Formal Report / Request for Investigation

Michelle L. Walker d/b/a STL Buy & Sell Realtors LLC

To:
Ethics Committee / Professional Standards Committee - St. Charles Realtors

From:
Albert B. Pepper Jr.
2200 Varvera Rd.
Doe Run, Mo. 63637

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

Phone: (314) 580-1684

Date: October 30, 2026

Re: Request for Investigation – Alleged Review Manipulation and Potential Violations of the NAR Code of Ethics by Michelle L. Walker, Broker/Owner, STL Buy & Sell, REALTORS® (STL Buy & Sell LLC, MREC License #2008004173)

Dear Members of the Ethics/Professional Standards Committee:

I am writing to formally request an investigation into the public review practices associated with Michelle L. Walker, Broker/Owner of STL Buy & Sell, REALTORS® (3829 Veterans Memorial Pkwy, St. Peters, MO 63376), and the firm's Google Business Profile.

Publicly available information and cross-referenced licensing data raise substantial concerns that a material portion of the firm's five-star Google reviews do not represent independent, arms-length consumer experiences. Instead, a significant number appear to originate from licensed real estate professionals, firm affiliates, family members, and personal acquaintances. This creates an artificially inflated public rating that may mislead consumers and distort fair competition.

Summary of Concerns

Licensee and Industry Peer Reviews

1. Independent forensic audits of the Google Business Profile have identified multiple five-star reviews posted by individuals holding active Missouri real estate salesperson or broker licenses. Documented examples include (but are not limited to):

    - Tami Miller (aka Tami Kramer), MREC #2016042526 – Camdyn Properties LLC
    - Walter Walker III, MREC #2004031128 – affiliated with Michelle Lyn Walker
    - Turon A. Blevins, MREC #2004003934 – STL Buy & Sell LLC
    - Killian McEvoy (aka Shannon Patrick McEvoy), MREC #1999084284 – NRT Missouri / Coldwell Banker
    - Kurt Garrett (aka Paula K. Garrett), MREC #1999144107 – Pro 100 Inc.
    - Kristie Renee Weber, MREC #2002011342 – eXp Realty LLC
    - Harry A. Daw, MREC #2015021555 – Daw Realty Group LLC
    - Ryan Riege, MREC #2007026040 – STL Buy & Sell LLC
    - Kristin Gansman, MREC #2012034678 – STL Buy & Sell LLC
    - Additional confirmed licensees (John Wesley Becker, Matthew John Becker, Ethan Eric Miller, Michael Rome, and others)

2. Audits place the portion of five-star reviews attributable to active licensees at approximately 36 percent, with broader estimates of non-organic or conflicted engagement approaching 50 percent when accounting for undisclosed relationships.

Family and Personal Relationship Reviews (Recent "New" Cluster)

3. Within the most recent two-week period, multiple five-star reviews display clear personal ties:
    - **Yuri Walker** – Owner reply explicitly addresses the reviewer as "Aunt Yuri."
    - **Josh Turner** – Owner reply states "Family or not…"
    - **Travena Hostetler** – Owner reply emphasizes a personal "friendship that followed."
    - **Janet Stiglich** – Documented personal friend and former colleague of Michelle Walker on the Francis Howell R-3 School Board (overlapping service periods).

The review was posted approximately 1.5 years after any alleged representation in a home sale, an unusual delay for organic client feedback.

4. These reviews appeared in a tight temporal cluster and sit prominently among the newest content visible to the public.

Resulting Public Impression

5. The combination of licensee/peer reviews and undisclosed personal/family reviews produces a 4.4+ star baseline on the firm's Google Business Profile (a primary consumer discovery tool). Prospective buyers, sellers, and tenants are presented with an appearance of broad independent consumer satisfaction that does not fully reflect the composition of the reviews.

Potential Ethical and Regulatory Issues

The conduct described appears to implicate the following standards:

- **NAR Code of Ethics**
  - Article 12 (True Picture in Advertising and Representations)
  - Article 2 (Misrepresentation or Concealment of Pertinent Facts)
  - Article 15 (False or Misleading Statements; Fair Competition)
- **Missouri Real Estate Commission**
  - RSMo § 339.100 (untrustworthy, improper, or fraudulent business dealings; substantial misrepresentation)
  - 20 CSR 2250-8.070 (advertising transparency)
- **Google Business Profile Policies**
  Prohibitions on fake engagement and reviews from individuals with professional or personal conflicts of interest.
- **Missouri Merchandising Practices Act (RSMo § 407.020)**
  Potential concealment of material facts in the advertisement of real estate services.

Leadership Context and Institutional Impact

I note that Ms. Walker is scheduled to be installed this evening in a leadership capacity with the Women's Council of REALTORS® of St. Charles County (or the St. Charles REALTORS® women's leadership structure). Given that role's visibility and its implicit responsibility to uphold the highest standards of professional ethics and public trust, the concerns outlined in this letter take on added institutional significance for the association itself. The integrity of public consumer ratings and the association's commitment to ethical conduct are directly implicated

when a member elevated to a representative leadership position faces credible questions of this nature.

Concurrent Filings

Concurrently, formal complaints raising these same issues will be submitted in the coming days to the Missouri Real Estate Commission and the Missouri Attorney General's Office under the Merchandising Practices Act. I request that the St. Charles REALTORS® Ethics/Professional Standards process proceed independently and without delay.

Requested Action

I respectfully request that the Board:

1. Open a formal investigation into the review practices of Michelle L. Walker and STL Buy & Sell, REALTORS®;
2. Examine whether the posting or solicitation of reviews by licensees, employees, family members, and personal acquaintances, without disclosure of those relationships, violates the NAR Code of Ethics or local Board rules;
3. Determine whether any corrective action, education, or disciplinary measures are warranted; and
4. Advise me of the disposition of this matter to the extent permitted by confidentiality rules.

I am prepared to provide the full review thread, forensic audit, timestamps, owner replies, and publicly available licensing cross-references upon request. All information cited is drawn from publicly accessible Google Business Profile content and Missouri Division of Professional Registration records.

Thank you for your attention to this matter. Maintaining the integrity of public ratings is essential to consumer protection and to the reputation of the real estate profession in our community.

Respectfully submitted,

/s/ Albert B. Pepper Jr.
consumer advocate, litigant pro se d/b/a Phoenix Rising Productions LLC

Enclosures / Available Upon Request

- Screenshots and timestamps of the recent "New" review cluster
- Owner reply language acknowledging family and friendship relationships

- Public licensing data cross-references
- Summary of older negative consumer reviews for contrast