

Master - Respondents Motion To Dismiss Case # 2611-PN00554

This PDF is a Master Compilation of a Five Part Motion to Dismiss with minor formatting variance between Master and Individual PDF documents.

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IN THE 11TH JUDICIAL CIRCUIT COURT OF ST. CHARLES COUNTY, MISSOURI

ANTHONY R. FRIEDMAN, Petitioner,

v.

ALBERT B. PEPPER, Respondent.

Case No.: 2611-PN00554

RESPONDENT'S EXECUTIVE SUMMARY AND MEMORANDUM IN SUPPORT OF MOTION TO DISMISS

TO THE HONORABLE WILLIAM BYRNES DIV. 12 OF THE 11TH JUDICIAL CIRCUIT COURT:

Respondent, Albert B. Pepper Jr., respectfully submits this Executive Summary in support of his Motion to Dismiss the Petition for Order of Protection with Prejudice.

I. PRELIMINARY STATEMENT

This matter is not a safety emergency; it is a professional and retaliatory dispute. Petitioner, a licensed attorney and officer of the Court, has improperly invoked the Adult Abuse Act to achieve a collateral advantage and silence a whistleblower.

II. SUMMARY OF ARGUMENT

Dismissal is warranted based on the following three pillars:

- **Violation of Rule 4-3.3(d) (Duty of Candor):** Petitioner knowingly deprived this Court of material facts during the ex parte proceeding, specifically an active OCDC disciplinary investigation (File #25-2531-X) in which Respondent is the complainant. Had this been disclosed, the retaliatory nature of the filing would have been self-evident.
- **Objective Physical Impossibility:** Under RSMo § 455.035, an order requires "immediate and present danger." Respondent is a 64-year-old disabled individual with a spinal cord injury, residing in a supervised care facility 95 miles away from Petitioner. Respondent has no vehicle and no driver's license. Physical harm is a logistical and biological impossibility.
- **Statutory Exclusion for Legitimate Conduct:** Petitioner's allegations stem from Respondent's constitutionally protected consumer advocacy and citizen journalism. Under RSMo § 455.010, conduct that serves a "legitimate purpose" is expressly excluded from the definition of harassment or stalking.

III. CONCLUSION

The Petitioner is attempting to use this Court to effectuate a prior restraint on speech and avoid the rigorous standards of a defamation tort. The Adult Abuse Act was designed to prevent violence, not to serve as a low-cost "Anti-SLAPP" workaround for attorneys facing regulatory

scrutiny. Respondent respectfully requests that the Court dissolve the ex parte order and dismiss the Petition with prejudice.

Dated: May 5, 2026

Respectfully submitted,

/s/ Albert B. Pepper

Albert B. Pepper Jr. Respondent pro se
c/o Crawford Residential Care
2200 Varvera Rd.
Doe Run, MO 63637
Phone: 314-580-1684

Email: litigant.pro.se.advocate@gmail.com

IN THE 11TH JUDICIAL CIRCUIT COURT OF ST. CHARLES COUNTY, MISSOURI

ANTHONY R. FRIEDMAN, Petitioner,

v.

ALBERT B. PEPPER, Respondent.

Case No.: 2611-PN00554

RESPONDENT'S MOTION TO DISMISS PETITION FOR ORDER OF PROTECTION WITH PREJUDICE, OR IN THE ALTERNATIVE, MOTION FOR CONTINUANCE

COMES NOW Respondent, Albert B. Pepper Jr., and respectfully moves this Court to dismiss the Petition for Order of Protection with prejudice. In the alternative, if the Court declines to grant dismissal, Respondent moves for a continuance (20 days). In support thereof, Respondent states as follows:

I. THE PETITION SHOULD BE DISMISSED BECAUSE PETITIONER VIOLATED RULE 4-3.3(d) BY OMITTING MATERIAL ADVERSE FACTS IN THE EX PARTE PROCEEDING.

Missouri Rule of Professional Conduct 4-3.3(d) mandates that: “In an ex parte proceeding, a lawyer shall inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision, whether or not the facts are adverse.”

In this matter, Petitioner—a licensed attorney—knowingly deprived the Court of material facts essential to determining whether an “emergency” or “immediate and present danger” existed.

Specifically:

1. Motive of Retaliation: Petitioner failed to disclose that Respondent is the complainant in an active OCDC investigation against him opened Feb. 17, 2026. (File #25-2531-X). see: exhibit - 1
2. Pending Civil Litigation: Petitioner failed to disclose the Spoliation Demand/Notice of forthcoming malpractice tort delivered to him on Oct. 16, 2025. see: exhibit - 2, 2a
3. Prior Administrative Rejections: Petitioner failed to disclose the disposition of two prior law enforcement agencies, The St. Louis Metropolitan Police Department followed by The St. Charles County Police Department. Both agencies reviewed these identical allegations in early 2025 and declined to find a basis for charges. see: exhibit - 3, 3a, 3b, 3c, 3d
4. Physical Impossibility: Petitioner failed to disclose Respondent’s severe physical limitations and the 95-mile geographic separation, which render the claim of “immediate and present danger” a physical impossibility. see: exhibit - 4

Because Petitioner breached his professional duty of candor, the Court was induced to issue an Order based on material omissions and false premises. Had these adverse facts been disclosed as required by Rule 4-3.3(d), this Court would have recognized the Petition as a retaliatory business dispute having no basis in fact rather than a safety emergency. Therefore, the Petition should be dismissed with prejudice.

