

STATE OF MISSOURI)
) SS
 COUNTY OF ST. LOUIS)

IN THE FAMILY COURT OF ST. LOUIS COUNTY
 DOMESTIC VIOLENCE COURT
 STATE OF MISSOURI

FILED

SEP 12 2022

JOAN M. GILMER
 CIRCUIT CLERK, ST. LOUIS COUNTY

Douglas Graham),
 Petitioner,),
),
 vs.),
),
Nicole Graham),
 Respondent.)

Cause No. 21SL-PN01769

MOTION TO HOLD RESPONDENT IN INDIRECT CRIMINAL CONTEMPT

Comes now the Chief Specially Appointed Court Attorney ("CSACA"), pursuant to Missouri Supreme Court Rule 36.01(b) and Section 455.090.2, R.S.Mo, and moves this court to hold a hearing and find Respondent guilty of committing certain intentional and willful acts (as pled below), all in violation of this court's full Order of Protection, issued on July 26, 20 21 (and extended on _____, 20 ____).

Accordingly, the CSACA moves for this court to hold Respondent in Indirect Criminal Contempt.

Having considered both the allegations in Petitioner's Motion and the entire court file, the CSACA alleges as follows:

1. On July 26, 20 21, this Court entered a Full Order of Protection (hereinafter "O/P") for Petitioner against Respondent, to last until July 25, 20 22. [On July 21, 20 22, Petitioner filed a Motion for Renewal of the Full Order of Protection, which remains pending before this Court.]
2. According to the provision(s) of the O/P, this Court ordered Respondent to refrain from:

☒ abusing and threatening to abuse Petitioner;

(More terms on next page.)

☒ communicating with Petitioner; the Full O/p was amended by consent on August 9, 2021 to allow communication between parties through Our Family Wizard solely regarding the minor child;

☒ harassing and stalking Petitioner;

☒ entering the premises of Petitioner's residence or employment and coming within 500 feet of Petitioner;

☐ interfering with the award of custody of the parties' children to Petitioner;

☐ _____

(Indicate any other special provisions not otherwise covered above, which were ordered by the Court when the O/P was entered.)

3. The O/P has at all times since its entry remained in full force and effect.
4. This Court retains jurisdiction over the O/P for its entire duration.
5. After Respondent was made aware of the O/P, he/she willfully and intentionally violated the terms of the O/P as follows:

A. COUNT ONE: During the Full Order of Protection, Respondent has repeatedly contacted Petitioner through email, phone, Our Family Wizard messages, and third parties. On April 16, 2022, Respondent also came within 500 feet of Petitioner and his residence, parking across the street from his home. Respondent later texted their minor son a picture of herself parked across the street from Petitioner's home.

B. COUNT TWO: On June 27, 2022, Respondent sent Petitioner an email request to connect through NextDoor.

C. COUNT THREE: In June and July of 2022, Petitioner received multiple communications from third parties, informing Petitioner that Respondent had tried to reach out to them through social media regarding Petitioner.

D. COUNT FOUR: On June 14, 2022, Respondent communicated with Petitioner through email, forwarding him a message she had received from another person, which did not involve or request communication with Petitioner.

E. COUNT FIVE: On June 14, 2022, Respondent sent Petitioner a message on Our Family Wizard that was not regarding their minor child, saying, "Happy Anniversary Douglas. May you have a nice day today."

☒ Additional counts are attached.

6. Respondent's above actions were done with a careless and imprudent disregard for the power and authority of this court.

7. The terms of the O/P are enforceable by all remedies available at law for the enforcement of a judgment. This Court may punish a respondent who willfully violates an O/P, to the same extent as provided by law for contempt of court. (Section 455.090, R.S.Mo.)

8. ☐ I am unaware of any proceedings in municipal or state court that relate to the prosecution of Respondent for the same violations of the O/P that I have described in paragraph 5 (above).

☐ I am aware of the following proceedings in municipal or state court that relate to the prosecution of Respondent for the same violations of the O/P that I have described in paragraph 5 (above): _____

9. The matters alleged above are true to my best information and belief.

WHEREFORE, the CSACA respectfully prays that this court issue an order citing Respondent for indirect criminal contempt; appoint an assistant special prosecuting attorney as co-counsel for future proceedings; set the matter for a hearing; find Respondent guilty of

violating this court's Full Order of Protection as described; and hold Respondent in Indirect Criminal Contempt.

Respectfully submitted,

Kimberly Bettsworth #42556
Chief Specially Appointed Court Attorney

8-17-2022
Date

ADDITIONAL COUNTS

F. COUNT SIX: On May 25, 2022, Respondent sent Petitioner a message on Our Family Wizard that was not regarding their minor child, discussing their relationship, including, "Now you are gone. How do I carry on?"

