings of this case thus far. In light of these discrepancies and misrepresentations, the Petitioner kindly requests that any further statements or interpretations made by the Intervenor's attorneys reflect the Missouri laws and provisions accurately. The Petitioner would like to take this opportunity to remind the court that if a lawyer intentionally misrepresents the law or engages in unethical conduct, they may be subject to disciplinary action by the Missouri Supreme Court's Office of Chief Disciplinary Counsel. The Missouri Rules of Professional Conduct govern the conduct of attorneys in the state, and violations can lead to disciplinary measures, including reprimand, suspension, or even disbarment. Additionally, if a lawyer's misrepresentation or misconduct has resulted in harm or

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

damages, such as financial loss or adverse effects on the custody case, it may be possible to pursue legal recourse through a civil action. The poor conduct which has been openly displayed by Stobie, and many others, will involve the Petitioner filing a complaint against them, as well as seeking compensation for the damages they caused, and rightfully requesting full participation during the reopening and review of this custody case.

11. To reiterate, under Missouri law the jurisdiction for child custody matters are determined based on the Uniform Child Custody Jurisdiction and Enforcement Act (UCCJEA). The UCCJEA is a uniform law adopted by most states, including Missouri, to provide guidelines for determining jurisdiction and enforcing child custody orders across state lines. Generally, the UCCJEA states that the court with jurisdiction to make an initial custody determination is typically the court in the child's "home state." The home state is defined as the state where the child has lived with a parent or a person acting as a parent for at least six consecutive months before the custody case is filed. It is important to note that this provision automatically implies that the county, within the state where the child has lived, is a determining factor for jurisdiction rather than simply granting jurisdiction to any court within the entire state. Under the UCCJEA, the court with jurisdiction to make an initial child custody determination is implied to be the PROPER court within the child's "home state." Just because the jurisdictional matter regarding the specific provision, that focuses on the county within the state where the child has lived, is not explicitly stated within the UCCJEA does not mean any court in the entire state may automatically be granted jurisdiction over whichever parties they so desire. The UCCJEA primarily intends to address interstate child custody jurisdiction and does not delve into specific county-level jurisdiction within a state simply because it is directly enforced by the

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

employees of the court system. The determination of the county within the state where the child has lived for the required period of time is always a factor considered by the court within that state.

12. Furthermore, the Petitioner would like to invoke the provisions of Missouri law section 51.045, which states that "For good cause shown, the court may extend the time to file a motion to transfer venue or allow the party to amend it." In Missouri, if a court does not have jurisdiction over a custody case then, at any point during the proceedings, it is deemed to be appropriate to file a motion for a change of venue or to have the case dismissed for lack of jurisdiction. The Petitioner has firm evidence, which grants her a compelling reason to request an extension of time to file the appropriate motion, based on the circumstances surrounding her previous legal representation. Regrettably, the Petitioner's former lawyer, who was entrusted with representing her best interests, was engaged in collusive activities with the opposing party's attorneys. Despite the Petitioner's repeated demands, John Fenley refused to file a motion to change the venue, even though it is abundantly clear that St. Louis County lacks jurisdiction over this case (see exhibit b). https://www.dropbox.com/s/mon1ahbemzc7uoa/John%20refuses%20to%20move%20case.mov?dl=0 It is important to note that the Petitioner's attorney had every opportunity to rectify the jurisdictional issue but failed to fulfill his professional obligations. This egregious breach of duty by the Petitioner's former attorney renders the current circumstances appropriate to file a motion to have this case dismissed for lack of jurisdiction. Consequently, The Petitioner has been compelled to dismiss her corrupt attorney and is now representing herself in this matter. The Petitioner wishes to further emphasize that she possesses substantial evidence that demonstrates her previous

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

attorney's deliberate falsification of documents and his dereliction of duty in handling her case (see exhibit c).

https://www.dropbox.com/s/rzavp5wpzlujut2/2023-5-31-0-59-33.mp4?dl=0 This evidence clearly indicates a malicious intent to undermine the Petitioner's position as the appropriate guardian, and loving mother of [redacted] and ensure an unfavorable outcome for her. The Petitioner intends to present this evidence before the court when the case is reopened for the submission of additional evidence.