II. THE PETITION SHOULD BE DISMISSED BECAUSE NO IMMEDIATE AND PRESENT DANGER EXISTS (RSMo § 455.035)

A. Physical Impossibility of Any Threat

Respondent is 64 years old and suffers from a spinal cord injury.

Respondent ambulates only with the assistance of a cane. Walking even short distances causes significant fatigue.

Respondent resides in a supervised residential care facility on a 500-acre cattle ranch in Doe Run, Missouri (zip 63637), approximately 95 miles from Petitioner's location in St. Charles County. see: exhibit - 4

Respondent has no vehicle and no valid driver's license.

Respondent has not been physically present in St. Charles County for approximately eight years.

Respondent only leaves the facility on rare occasions, and only with his parents or under facility staff supervision, with all such outings limited to St. Francois County.

Respondent does not own any firearm or weapon of any kind.

Petitioner affirmatively misrepresented to the Court that Respondent carries, owns or has access to a weapon or firearm by checking the corresponding box on the Petition, with no supporting facts or evidence provided.

Petitioner knew these facts (at minimum points 1,2,3,4,8) at the time of filing. These facts are independently corroborated by:

- Letter/Affidavit from Dennis Crawford, Owner/Licensed Nursing Home Administrator, Crawford Ranch Residential Care, who observes Respondent's conduct, behavior, and state of mind daily. (Three years residency, strict no drug, alcohol, firearms policy, no violent episodes) see: exhibit - 5
- Character witness Jennifer Cook, Certified Med Technician [and Licensed Phlebotomist], who also observes Respondent's conduct, behavior, and state of mind daily. Ms. Cook will be appearing at hearing and trial to render character witness testimony.

B. Stale Evidence and No Recent Trigger

1. Petitioner alleges an “ongoing issue” beginning in spring 2024. The timeline is not in dispute. However, the alleged “ongoing issue” ceased in March/April 2025 following Respondent's commitment to law enforcement “Cease and Desist” instructions. see: exhibit - 3, 3a, 3b, 3c, 3d
2. Petitioner's submitted exhibits contain no identifiable recent trigger or new incident in April 2026 that would suggest a threat of bodily harm. Instead, the exhibits reveal a clear retaliatory motive for seeking an emergency ex parte order with “additional relief sought” to deplatform Respondent's consumer advocacy, citizen journalism. see: Petitioners

exhibit A re-numbered as Respondents exhibit - 6 , Academic, citizen journalist, consumer advocacy exhibits. see: exhibit - 7, 7a, 7b, 7c, 7d, 7e

3. A vast preponderance of the screenshots are four to twelve months old, with some dating back as much as two years. These screenshots constitute an aggregate lacking context—a recognizable “data dump” submitted to “overwhelm” the issuing court.
4. This stale evidence cannot support a finding of “immediate and present danger” under RSMo § 455.035. An ex parte order requires a showing of an immediate and present danger. Stale allegations regarding past conduct do not meet the jurisdictional threshold. See *Wallace v. Van Pelt*, 969 S.W.2d 380, 382 (Mo. App. W.D. 1998),

CONCLUSION TO II: The Petition should be dismissed because Petitioner failed to establish the statutory foundation for an actual immediate and present danger.

III. PETITIONER’S EVIDENCE LACKS CREDIBILITY AND FAILS TO ESTABLISH HARASSMENT OR STALKING

The screenshots submitted by Petitioner are unreliable because:

1. Many lack timestamps, metadata, URLs, or any proper chain of custody.
2. Prominent screenshots appear manipulated, altered, or negligently captured.
3. The vast preponderance are irrelevant or benign.
4. Even assuming authenticity, the screenshots constitute constitutionally protected citizen journalism and consumer advocacy regarding Petitioner’s professional conduct.

Such activity is expressly excluded from the definitions of “harassment” and “stalking” under RSMo § 455.010, which require a course of conduct that “serves no legitimate purpose.”

Respondent’s activities in professional accountability and consumer advocacy serve a clear

legitimate purpose and are therefore statutorily excluded. See *George v. McLuckie*, 227 S.W.3d 503 (Mo. App. W.D. 2007).

IV. PROCEDURAL NOTICE FOR HEARING

Should this matter proceed to hearing on May 13, 2026 or thereafter:

1. Respondent will not consent to any order and will require a full evidentiary hearing.
2. Respondent requests that Petitioner be ordered to provide clear, unredacted, and timestamped copies of all intended exhibits no later than 48 hours prior to the hearing to ensure judicial economy and prevent trial by ambush. In the alternative, request a brief recess to conduct examination of Petitioner's screenshots to determine which, if any, can be properly authenticated and are relevant under Missouri Rules of Evidence Rule 901.
3. Respondent has no objection to addressing the substance of any properly authenticated and relevant evidence and requests the recess solely for judicial economy and to omit evidence that has been presented for a collateral purpose.

V. ALTERNATIVE MOTION FOR CONTINUANCE

In the alternative, should the Court decline to dismiss the Petition, Respondent moves for a continuance of twenty (20) days. Grounds include:

1. The need to obtain official disposition reports from the 2025 St. Louis Metropolitan Police and St. Charles County Police complaints based on the same allegations.
2. The need to make necessary travel and transportation arrangements due to Respondent's disability and supervised residential care facility residency.
3. Coordinate the schedule of character witness Jennifer Cook with her employment obligations.