G. COUNT SEVEN: On May 25, 2022, Respondent sent Petitioner a message on Our Family Wizard that was not regarding their minor child, discussing their marriage and asking petitioner to talk to her.

H. COUNT EIGHT: On May 20, 2022, Respondent called Petitioner directly. Petitioner did not answer Respondent's phone call.

I. COUNT NINE: On April 1, 2022, Respondent sent an email directly to Petitioner, including many others, writing, "Ha! Shawn never even let Carson play with Brenden when we lived next door from him. Why would he care if my son's name was written on a ball. I hope Doug paid you because the last thing I will ever do is put \$20 towards someone who made my son cry for years.

J. COUNT TEN: On November 8, 2021, Respondent sent Petitioner a harassing message on Our Family Wizard, writing, "I do not want Carson going with you to Carol's apartment,

ever...If he needs to be anywhere on a weekly basis, it should be with his mother, not your side hustle.”

K. COUNT ELVEN: On November 5, 2021, Respondent sent Petitioner a message on Our Family Wizard that was not regarding their minor child, sending Petitioner an unsolicited apartment listing.

CLERK'S CERTIFICATE OF SERVICE

I hereby certify that a copy of this Order was delivered to:

- ☐ Petitioner, by ☐ hand ☐ US mail
 - ☐ Petitioner's counsel, by ☐ hand ☐ US mail
 - ☐ Sheriff's Office for service on Respondent
 - ☐ Respondent, by ☐ hand ☐ US mail
 - ☐ Respondent's counsel, by ☐ hand ☐ US mail
 - ☐ Respondent's prior counsel of record, _____ by ☐ hand ☐ US mail
 - ☒ Steven O'Brien, Assistant Prosecuting Attorney, by ☐ hand ☐ US mail ☒ Email
 - ☒ Kim Bettisworth, Chief Specially Appointed Court Attorney, by ☐ hand ☐ US mail ☒ Email
- this _____ day of _____, 20_____

Joan Gilmer, Circuit Clerk
St. Louis Co. Circuit Court

STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS)

SS

FILED

1A

AUG 10 2022

IN THE FAMILY COURT OF ST. LOUIS COUNTY
DOMESTIC VIOLENCE COURT
STATE OF MISSOURI

JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

DOUGLAS GRAHAM,
Petitioner

vs.

NICOLE M. GRAHAM,
Respondent

Cause No. 21SL-PND1769
(same # as the Order of Protection)

Division No. 31
(same # as the Order of Protection)

Respondent Identifiers				
SEX	RACE	D.O.B.	HT	WT
F	CAUCASIAN	7/25/1970	5' 8"	160
EYES	HAIR	EYES	SOCIAL SECURITY #	
BLUE	BLONDE/BROWN			
DRIVERS LICENSE #		STATE	EXPIRATION DATE	
MAKE OF AUTOMOBILE		LICENSE PLATE #	STATE	
JEEP WRANGLER			MO	
Distinguishing Features: <u>2 DOOR, BLACK, SOFT TOP</u>				

Respondent's Home Address:

14 LONG MEADOWS LN
TOWN + COUNTRY MO
63131

Respondent's Parent's Address:

Respondent's Work Address:

REMAX RESULTS
8081 MANCHESTER RD
BRENTWOOD, MO 63144

Other Address Where Respondent May Be Located:

**PETITIONER'S MOTION FOR AN APPOINTMENT OF A SPECIAL CONTEMPT
ATTORNEY TO REVIEW ALLEGATIONS THAT RESPONDENT VIOLATED THE
FULL ORDER OF PROTECTION**

COMES NOW Petitioner and states as follows:

1. I am the Petitioner in this matter.

2. On July 26, 20 21, the Court entered a Full Order of
Protection (hereinafter "O/P") for Petitioner against Respondent, to last until July 25,
20 22 [On July 21, 20 22, the Court extended the Full
Order of Protection, to last until AUGUST 29, 20 22]

CONTINUED HEARING
DATE - COPIES ATTACHED

3. According to the provision(s) of the O/P, the Court ordered Respondent to refrain from:

- A. ☒ abusing and threatening to abuse Petitioner;
- B. ☒ communicating with Petitioner;
- C. ☒ harassing and stalking Petitioner;
- D. ☒ entering the premises of Petitioner's residence or employment;
- E. ☒ coming within 500 feet of Petitioner;
- F. ☐ interfering with the award of custody of the parties' children to Petitioner;

G. ☒ COMMUNICATE ONLY THROUGH OUR FAMILY WIZARD APP
AND ONLY RE: MINOR CHILD CARSON GRAHAM
 (Indicate any other special provisions not otherwise covered above, which were ordered by the Court when the O/P was entered.)