13. The Petitioner would like to point out that in general, conflicts of interest can arise when an attorney's representation of one client interferes with their ability to advocate effectively for another client. It is apparent that the two Intervenors in this case, who previously had separate lawyers, have suddenly decided to have only one lawyer represent both of them. This raises concerns about a clear conflict of interest. A lawyer's duty is to act in the best interests of their client, and representing two parties with potentially conflicting interests might present challenges. In cases involving multiple intervenors in a custody dispute, it is imperative for the court to prioritize the best interests of the children. The court shall diligently consider all relevant factors and strive to make decisions that promote the children's well-being. However, in instances where the Intervenors have demonstrated a pattern of alienating the Petitioner, who has maintained a positive and loving relationship with her offspring, and where the Intervenors are known to be highly abusive towards the Petitioner, allowing them both to engage in a custody battle against her may constitute an unjust practice akin to a concerted effort to undermine and congregate against one party. Such circumstances raise concerns of corruption and collusion, suggesting a motive to exploit the family's unfavorable situation for financial

gain rather than acting in the children's best interests. Therefore, the court must exercise particular vigilance in ensuring fairness and impartiality in these proceedings to avoid perpetuating harm and further division within the family. Since the two intervenors have apparently aligned their legal representation and this alignment has resulted in an imbalance of justice for the Petitioner, it should be carefully evaluated by the court. The court should thoroughly assess the evidence and arguments presented by all parties and their attorneys involved separately to ensure a fair and just decision is reached.

14. The Petitioner would like to address Section 17 of Stobie's suggestions in opposition to her motions filed. The Petitioner respectfully requests the court's consideration of the following points. First and foremost, the Petitioner would like to clarify that to date, neither party has received a signed Finding of Facts and Conclusions of Law from Judge Lasater. There is no official record of established Findings of Facts or Conclusions of Law in this case at this time. It is important to emphasize that any claim made by the opposing party suggesting otherwise is misleading and misrepresents the current state of affairs. The assertion made by Stobie that the Petitioner's Motion of Family Access contains untrue statements, falsities, and legal conclusions unsupported by the law and facts of this case is a subjective interpretation of the opposing party. Without a signed Finding of Facts and Conclusions of Law, it is premature to make such claims, as they lack a legal foundation. It is essential to the fairness and integrity of this case that all parties adhere to the principles of transparency and accuracy. Misrepresenting the existence of an established Finding of Facts and Conclusion of Law creates an unfair advantage and may unduly sway the court's judgment. Thus, it is imperative that the court views Stobie's assertion with caution and considers it unfounded until such time as an official finding is provided. In

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

Electronically Filed - ST LOUIS COUNTY - July 26, 2023 - 12:54 PM

light of the above, the Petitioner respectfully requests the court to dismiss Stobie's claim of untrue statements and falsities in the Petitioner's motion of family access. The Petitioner also urges the court to caution Stobie against misrepresenting the existence of established Findings of Facts and Conclusions of Law, as it may jeopardize the integrity of this case.

15. In the case at hand, it is important to examine the claims made by Stobie regarding the Petitioner's alleged violation of The Domestic Relations services supervision rules. While Stobie asserts that the Petitioner engaged in inappropriate behavior and was suspended from her visitations, it is crucial to note that these claims lack any concrete evidence to support them. In contrast, the Petitioner possesses compelling video evidence that suggests the Domestic Relation Services has fabricated many accusations, in their Motion to Suspend Visitation, inorder to cover up their own failure to report instances of child abuse (See exhibit d).
https://www.dropbox.com/s/povs17w612gyjkr/Video%20May%2013%202023%2C%2010%2011%2051%20AM.mov?dl=0 The Petitioner's offspring reportedly disclosed instances of serious sexual and physical abuse directly to her, and despite the Petitioner's efforts to bring this to the attention of D.R.S, they ignored the claims and refused to document them in their notes or report them to the appropriate authorities as mandated reporters. This behavior raises significant concerns about their adherence to their responsibilities. Furthermore, it is deeply troubling that the Intervenor's attorneys appear to be relentlessly alienating the Petitioner without any substantiated evidence of wrongdoing. This raises questions about the attorney's intentions and suggests a personal agenda to defame the Petitioner and hinder her pursuit of justice. Such conduct is highly