4. Respondent renders all assurances that he will continue to fully abide by the existing ex parte Order of Protection during any continuance period.

VI. AFFIRMATIVE DEFENSES

1. Respondent's documented physical disabilities and extreme geographical distance (95 miles) render the Petitioner's allegation of 'immediate and present danger' objectively unreasonable. No reasonable person could find a credible threat of imminent physical harm under these conditions, as such harm is a physical impossibility.
2. Similar allegations were previously investigated by law enforcement in 2025 with no charges filed.
3. Respondent's conduct for which Petitioner is seeking relief constitutes constitutionally protected activity under the First Amendment, Article I, Section 8 of the Missouri Constitution, and RSMo § 455.010, and cannot support a finding of harassment or stalking.
4. "During Petitioner's tenure at the Simon Law Firm P.C., and concurrent with his representation of the Respondent, said firm utilized its significant marketing

INDEX OF EXHIBITS / EXPLANATORY

1. Notice from Office of Chief Disciplinary Counsel | Date Feb. 17, 2026 | Open investigation of Anthony R. Friedman Attorney - Photograph
2. Spoliation Letter; Notice to Preserve Evidence sent via. U.S.P.S. / Email to Anthony R. Friedman d/b/a/ Friedman Law Firm LLC | 2, 2a
3. Cease and Desist Demand From Law Enforcement St. Louis / St. Charles County and Respondent's assurances of compliance. | 3, 3a, 3b. 3c, 3d

4. Screenshot - Google Maps Indicating location of Crawford Ranch Boarding Home (Residence) and 95 mile distance to St. Charles County Mo.
 5. Hand written letter per Dennis Crawford - Owner / L.N.H.A. Crawford Ranch Boarding Home | Three year residence, No Gun Policy, No history of presentation of violence.
 6. Petitioners Exhibit - A for additional relief citing social media content.
 7. Screenshots - Respondent's Journalistic Credentials, about page from three web domains hosted by the Respondent, Academia Edu profile, Scribd profile | 7, 7a, 7b, 7c, 7d, 7e
 8. Report to St. Charles County Planning and Zoning of Petitioner's code violation not having the requisite Home Occupation Permit. | 8. 8a
-

LIST OF AUTHORITIES

Missouri Statutes

- RSMo § 455.010: Definitions of "Harassment" and "Stalking"; exclusions for conduct serving a legitimate purpose.
- RSMo § 455.035: Requirements for issuance of an ex parte order; "Immediate and present danger" threshold.
- RSMo § 455.040: Provisions for full hearings and the burden of proof.

Missouri Court Rules

- Missouri Supreme Court Rule 4-3.3(d): Candor Toward the Tribunal in ex parte proceedings.
- Missouri Supreme Court Rule 55.03: Signatures and Sanctions for bad faith or improper filings.
- Missouri Rules of Evidence Rule 901: Authenticating or Identifying Evidence.

Missouri Case Law

- George v. McLuckie, 227 S.W.3d 503 (Mo. App. W.D. 2007): Addressing the "legitimate purpose" requirement in harassment claims.

- *Overcast v. Billings*, 752 S.W.2d 87 (Mo. App. E.D. 1988): Regarding prior restraint and the use of injunctions in defamation contexts.
 - *Precision Investments, LLC v. Mistele*, 498 S.W.3d 100 (Mo. App. W.D. 2016): Application of the Clean Hands Doctrine in equitable relief.
 - *Wallace v. Van Pelt*, 969 S.W.2d 380 (Mo. App. W.D. 1998): Warning against the "light invocation" of the Adult Abuse Act and its misuse as a substitute for civil torts.
-

Exhibit (1)

In January 2026, Respondent posted a video on Facebook depicting a car bombing and included my name in the caption. This post was sufficiently concerning that the CEO of the Bar Association of Metropolitan St. Louis contacted me directly to report it. This and similar posts caused me to fear for my physical safety.

Respondent has also posted content referencing violence, death, and destruction, including imagery and statements involving weapons, attacks, and harm directed at me and my family. Respondent has published my home address along with threatening and violent imagery, including antisemitic and racist content. As a result, I have been forced to install security measures at my home and remain concerned for my safety and the safety of my family. Respondent's conduct serves no legitimate purpose. It is intentional, targeted, repeated, and ongoing. It has caused substantial emotional distress and has placed me in fear of physical harm. The conduct has not stopped and has recently escalated, and I believe it will continue without court intervention.

I am afraid of Respondent and believe there is an immediate and present danger to my safety. Petitioner is aware that Respondent has engaged in similar conduct toward other individuals, including attorneys firms St. Louis, reflecting a broader pattern.

See attached:

Exhibit B - Selected Threatening Posts

Exhibit C - Selected Posts Just From Today (April 9, 2026)

Exhibit D - BAMSL Email (Jan. 6, 2026)

Exhibit E - Sample Online Posts / Harassment Campaign Evidence

Exhibit F - Harassing Emails (Spring 2024-April 2025)

Attach additional pages, if needed.