COPY ATTACHED
IN PACKET

4. The O/P has at all times since its entry remained in full force and effect.

5. Respondent has willfully and intentionally violated the terms of the O/P as follows:

A. On APRIL 16, 2022, at approximately 7:23 AM/PM (state the time) at 430 N. GEYER RD. 63122 (state the location), in violation of the O/P restriction stated in Paragraph 3() (select the letter in paragraph 3, above, that corresponds with the O/P term that Respondent violated), Respondent did the following:

PARKED ACROSS ST. F/ WORK & RESIDENCE, WALKED TO FRONT OF PETITIONER WORK/RESIDENCE AND EXAMINE VEHICLE WITHIN OR UNDER 74' OF PETITIONER WORK/HOME. COLOR PHOTOS ATTACHED TIME/DATE STAMPED

B. On 6/27/22 4/1, 2022, at approximately VAR1 AM/PM at ELECTRONICALLY, in violation of the O/P restriction stated in Paragraph 3(), Respondent did the following: SENT TWO (2) SEPARATE E-MAILS TO PETITIONER - COPIES ATTACHED

C. On 5/20, 2022, at approximately 3:04 AM/PM at PHONE - CELL, in violation of the O/P restriction stated in Paragraph 3(), Respondent did the following: MADE CALL TO PETITIONER - NOT ANSWERED - PROOF, SCREEN CAPS ATTACHED

(Describe all claimed violations of the O/P, including dates, times and places, as specifically as possible. If there is not enough space, please use additional paper. If you have documents to support your claims, please attach them and refer to them in this section.) ADDITIONAL EVIDENCE ATTACHED + EXPLAINED WITH PROOF

6. Respondent's above violations were willful and with careless and imprudent disregard for the power and authority of the court.

7. (Please check one box)

☐ I am unaware of any proceedings in municipal or state court that relate to the prosecution of Respondent for the same violations of the O/P that I have described in paragraph 5 (above).

NOT
SURE

☒ The following municipal or state courts have charged Respondent with the same or similar violations of the O/P that I have described in paragraph 5 (above): SEE ATTACHED
COPY 22-1034 5/22/2022 FROM KIRKWOOD, MO POLICE
DEPARTMENT -- ACTIVE INVESTIGATION EXPLAINED TO ME?

WHEREFORE, Petitioner moves this court to appoint a Special Contempt Attorney to review both the above allegations and the case file, and if appropriate, file a Motion to Hold Respondent in Indirect Criminal Contempt.

[Signature]
Petitioner

8/10/2022
Date

STATE OF MISSOURI)
) SS.
COUNTY OF ST. LOUIS)

I, Petitioner herein, hereby swear or affirm that that the facts in the foregoing Motion are true and correct according to my best knowledge, information and belief.

[Signature]
Petitioner

Sworn or affirmed before me this 10 day of August, 20 22

[Signature]
Deputy Circuit Clerk/Notary Public/Judge

(For Notary Publics) My Commission Expires:

* NOTE: Petitioner should only sign her/his name on this line in the presence of a court clerk or a notary public. (A court clerk is always available at the Adult Abuse Office.)

Supporting Photographs, Documents and Evidence of Various Violations by Nicole M. Graham of Court Orders:

(additional evidence and videos are available—Please call if necessary)

ID copy attached for Nicole Marie Hummel Graham dob: 7/25/1970

1. Photos of Nicole M. Graham and Map of property with measurements of 500 foot violation stalking my work/business & residence
2. E-Mails from Nicole (2) in violation of order to only communicate via Our Family Wizard Application
3. Direct call evidence of direct phone call from Nicole aka "ICE"=In Case of Emergency in violation of the Order of Protection 7/26/2021
4. 3rd Party Contacting to find out information on me or ??? Many copies of friends texts to me in violation of the Order of Protection 7/26/2021
5. Harassment of Me Publicly posted in Nicole's Facebook page in violation of the Order of Protection 7/26/2021
6. Our Family Wizard communications from Nicole that are in violation of the Full Order of Protection of 7/26/2021. Several notes that are relationship themed...
7. Copy of the 1st Violation of the Ex Parte Order of 5/5/2021 where Nicole entered the Marital Residence at 14 Long Meadows Ln, Town & Country, MO 63131 with screen caps. I have full color copies available anytime.

Copies of three (3) separate reports made to Kirkwood Police Department;

1. 22-1034 of 5/25/2022 Currently an Active Investigation
2. Call # 451421 of 12/15/2021
3. Call # 451797 of 12/17/2021

FILED

AUG 10 2022

JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

Whereas Nicole M. Graham filed for dissolution of marriage... on 5/18/2021
<https://www.courts.mo.gov/casenet/cases/header.do?inputVO.caseNumber=21SL-DR02316&inputVO.courtId=CT21>

Violations of the AUTOMATIC FAMILY COURT ORDER RULE 68.3

(2) TERMS. A. Neither party shall harass, abuse, threaten to abuse, stalk, molest or disturb the peace of the other party or any of the parties' minor children, wherever they may be found. SEE attached Facebook post of Nicole Graham in violation.