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unethical and should not be tolerated within the legal system. Additionally, it is crucial to note that the Petitioner has never been charged with child abuse or neglect. Despite repeated visits from the Department of Children and Family Services (DCFS) prompted by the Intervener's false claims, each investigation concluded that there was no evidence of abuse or neglect. Therefore, it is baseless and potentially defamatory for the other party or their attorneys to continue alleging that the Petitioner endangers the welfare of her minor children. In light of these facts, it is evident that the Petitioner has been unjustly targeted and subjected to false allegations without any substantial evidence. It is imperative that the court carefully evaluates the credibility of the claims made by the Intervenors and their attorneys, considering the lack of proof and the significant concerns surrounding the Domestic Relation Services' handling of the reported abuse. The Petitioner's track record of compliance with investigations and her demonstrated fitness as a parent should be given due consideration in this case.

16. It is deeply concerning and legally alarming that Stobie would even suggest that the Petitioner's Motion for Family Access should not be granted any legal effect seeing as there are no legitimate reasons or solid evidence proving her visitations should have been denied. The Petitioner, like any other citizen, is entitled to equal legal protections and rights under the Missouri Constitution and laws. Treating her as if she should be subject to different standards or mistreatment by the legal system constitutes discrimination, which carries severe legal penalties. The principle of equality before the law is a fundamental pillar of a fair and just society. Denying the Petitioner her right to pursue a Motion for Family Access based on unfounded claims or personal biases is a clear violation of her constitutional rights. All individuals, regardless of their personal

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circumstances, deserve fair and equal treatment within the legal system. It is essential for the court to recognize and uphold the Petitioner's rights, ensuring that she is afforded the same opportunities and protections as any other party involved in this legal proceeding. Any attempts to discriminate against the Petitioner based on baseless assertions or personal motives should be strongly condemned and rectified, as they undermine the principles of justice and fairness that the legal system is designed to uphold.

17. https://www.youtube.com/watch?v=z_Re_bX118k The video in this link exposes the collusion between Elaine Pudlowski, Jennifer Piper (The Petitioner's former attorney, John Fenley's, associate of R.H.F. Legal) Kelly Chevalier (The Respondent's former attorney), Laura Stobie (Intervenor, Gina Dean's, current attorney), Sarah Pleban, Henry Miller, Art Nissenbaum, Sharon Remis , Rachna Lien, Justin Ruth, Amy Diemer, Greg Brough, Ann Bauer, Deborah Roeder, Venus Jackson, Lisa Sigmund, Shevon Harris, David Betz, Mary Davidson, Lynn Reichert, Shevon Harris, Mat Eilerts, Cynthia Albin, Sylvia Pociask, Maia Brodie, and many others. Viewers witnessed mass amounts of criminality during this disturbing zoom meeting which consists of, but is not limited to, conspiring to case fix, money laundering, and their plans to racketeer in mass numbers. They also talked of their plans to silence victims of this corrupted operation and slandered a reliable news source, "The Daily Docket" by claiming, "fake news!" These GALs are shown pooling money together, to hire a forensic team, with their goal being to track down the "Daily Docket News" journalists who have been exposing their criminality. These GALs are seen constructing an elaborate scheme to launder the money they were using for illegal means. During this zoom call viewers even witnessed these GALs partaking in evil laughter and claiming that it would be comical to take on the