- I am afraid of Respondent.
- There is an immediate and present danger of domestic violence to me.
- There are other good reasons for an emergency temporary order of protection because

Respondent's conduct is ongoing, occurs daily, and has escalated to include violent and threatening content directed at Petitioner, including posts depicting acts of violence referencing Petitioner by name. Petitioner fears for his physical safety, and the conduct continues without interruption.

- I have photographs, text messages, phone messages, or other evidence of my abuse.

Exhibit (2, 2a)

Spoliation Letter: Notice to Preserve Evidence

- See: Academia Edu / URL:
https://www.academia.edu/145578426/Spoliation_Letter_Notice_to_Preserve_Evidence

Exhibit (3, 3a, 3b, 3c, 3d, See Also: Academia Edu:
https://www.academia.edu/164672752/He_tried_to_weaponize_law_enforcement_to_silence_me_Anthony_R_Friedman_Mo_Bar_65531



Mon, Apr 28,
2025, 1:28 PM

Hooks, Jeffrey V.
<jvhooks@slmpd.org>

to me,
jewelryimporters
@yahoo.com,
roma011660@g
mail.com,
mcdanielsdylan4
35@gmail.com,
romacheathamis
@gmail.com,
janeschusterjap
@yahoo.com,
litigant.pro.se.ad
vocate@gmail.c

om 

Mr. Albert Pepper,

This email is a notification for you to stop communicating with Anthony Friedman, his law firm, employees, staff, contractors, and any persons associated with him or his law firm. This shall include communication via another party or through a proxy. This is now the second time you have been notified about harassing postings and communications relative to your court case. That being said, it is also a notice that no other parties to the case should be contacted.

While it is understood that you have a grievance regarding your court case, you should make all correspondence through the proper channels of legal process in the court. This shall only be done through the court using the appropriate mechanisms afforded to you.

Any communication outside of the proper legal process will be considered for criminal charges. These communications are harassing and cause affected parties to fear for their safety.

If you wish to discuss this further, please feel free to email me with a telephone number where I can contact you.

Respectfully,

Detective Jeffrey Hooks, DSN 6884

St. Louis Metropolitan Police Department

1915 Olive Street, St. Louis, MO 63103

CONFIDENTIALITY NOTICE:

This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information or may otherwise be protected by law. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please get in touch with the sender by reply e-mail and destroy all copies of the original message and any attachments to it.



Tue, Apr 29,
2025, 9:53 AM

Alberto Pepperoni
<gpckings@gmail.com>

to Jeffrey 

Subject: Response to Your Notice Regarding Communication with Anthony Friedman

Dear Detective Hooks,

Thank you for the notice and advisory that I did indeed receive via email. I consider the request to cease and desist and the warning to have substantial credibility. Though I do not make any admissions to the allegations, you may be quite assured that as of the date of this email forward, I will be found in compliance with what you suggest. I would at this time however, make a few statements to clarify for the record and to preserve my right to gather testimony and prima facie evidence in support of my grievance.

In your first email notice that you had sent me dated August 5, 2024, the language was specific in that it stated: "This email is a notification for you to stop communicating with The Simon Law Firm, P.C., its employees, staff, contractors, and any persons associated with the law firm. This shall include communication via another party or through a proxy." I trust that since my receipt of that notice and to date, I have been found in compliance with your admonishment. However, the matter of The Friedman Law Firm is a separate and independent issue, whereas Anthony R. Friedman dba The Friedman Law Firm LLC is not an associate of The Simon Law Firm, P.C., and therefore, up until the receipt of this email naming Anthony R. Friedman dba The Friedman Law Firm LLC, I was at liberty to communicate therewith. You may be quite assured as well, that as of the date of this second email forward, I will be found in compliance with what you suggest.

With regard to the language contained in this second email. With all due respect, (whereas I hold law enforcement in the highest esteem and view your profession with great admiration,) the restriction(s) upon communication are overly broad. Specifically: "it is also a notice that no other parties to the case should be contacted." Detective Hooks, the first part of your demand is reasonable, and you have my full cooperation. However, this latter part that I have cited may prohibit me from gathering evidence and testimony in support of a forthcoming O.C.D.C. complaint and tort complaint. Examples would be third parties who have knowledge and testimony with regard to the grievance, i.e., former professional associates, expert witnesses, and third-party mediators that were a part of the case. Therefore, I wish to assert my right in so doing. If you wish to add any other names or parties to your advisory to narrow the scope, I am more than happy to receive it.

With regard to proper channels of communication, I acknowledge that any communication directed toward the named parties, either primarily or through third parties or proxies, is prohibited. However, though it is not specifically addressed, I wish to preserve and assert my right to publish any criticisms or grievances in a public forum, e.g., website establishment and maintenance, social media posts, or third-party organizations or individuals that may have an interest in this matter. Examples may be web hosting services, online invitations for consumer comments, social media profiles, news outlets, and other forms of mass communication. In consideration thereof, I cannot be held liable if the parties mentioned inadvertently become aware of such information and as a result may cite it as a source of distress, whereas such venues are protected under a First Amendment right.