C. Neither party shall cease payment for, or cause to be terminated, any coverage for the other party or any... under any policy of medical, ... insurance in force on the date of filing of the case unless ordered by the Court or unless consented to in writing by both parties. SEE attached copy of Notice from Nicole Graham in violation from the Our Family Wizard Application.

E. In any dissolution, legal separation or annulment action, neither party shall shut off, cease payment for, or cause to be terminated the usual and necessary utilities being provided to the residence of either party unless ordered by the Court or unless consented to in writing by both parties. SEE attached paperwork/proof for new internet service so that the minor children (Peyton Culbert-daughter and Carson Graham-son could do their homework) because of Nicole Graham putting the internet service on a vacation hold for 30 days.

F. In any dissolution, legal separation or annulment action..., Nor shall either party dissipate, sell, remove, assign, transfer, dispose of, lend, mortgage, or encumber any property of a party, real or personal, ... SEE attached copy of Our Family Wizard communication from Nicole Graham seeking details to sell my property-particularly an electronic sign valued at \$799.00 +/-.



IN THE 21ST JUDICIAL CIRCUIT, ST. LOUIS COUNTY, MISSOURI
Judgment of the Full Order of Protection - Adult

FILED

JUL 26 2021

JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY
(Date File Stamp)

Judge or Division: JULIA PUSATERI LASATER	Case Number: 21SL-PN01769																														
Petitioner: DOUGLAS GRAHAM	Court ORI Number: MO095015J																														
Relationship to Respondent (specified on petition): _____	MSHP Number: 210505122830																														
vs.	Responsible Law Enforcement ORI: MO095729																														
Respondent: NICOLE GRAHAM	Related Cases: Respondent Identifiers:																														
Address: 14 LONG MEADOWS LN. SAINT LOUIS, MO 63131	<table border="1"><tr><th>SEX</th><th>RACE</th><th>DOB</th><th>HT</th><th>WT</th></tr><tr><td>F</td><td>White</td><td>25-JUL-1970</td><td>68"</td><td>160 lbs.</td></tr><tr><th>HAIR</th><th>EYES</th><th colspan="3">SOCIAL SECURITY # (last four digits)</th></tr><tr><td>Brown</td><td>Blue</td><td colspan="3"></td></tr><tr><th colspan="2">DRIVERS LICENSE #</th><th>STATE</th><th colspan="2">EXP DATE</th></tr><tr><td colspan="2"></td><td></td><td colspan="2"></td></tr></table>	SEX	RACE	DOB	HT	WT	F	White	25-JUL-1970	68"	160 lbs.	HAIR	EYES	SOCIAL SECURITY # (last four digits)			Brown	Blue				DRIVERS LICENSE #		STATE	EXP DATE						
SEX	RACE	DOB	HT	WT																											
F	White	25-JUL-1970	68"	160 lbs.																											
HAIR	EYES	SOCIAL SECURITY # (last four digits)																													
Brown	Blue																														
DRIVERS LICENSE #		STATE	EXP DATE																												
CAUTION: <input type="checkbox"/> Weapon Involved <input type="checkbox"/> Concealed Carry Permit Holder	Distinguishing Features																														

Appearances: ☒ Petitioner ☒ Respondent ☐ Respondent Fails to Appear
☐ GAL ☒ Petitioner's Attorney ☒ Respondent's Attorney ☐ Other: _____

This Judgment shall be effective until: 7/25/22

ONLY THE COURT CAN CHANGE THIS ORDER

Violation of this Order may be punished by confinement in jail for as long as four years and/or by a fine of as much as \$10,000. If so ordered by the court, the Respondent is forbidden to enter or stay at the Petitioner's residence.

Visit www.courts.mo.gov for more information regarding orders of protections.

I. JURISDICTION & NOTICE

Petitioner has filed a verified petition requesting the issuance of a Judgment of a Full Order of Protection. The court hereby finds that it has jurisdiction over the parties and the subject matter. This court finds that Respondent was provided with reasonable notice and an opportunity to participate and be heard. A copy of the petition, a notice of the date set for the hearing, and the Ex Parte Order of Protection (if issued) were served upon Respondent at least three days prior to today's hearing.