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surname, "Cash for Kids!" Even more alarming, they stressed concern for those in their greasy GAL posse being exposed, and then dropping out of hearings, as well as their corrupted psychologists, therapists, counselors, and forensic psychologists. https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:16185fbe-2567-4466-96fa-7650f601433e This link provides the transcript of this zoom call with a full list of the affiliated members. There has also been an alarming amount of resistance among the community regarding Laura Stobie's position as a GAL. https://www.facebook.com/laurahawkstobieGAL?mibextid=ZbWKwL This link shows the communities disgust with the malevolent work Stobie has done, as a GAL, and her ties with this greasy GAL posse. The Petitioner asserts that Laura Stobie is a criminal and that it's appalling that Gina Dean pays her to stalk the Petitioner's social media accounts. Laura Stobie is known for giving false testimony regarding the Petitioner, with far fetched narratives, that have even been considered sexually harassive in nature. Seeing as Laura Stobie has conspired to harm journalists in Saint Louis, she should have never been granted access to the Petitioner's sensitive information and records. When case No. 21SL-DR00305 is reopened for evidence, the Petitioner plans to demonstrate how Laura Stobie has colluded against the Petitioner, while seeking justice, and has attempted to defame her on a malicious level in order to fix this case.

18. https://www.justice.gov/opa/pr/five-charged-connection-covid-relief-fraud-scheme This article highlights how five individuals had been charged in an indictment unveiled for their alleged involvement in a fraudulent scheme aimed at obtaining over $1.1 million in forgivable Paycheck Protection Program (PPP) loans. The scheme, which violated the Coronavirus Aid, Relief, and Economic Security (CARES) Act, involved filing

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fraudulent loan applications with the Small Business Administration (SBA), with guarantees provided by a federally insured financial institution. According to the indictment, the defendants knowingly submitted multiple PPP loan applications using the names of businesses that had no genuine operations or employees. They allegedly misrepresented the number of employees and payroll expenses in these applications. In support of their fraudulent claims, the defendants are accused of submitting counterfeit tax documents. In total, they sought over $1.1 million in funds through this illicit scheme. It is worth noting that one of the individuals indicted in this case is Robert Hamilton of R.H.F. Legal (John Fenley's law firm). Robert Hamilton is the principal associate and founding member of R.H.F. Legal. He is also responsible for hiring John Fenley onto his legal team. Additionally, the money laundering methods employed by Robert Hamilton and his associates bear a striking resemblance to the techniques used by the "Cash for Kids" posse in their money laundering activities, which involved fictitious clients. Furthermore, John Fenley has not only colluded against the Petitioner during the trial regarding this case but has also been caught case fixing in other instances, custody case no. 14SL-DR02617-01, which also took place in the 21st Judicial Court. The outcomes of this unjust trial resulted in the maliciously forced removal of D. Love from her loving and fit mother, Angela Freiner.

19. In light of the extensive evidence that custody case 21SL-DR00305 is fixed, and has many corrupt players, the Petitioner again moves this court to grant this Motion to Dismiss with prejudice for Lack of Jurisdiction and also immediately returning her offspring, [redacted] seeing as they were obtained through means of illegal kidnapping and kept away from her through clear collusion and racketeering.

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Further evidence, reguaring this case, can be found on the exhibit list attached to the Petitioner's Motion For Family Access filed on 6/6/23.

By: /s/ Alexandra M. Dean. Petitioner. 2215 Montana St, St. Louis, MO 63118 314-323-8267 consciousssparrow1719@gmail.com

CERTIFICATE OF SERVICE: I hereby certify that on the 15th day of June, 2023, a true and exact copy of the foregoing was served via e-filing system to all parties of record. /s/ Alexandra Dean.

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[redacted] to: 21mypleadings, lewandowski.beth, Justin Wach, lstobie, Jackiegonzlawyer 06/15/2023 02:32 AM

I will be at the courthouse before the end of the work week to have the proper fee waiver notarized. I will be bringing a physical copy of the amended Motion of Family Access and the exhibit list submitted on 6/6/23, as well as this Motion to Dismiss for Lack of Jurisdiction, to obtain a file stamp on each motion.

Thank you! □

Alexandra M. Dean

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CIRCUIT CLERK, ST LOUIS COUNTY

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