Det. Hooks, I would like to treat and give rebuttal to certain elements of the purported offenses contained within this notice and that of which may be most alarming and would certainly warrant an investigation. Specifically, the following line: "These communications are harassing and cause affected parties to fear for their safety." Now, with regard to "harassing". Perhaps, it may be plausible, though I do not make any admissions, that Friedman may have some distress, from exactly what source however, and to the degree is yet unknown. With regard to "parties to fear for their safety." Det. Hooks, if this is a bona fide concern of that the complainant expressed, the claim is absolutely outrageous and entirely implausible. Allow me to put this allegation in its proper context. I, the respondent, am a sixty-three year old male who is crippled with a spinal cord injury and ambulates with a cane. The last seven years of my life I have resided in a residential care facility and the total sum of my monthly income of \$950 is deposited directly into the account of the host facility. I have no assets, no mode of transportation, no capacity to come in contact with anyone who may have expressed such concerns nor do I have the financial resources to engage in such activity. And Friedman knows this. I would suggest that this allegation is an attempt on the part of the complainant to incite law enforcement to react to an erroneous and implausible threat of bodily harm.

Because I have respect for you Det. Hook, your profession and your credentials I am willing to comply with your demand as a show of deference and to mitigate any purported offense and my word is a good surety. I do however, take into consideration that unless you are working in cooperation with law enforcement in St. Charles County, I would suggest that charges and prosecution of such a case are without the jurisdiction of the Saint Louis Metropolitan Police Dept. The purported offense is upon Anthony R. Friedman who resides and whose business address is in St. Charles County. I, the respondent, live neither in St. Charles County nor in the City of St. Louis, Missouri. If I am in error of my assessment as to jurisdiction please advise. Friedman knows that the original notice dealing with The Simon Law Firm P.C. has substantial, enforceable credibility whereas they are indeed located in the City of St. Louis. However, I would suggest that Friedman is attempting to "piggyback" on the original notice and complaint to enhance the egregiousness of the purported offense. The connection is tangential at best. Friedman knows this.

Furthermore, as a result of this new complaint being addressed by the St. Louis

Metropolitan Police Dept., you doing the investigation specifically and other elements contained therein from the previous issue, that it is evident that Anthony R. Friedman and The Simon Law Firm P.C. have colluded and have shared the contents of the privileged information and correspondences between the Simon Law Firm P.C., The St. Louis Metropolitan Police Dept. and myself, in violation of the confidentiality notice at the bottom of each of your correspondences with me. Anthony R. Friedman Left The Simon Law Firm on June 30,2023 fourteen months before your first notice to me dated Aug. 5, 2024 and was not a part nor party to that notice and therefore would have had no knowledge of the complaint, nor the contents, nor the resolution had it not been shared.

I suppose it is incumbent upon you to advise Friedman as to the status of his complaint and allegations. I would suggest that it may be prudent to advise him that I have reserved to myself a few elements of a factual nature that should Friedman decide to escalate the matter I will present them at a most propitious time that may effectively neutralize the threat. In fact, Friedman may himself be found caught up in the snare which he has laid.

In conclusion: You have my full cooperation with regard to any direct or indirect communication with the complainant. With regard to any threat to bodily harm, it is not even within the realm of possibility though, as a statement with regard to commitment, I pledge not to engage in any act(s) that may be construed as doing so. Neither will I even conceive of such.

Respectfully,

Albert Pepper - respondent

"Nothing but truth and verity shall ever proceed forth from my lips whereas, my presentation shall remain impeccable and my testimony unimpeachable as I bear every disparaging lash of the examiners scourge." ~ Albert Pepper



Tue, May 13,
2025, 1:21 PM

Knobbe, Kevin
<KKnobbe@sccmo.org>

to me,
jewelryimporters
@yahoo.com,
roma011660@g
mail.com,
mcdanielsdylan
435@gmail.com,
romacheathami
s@gmail.com,
janeschusterjap
@yahoo.com,
litigant.pro.se.ad
vocate@gmail.c
om

Mr. Albert Pepper,

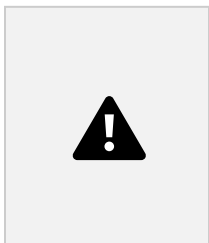
A police report has been filed with the St. Charles County Police Department by Mr. Anthony Friedman in regards to Harassment by you. I am sending you this email as a notification for you to stop communicating with Anthony Friedman, his law firm, employees, staff and any persons associated with him or his law firm. This shall include communication via another party or through a proxy. You have been previously notified about harassing postings and communications relative to your court case. That being said, it is also a notice that no other parties to the case should be contacted.

While it is understood that you have a grievance regarding your court case, you should make all correspondence through the proper channels of legal process in the court. This shall only be done through the court using the appropriate mechanisms afforded to you.

Any communication outside of the proper legal process will be considered for criminal charges. These communications are harassing and cause affected parties to fear for their safety.

Please cease and desist any further communication with Anthony Friedman.

Respectfully,



Kevin Knobbe

Detective

St. Charles County Police Department

101 Sheriff Dierker Court, O'Fallon, MO 63366

☎ 636-949-7900 ext. 4465 | ☎ 949-3009 | kknobbe@sccmo.org





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Tue, May 13,
2025, 3:50 PM

Alberto Pepperoni
<gpckings@gmail.com>

to Kevin 

Dear Det. Knobbe,

I am in receipt of your advisory and warning as of the time and date of this reply email and you

may be quite assured that I will be found in full compliance with your demand.

Furthermore, Det. Knobbe your advisory and warning is the second one that I have received with regard to Friedman and as of the date of the first one that I have received I have been in compliance from that date forward. The first complaint by Friedman was filed with the Metropolitan St. Louis Police Department of which I had received on Monday April 28, 2025. I have copied, pasted the original advisory, warning from the STLMPD and my response for your review under the postscript and extended to you the same assurances with regard to compliance. I will at this time forgo commentary as to Friedmans motive and/or modus operandi.