II. ENFORCEABILITY

This Judgment meets all the requirements of the Violence Against Women Act, 18 U.S.C. Section 2265. This court has jurisdiction of the parties and the subject matter; the defendant has been given reasonable notice and opportunity to be heard. This order is enforceable in all 50 states, the District of Columbia, all Indian tribal lands, and all United States territories and shall be enforced as if it were an order of that jurisdiction without registration pursuant to 18 U.S.C. Section 2265.

III. FINDINGS

This court makes the following finding:

☒ Evidence adduced. Upon due consideration of the matter, this court finds, pursuant to section 455.040, RSMo, that Petitioner has proven allegations of domestic violence, stalking, and/or sexual assault against Respondent and the Respondent cannot show that his or her actions alleged to constitute abuse were otherwise justified under the law. This court, therefore, orders and finds the following as described in Section IV below.

☐ Petitioner and Respondent submit a proposed Consent Judgment to this court. Pursuant to the parties' request, this court orders and finds the following as described in Section IV below.

This court finds that Respondent's relationship to Petitioner is as follows:

☒ A. Is current or former spouse* ☐ B. Has child(ren) in common* ☐ C. Reside(d) together*
☐ D. (Is/was) related by blood/marriage ☐ E. Romantic/intimate social relationship ☐ F. None (stalking or sexual assault alleged)

☐ This court further finds that Respondent represents a credible threat to the safety of the Petitioner.*

* See Section VI Firearms.

IV. TERMS (Only Checked Provisions Apply)

The court orders:

- ☒ This Judgment of the Full Order of Protection replaces and supersedes the Ex Parte (Temporary) Order of Protection entered in this cause on 5/5/21 and serves as notice of the termination of that Order.
- ☐ This Judgment renews the Judgment of the Full Order of Protection entered on _____ and serves as notice of the extension of that Judgment.

A. CONTACT

- ☒ 1. Respondent **SHALL NOT COMMUNICATE** with Petitioner, in any manner or through any medium. The use of third parties (including children) to communicate is strictly prohibited. [05]
- ☒ 2. Respondent shall not commit or threaten to commit domestic violence, molesting, stalking, sexual assault, or disturbing the peace of Petitioner. [01 & 04]
- ☒ 3. Respondent shall not harass, stalk or threaten Petitioner or engage in other conduct that would place Petitioner in reasonable fear of bodily injury to Petitioner.*
- ☒ 4. Respondent shall not use, attempt to use, or threaten to use physical force against Petitioner that would reasonably cause bodily injury.* [01]

* See Section VI Firearms.

B. RESTRICTIONS

- ☒ 1. Petitioner is granted exclusive possession of the premises of Petitioner's/the parties' residence (located at wherever located). Respondent shall immediately vacate and/or shall not enter upon the premises of Petitioner's/the parties' residence (or the residence located at _____). Further, Respondent shall not knowingly enter upon the premises of any future residence of Petitioner. **RESPONDENT IS FORBIDDEN TO ENTER OR STAY AT PETITIONER'S RESIDENCE.** [03 & 04]
- ☐ 2. Respondent may only enter Petitioner's residence located as listed above on _____, for the purpose of removing his/her clothing, toiletries, tools of trade and the following personal property: _____ Respondent must be accompanied by a law enforcement officer.
- ☒ 3. This court finds that, in order to ensure Petitioner's safety, Respondent shall not: [04]
- ☐ Enter onto the premises of Petitioner's school, located at _____
- ☒ Enter onto the premises of Petitioner's place of employment, located at wherever located
- ☒ Come within 500 feet of Petitioner.
- ☐ Other: _____
- ☐ 4. Respondent shall not take, hide, transfer, sell, damage, encumber or otherwise dispose of property mutually owned or leased with Petitioner: _____ [08]
- ☐ 5. Petitioner shall receive temporary possession of the personal property.
- ☐ 6. Petitioner is granted the possession and use of the following vehicle(s): _____
- Respondent must not be present in the restricted locations at any time unless expressly permitted by another term in this Judgment.**

C. CUSTODY

- ☐ 1. The parties have no unemancipated children in common.
- ☐ 2. A prior judgment/order regarding custody of the parties' unemancipated child(ren) is pending or has been made. Therefore, pursuant to section 455.050.3(1), RSMo, this court cannot change the previous custodial arrangements through this Judgment.
- ☐ 3. No prior judgment/order regarding custody of the parties' unemancipated child(ren) is pending or has been made.
- Custody of the children shall be awarded as follows:
- | Child's Name | Person Awarded Custody [Respondent-06, Petitioner-09] |
|--------------|---|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
- ☐ 4. A visitation schedule shall be established for ☐ Petitioner ☐ Respondent [06] as follows: _____
- ☐ 5. The parties shall exchange the minor child(ren) for visitation at _____

D. SUPPORT

1. Child Support

- ☐ The Form 14 (Child Support Calculation Guidelines Worksheet) is attached and recommends that
☐ Respondent ☐ Petitioner pay Petitioner/Respondent \$_____ per month (Pursuant to Rule 88.01).