If there is anything further you would wish to add to your advisory and warning for my attention I am more than happy to receive it.

Sincerely,

Albert Pepper

Exhibit (4)

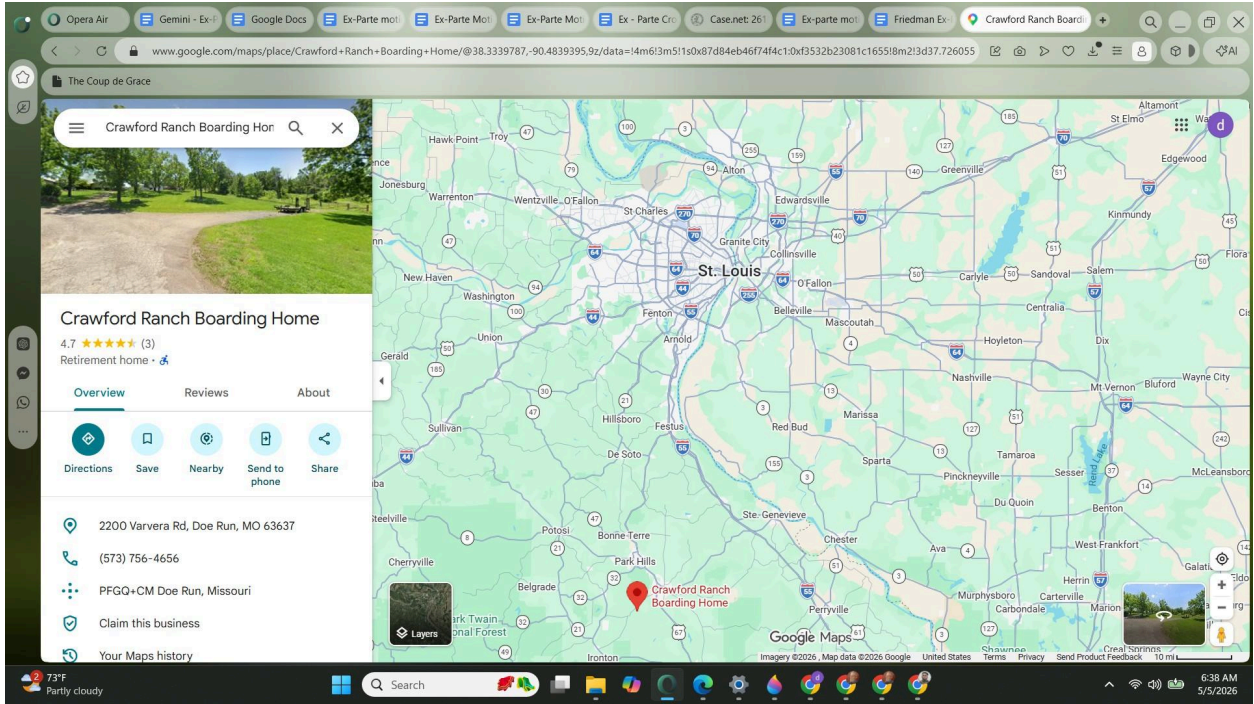


Exhibit (5)

Crawford Ranch Boarding Home, LLC
2200 Varven Road
Doe Run, MO. 63637

Al Peper has been a consumer living in our RCF. The RCF has very strict guidelines of being Free of drugs, Alcohol, and any Firearms. Al has never had any violent episodes requiring any mental health assessments or any type of hospitalization. Al has lived at Ranch for 3 years.

Denis Crawford
Adm. Crawford Ranch
Busi # 573-756-4656
Cell # 573-631-1684

Exhibit (6)

Exhibit A
Additional Requested Relief

Respondent shall not post, publish, distribute, or cause to be posted any content referencing Petitioner that is harassing, threatening, intimidating, or intended to cause Petitioner substantial emotional distress or fear of physical harm.

Respondent shall not create, maintain, or use any website, social media account, email account, or online profile that impersonates Petitioner or is designed to appear as Petitioner or Petitioner's business.

Respondent shall not publish, post, or distribute Petitioner's personal identifying information, including home address or information relating to Petitioner's family, where such conduct is intended to harass, intimidate, or threaten Petitioner.

Respondent shall not contact, communicate with, or direct any communication toward Petitioner's clients, neighbors, family members, or professional contacts for the purpose of harassing, intimidating, or interfering with Petitioner.

Respondent shall remove any online content under his control that is harassing, threatening, or that impersonates Petitioner.

Respondent shall not use third parties, aliases, or alternate accounts to engage in any conduct prohibited by this Order.

Respondent shall not engage in any course of conduct, including online activity, that is intended to harass, threaten, intimidate, or place Petitioner in fear of physical harm or substantial emotional distress.