(Only Checked Provision(s) Apply)

- ☐ a. This court finds that the Form 14 amount is unjust and inappropriate. Accordingly, ☐ Respondent ☐ Petitioner must pay ☐ Petitioner ☐ Respondent \$_____ ☐ per month ☐ per week, with the first payment due on _____.
- ☐ b. This court finds that child support should be in accordance with the attached Form 14 amount and orders that ☐ Respondent ☐ Petitioner pay ☐ Petitioner ☐ Respondent \$_____ ☐ per month ☐ per week, with the first payment due on _____.

2. Maintenance

- ☐ Respondent ☐ Petitioner shall pay \$_____ ☐ per month ☐ per week in maintenance to ☐ Petitioner ☐ Respondent, with the first payment due on _____.

3. Other Support

- ☐ a. Respondent shall pay Petitioner's rent or mortgage in the amount of \$_____ ☐ per month ☐ per week, with the first payment due on _____ to ☐ Petitioner ☐ other: _____.
- ☐ b. Respondent shall pay for housing or other services provided to Petitioner by a shelter for victims of domestic violence in the amount of \$_____ ☐ per month ☐ per week, with the first payment due on _____ to ☐ Petitioner ☐ other: _____.
- ☐ c. Respondent shall pay \$_____ to Petitioner for out-of-pocket losses (which can include medical, dental, relocation and moving expenses; counseling costs; loss of earnings; and costs of repair or replacement of real or personal property) sustained by an act/acts of domestic violence committed by Respondent.

4. Income Assignment

- ☐ Respondent ☐ Petitioner shall execute an income assignment in favor of ☐ Petitioner ☐ Respondent for:
☐ child support ☐ maintenance.

NOTE: This Judgment does not permanently resolve support issues. (Section 455.060.4, RSMo)

E. COUNSELING/TREATMENT

- ☐ 1. Respondent shall participate in a court approved counseling program(s) for ☐ batterers and/or ☐ substance abuse treatment at _____ beginning on _____.

F. CONCEALED CARRY PERMIT (Pursuant to section 571.104, RSMo)

If Respondent has a concealed carry permit, he/she must immediately surrender the permit to this court.

G. OTHER CONDITIONS OR RELIEF ORDERED:

- ☐ 1. Petitioner's residential address on voter's registration record to be closed to the public.
- ☐ 2. Petitioner to be transferred existing wireless telephone number(s) and billing responsibility from Respondent. See attached Wireless Telephone Number Transfer Addendum.
- ☐ 3. _____

H. COSTS/FEES

- ☐ 1. Respondent shall pay to ☐ Petitioner ☐ Petitioner's attorney attorney's fees in the amount of \$_____.
- ☐ 2. Respondent shall pay the Guardian ad Litem's attorney fees in the amount of \$_____.
- ☐ 3. Respondent shall pay the following court costs: _____.

I. COMPLIANCE REVIEW DATE

- ☐ 1. Respondent must return to court on _____ (date), at _____ (time) to demonstrate compliance with this court's Judgment. Petitioner need not return to court to enforce this Judgment.

V. DURATION

This Judgment shall be effective until 7/25/22 unless sooner terminated or extended by this court.

- ☐ This court finds that it is in the parties' best interests that this Order shall automatically renew after one year, making this Order effective until _____ unless the Respondent requests a hearing by 30 days prior to the expiration. (Note: this provision only applies to full orders of protection that have a duration of one year.)

VI. FIREARMS

- ☐ The court finds that:
- as a result of a hearing at which the Respondent received notice and had an opportunity to participate; and,
 - Respondent is a spouse, former spouse, is or was cohabitating, or has a child in common with the Petitioner; and,
 - Respondent is a credible threat to the physical safety of, or is explicitly prohibited within this Order from the use, attempted use, or threatened use of physical force that would reasonably be expected to cause bodily injury against the Petitioner; and,
 - Respondent is restricted from harassing, stalking or threatening the Petitioner, the child they have in common or a child of the Petitioner's partner, or from engaging in any conduct that would place the Petitioner in reasonable fear of bodily injury to him or her self, the child in common, or child of the Petitioner's partner.

THEREFORE, FEDERAL LAW PROHIBITS RESPONDENT FROM POSSESSING, SHIPPING, TRANSPORTING AND/OR RECEIVING ANY FIREARM FOR THE DURATION OF THIS JUDGMENT [SEE 18 U.S.C. SECTION 922(g)(8)].

VII. MODIFICATION OF JUDGMENT

The parties cannot change the terms of this Judgment on their own. This Judgment may only be modified by this court.

VIII. NOTIFICATION OF JUDGMENT OF FULL ORDER TO RESPONDENT

This Judgment is to be provided to Respondent by: ☐ hand delivery (in court) ☒ personal service ☐ certified mail.

FOR CONSENT JUDGMENT ONLY

Respondent's consent is not to be considered an admission that the allegations contained in the Petition are true; however, Respondent consents to this court's issuance of this Judgment. Respondent acknowledges the receipt of this Judgment of the Full Order of Protection.

PETITIONER'S SIGNATURE

RESPONDENT'S SIGNATURE

PETITIONER'S ATTORNEY'S SIGNATURE

RESPONDENT'S ATTORNEY'S SIGNATURE

SO ORDERED:

7/26/21
Date

[Signature]
Judge

Div. 32

Notice of Findings and Recommendations & Notice of Right to Rehearing

The parties are notified that the foregoing Findings and Recommendations have been entered this date by a commissioner, and all papers relative to the case or proceedings, together with the Findings and Recommendations, have been transferred to a judge of the court. The Findings and Recommendations shall become the Judgment of the court upon adoption by order of the judge. Unless waived by the parties in writing, a party to the case or proceeding heard by a commissioner, within fifteen days after the mailing of notice of the filing of the Judgment of the court, may file a motion for rehearing by a judge of the court. If the motion for rehearing is not ruled on within forty-five days after the motion is filed, the motion is overruled for all purposes. SCR 130.13

Date

Commissioner

Order and Judgment Adopting Commissioner's Findings and Recommendations

It is hereby ordered, adjudged and decreed that the foregoing Findings and Recommendations entered by the commissioner are adopted and confirmed as a final Judgment of the court.

Date

Judge

Sheriff's or Server's Return

I certify that I served this Order at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time), by:
(Check one)
☐ delivering a copy of the Order to _____ (name).
☐ leaving a copy of the Order at the dwelling place or usual abode of _____ (name)
with _____ (name), a person of _____'s (name) family over the age of 15 years.
☐ other (describe) _____
☐ Respondent is under the age of 17 and not emancipated. A custodial parent, guardian, or court appointed GAL was served and
is required to appear and bring Respondent before the court.

Complete any known identifying information regarding Respondent that has not been already provided:

Age: _____ D.O.B.: _____ S.S.N. (last four digits): _____ Race: _____ Sex: _____
Height: _____ Weight: _____ Hair Color: _____ Eye Color: _____ License Plate No.: _____
Identifying Marks: _____

Printed Name of Sheriff or Server

Sheriff or Server

Agency ORI

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on this _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

☐ Respondent's permit has been surrendered for concealed carry suspension and is attached.

Missouri and federal law provide that the costs and fees for service of protection orders are not required. (455.027 RSMo & 42 U.S.C. Section 3796gg-5)

Complete for Out of State Service

I certify that:

1) I am authorized to serve process in civil actions within the state or territory where the above Order was served.

2) My official title is _____ of _____ County, _____ (state).

Served in _____ County, _____ (state), on _____ (date) at _____ (time).

Subscribed and Sworn To before me on this _____ (date).

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
☐ the judge of the court of which affiant is an officer.
☐ authorized to administer oaths in the state in which the affiant served the above summons.
(use for out-of-state officer)
☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

☐ Respondent's Missouri concealed carry permit has been surrendered for concealed carry suspension and is attached.

Missouri and federal law provide that the costs and fees for service of protection orders are not required. (455.027 RSMo & 42 U.S.C. Section 3796gg-5)

Directions to Officer Making Return on Service

A copy of the Order must be served on each person. If any person refuses to receive the copy of the Order when offered to him/her, the return shall be prepared to show the offer of the officer to deliver the order and the person's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an incompetent person not having a legally appointed guardian, by delivering a copy of the Order to the individual personally or by leaving a copy of the Order at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the Order to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an incompetent person who has a legally appointed guardian, by delivering a copy of the Order to the guardian personally.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory in the United States. If served in a territory, substitute the word "territory" for the word "state."

If served outside of Missouri, the officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

The return should be made promptly.

IN THE 21st JUDICIAL CIRCUIT, ST. LOUIS COUNTY,

DOUGLAS GRAHAM,

Petitioner,

And

NICOLE GRAHAM,

Respondent.

Cause No. 21SL-PN01769

Division No. 35

REQUEST BY CONSENT TO AMEND JUDGMENT

By consent of the parties, the parties move this court to amend the Full Order of Protection entered on July 26, 2021, to permit the parties to communicate only on issues regarding the minor child, Carson Magnus Magilla Graham, and only through Our Family Wizard.