Exhibit (7, 7a, 7b, 7c, 7d, 7e)



Hi Albert [Profile](#) [Renew](#) [Sign out](#)

Your Membership

Membership

Member #: 100088792

Membership Region: Region 7

Membership Type: Retired Membership (1 year)

Member Since: March 7, 2026

Membership Expires/Renews: March 31, 2027

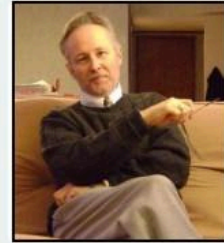
[Access membership benefits](#)

[Reset your password](#)

[Printable membership ID card \[PDF\]](#)

Events Open for Registration

- [SPJ26 Convention](#)



Update Profile Picture (JPG, GIF, PNG formats only, Max size: 250 KB)

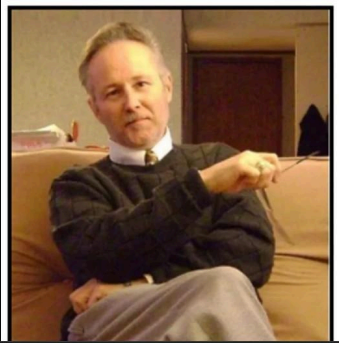
| No file chosen

[Update Profile](#)

notthefriedmanlawfirmsaintcharles.com/about-1

HOME ABOUT CONSUMER RESOURCES PERSONAL INJURY CLAIM CLIENT RIGHTS LAW DICTIONARY ARTIFICIAL INTELLIGENCE MORE

Personal Injury Law Advocacy: Meet the Creator and Curator



Mission and Prologue

Ladies and gentlemen if you have found this page you are off to a most wonderful educational adventure into the world of personal injury law .

This site has been established for the purpose of consumer awareness and consumer advocacy for those who have been injured and are now seeking or have already retained counsel to obtain compensation.

What you may find most intriguing about this site is that I, a plaintiff litigant in a medical malpractice complaint that lasted four years is going to unpack all of the elements of the case beginning with the retaining of an attorney to the conclusion of the matter. This will be a "case study" of how the events unfolded so that you may become


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SHOUT IT OUT LOUD

Shout It Out Loud: Empowering the Juris Marginalized



About the Author: Albert B. Pepper Jr. Pro Se Litigant | Citizen Journalist | Consumer Advocate

Albert B. Pepper Jr. is not your average legal commentator. He is the "Franken-Client"—the embodiment of the informed, technologically savvy, and meticulously documented litigant that modern law professors warn their students about. Albert has experienced first hand after being represented by legal counsel for five years in a medical malpractice complaint the exploitation of counsel per the imbalance in attorney / client power dynamics and the grievous disadvantage that a consumer, a member of the general public realizes when negligent, incompetent and perhaps even hostile legal counsel causes injury to their client and quite often with impunity. - They know of the almost insurmountable struggle that an aggrieved client has to contend with in trying to get their voice to be heard and the struggle is real.

Based in the St. Louis metropolitan area and Columbia, Illinois, Albert's journey from a medical malpractice plaintiff to a high-impact consumer advocate was born out of necessity. After a five-year litigation battle in the case of *Pepper v. Gelland* (#19SL-CC04680), Albert witnessed firsthand the "mask of the Greek Sophist" crack within the legal profession. - Represented by a high profile law firm, The Simon Law Firm P.C. Pepper experienced multiple acts of nonfeasance, misfeasance, malfeasance and even a hostile mode of representation by the associate attorneys of The Simon Law Firm P.C.

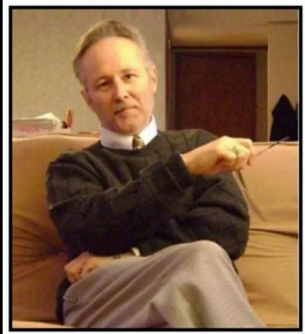
Pepper has now taken his grievance and the injury he realized at the hands of counsel and has transformed

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PHOENIX RISING PRODUCTIONS LLC

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Welcome to Phoenix Rising Productions LLC!



About : Albert B. Pepper Jr.

Pro Se Litigant | SPJ Journalist | Consumer Advocate

Albert B. Pepper Jr. is the founder of Phoenix Rising Productions LLC and the investigative force behind consumer advocacy platforms such as **Shout It Out Loud** and **Jury-Watch**. Based in the St. Louis area, Albert has transformed a decade of personal legal and medical challenges into a public-interest mission to hold the "Juris-Aristocracy" accountable through transparent, evidence-based reporting.

Journalistic Integrity & Professional Standards

As a member in good standing of the Society of Professional Journalists (SPJ), Albert approaches his advocacy with the mindset of a seasoned investigator. His investigative exposés are committed to **factual and verifiable rigor**, adhering to the ethical pillars of seeking the truth and providing a fair accounting of the facts. In an era of misinformation, Albert's work stands as a bulwark for the "Juris-Marginalized," ensuring that every claim of legal or medical malfeasance is backed by a meticulous paper trail.

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Albert B Pepper

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We present a detailed annotated transcript of a pivotal phone call between Albert B. Pepper Jr. and Elizabeth C. McNulty, a.k.a. "Net-Zero McNulty" Successor Malfeasor revealing strategic decisions made just before a medical mal... see more

Pre Trial January 4, 2024 Phone Call between Albert B. Pepper Jr. and Elizabeth C. McNulty (Simon Law Firm)
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Albert B. Pepper Jr.

Albert B. Pepper Jr. litigant pro se is a consumer advocate, citizen journalist with regard to civil torts and personal injury law, civil procedure and jurisprudence. The work is to provide resources for both pro se litigants and injured parties seeking legal representation. Albert B. Pepper Jr. was born and resides in Saint Louis, Missouri. Albert B. Pepper Jr. is the curator at the Sanctus Alberto Monasterium. Albert B. Pepper Jr. is a member in good standing of The Society of Professional Journalists and subscribes to the code of ethics for professional conduct. <https://go.spj.org/member-profile.php> Affiliate and further content - <https://shoutitoutloud.org/about> <https://independent.academia.edu/Jonesbing> <https://notthefriedmanlawfirmsaintcharles.com/about-1> [view less](#)

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Exhibit (8, 8a)



Alberto Pepperoni
<gpckings@gmail.com>

Fri, May 16, 2025,
11:59 AM

to
planningandzon
ing

St. Charles County Planning and Zoning Division 201 N. Second St., Suite 412 St. Charles, MO 63301 Email: planningandzoning@sccmo.org

Subject: Complaint Regarding Violation of Section 405.495, Unified Development Ordinance – Home Occupation Permit at 1147 Tower Park Dr., St. Charles, MO 63304

Dear Planning and Zoning Division,

I am filing a formal complaint regarding an alleged violation of Section 405.495 of the St. Charles County Unified Development Ordinance (UDO) by Anthony R. Friedman, dba. The Friedman Law Firm LLC, at the residential address of 1147 Tower Park Dr., St. Charles, MO 63304. The violation concerns the operation of a law practice without applying for or obtaining a required Home Occupation Permit.

Facts of the Complaint:

1. Business Address Listings:

- Anthony R. Friedman lists 6209 Mid Rivers Mall Dr., Ste. 204, St. Charles, MO 63304, as an address for The Friedman Law Firm LLC. This address is a post office box at a UPS Store in Dierbergs Markets - 94 Crossing. It lacks the infrastructure (e.g., office space, computers, filing systems, personnel) necessary to operate a law firm, suggesting it is not the primary place of business. [See Exhibits 1,]
- The residential address, 1147 Tower Park Dr., St. Charles, MO 63304, located in the Reserve at Lakeview Farms development, is also listed as an address for the law practice and listed as primary in legal and business filings. [See Exhibits 2, 3, 4,]

2. Confirmation of No Home Occupation Permit:

- On April 29, 2025, I contacted the St. Charles County Planning and Zoning Division and spoke with “Mr.” Jared, who confirmed that, as of that date, no individual or entity at 1147 Tower Park Dr. had applied for or been issued a Home Occupation Permit. [See Exhibits 5, 6,]

3. Evidence of Law Practice at Residential Address:

- Legal and court correspondence filed with the St. Charles County 11th Circuit Court Division, lists 1147 Tower Park Dr. as the address for The Friedman Law Firm LLC. This indicates that the law practice is being conducted from the residential property. [See Exhibits 7, 8, 9]

Basis for Complaint:Section 405.495 of the UDO requires a Home Occupation Permit for any business activity conducted in a residential dwelling unit, subject to specific conditions (e.g., no external evidence of the business, limited traffic, and compliance with zoning regulations). The evidence suggests that Mr. Friedman is operating a law practice from his residence without the requisite permit, constituting an ongoing violation of the UDO. This activity may impact the

residential character of the Reserve at Lakeview Farms development and warrants investigation to ensure compliance.

Requested Action:I respectfully request that the Planning and Zoning Division:

1. Investigate the alleged violation at 1147 Tower Park Dr. to confirm whether a law practice is being conducted without a Home Occupation Permit.
2. Take appropriate enforcement actions, as outlined in Section 405.645 and Section 405.650 of the UDO, to remedy the violation, including issuing a written order to cease the unpermitted use or requiring compliance through a permit application.
3. Keep me informed of the investigation's progress, any enforcement actions taken, and the resolution of this matter.

Exhibits:

- Exhibit 1: [Description, Screenshot of The Friedman Law Firm LLC website listing 6209 Mid Rivers Mall Dr. as address and that of a UPS Store]
- Exhibit 2: [Description, Screenshot of Missouri Secretary of State business filing listing address at 1147 Tower Park Dr.]
- Exhibit 3: [Description, Screenshot of Missouri Secretary of State articles of organization listing address at 1147 Tower Park Dr.]
- Exhibit 4: [Description, Annual filing with the ARDC Supreme Court of the State of Illinois listing address at 1147 Tower Park Dr.]
- Exhibit 5: [Description, Screenshot of minutes kept with regard to planning and zoning home occupation permit inquiry with "Jared"]
- Exhibit 6: [Description, Word document of minutes kept with regard to planning and zoning home occupation permit inquiry with "Jared"]
- Exhibit 7: [Description, Screenshot of court filing with St. Charles County 11th circuit dated April 28, 2024 listing address as 1147 Tower Park Dr.]
- Exhibit 8: [Description, Screenshot of court filing with St. Charles County 11th circuit dated June 4, 2024 listing address as 1147 Tower Park Dr.]
- Exhibit 9: [Description, Screenshot of certified, registered mail with the St. Charles County 11th circuit listing address as 1147 Tower Park Dr.]

Please contact me at 314-580-1684 or email; gpckings@gmail.com for any additional information you may require. Furthermore, please keep me apprised as to the status and final disposition of the complaint and investigation. Thank you for your attention to this matter.

Respectfully submitted,

Albert B. Pepper

9 Attachments • Scanned by Gmail