LAKE MUNRO, LLC

By: 

Kevin T. Lake, MBE# 47708
Attorney for Petitioner
7777 Bonhomme Avenue, Suite 1501
Clayton, Missouri 63105
(314) 863-0077 - Telephone
(314) 863-7494 - Facsimile
klake@lakemunrolaw.com

SINDEL NOBLE, P.C.

By: /s/Stephanie Fortus

Stephanie Fortus, MBE# 48841
Attorney for Respondent
8000 Maryland Ave., Ste. 910
Clayton, MO 63105
Telephone: (314) 721-6040
Facsimile: (314) 721-8545
Sfortus@travisnoble.com

SO ORDERED:



Judge
August 09, 2021

Div. 32

Certificate of Service

A true and accurate copy of the above and foregoing was served upon all parties of record, in accordance with Rule 84.06(g) and Rule 103.08 of the Missouri Rules of Civil Procedure, through the electronic filing system of the State of Missouri on this 6th day of August, 2021.

/s/Kara Skillington

Nicole Graham is waiting to connect

Nicole Graham (via Nextdoor) <no-reply@rs.email.nextdoor.com>

Mon 6/27/2022 10:01 AM

To:

- grahamdoug@msn.com <grahamdoug@msn.com>

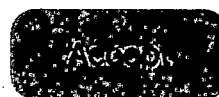
nextdoor

**Your neighbors are waiting to
connect with you**



Nicole Graham

Ballas-Clayton-Bopp-Geyer



View all requests

This message was intended for grahamdoug@msn.com
Unsubscribe or adjust your email settings

Nextdoor, 420 Taylor Street, San Francisco, CA 94102

E-MAIL
TO
DOUGLAS
VIA
NEXT DOOR APP

STACKING
4/16/2022

@
WORK & HOME
WITHIN 74' F/ FRONT DOOR

NICOLES
JEEP



NICOLE

AT MY RESIDENCE & PLACE OF WORK
430 N. GEYER RD.
KIRKWOOD, MO 63131

APRIL 16, 2022

PART OF POLICE REPORT KIRKWOOD, MO



WYZE

2022-04-16 07:23:02

AT MY OFFICE & RESIDENCE

DATE & TIME STAMP

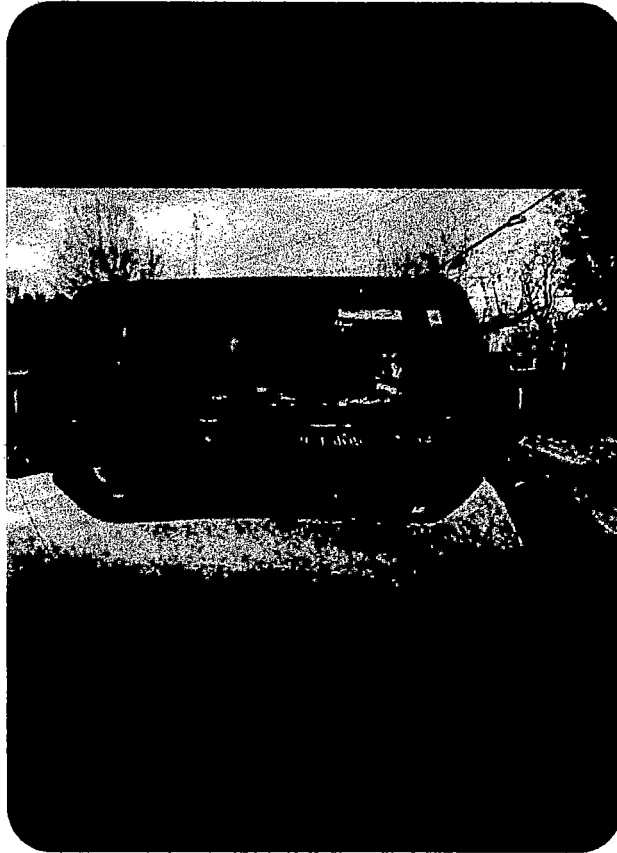
7:31



Carson >

202KB

Sat, Apr 16, 10:57 AM



SAME DAY
PICTURE NICOLE
TOOK AND SENT by
TEXT TO SON
CARSON GRAHAM
WHILE PARKED
ACROSS STREET

Wonder wear this Photo was taken



Mon, Apr 18, 9:23 AM

Tap to Download



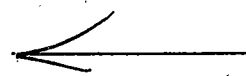
11:56



Michelle >

Text Message
Today 11:11 AM

Doug, hi....it's
ummm.....Michele McCord.
Your ex wife sent me a friend
request on Facebook which
confused me. I thought you
guys were still together. Now
we are messaging each other. I
think she is accusing me of
"being with you" then
messed me your phone
number saying she bets you
would love to hear from you. I
told her I had nothing but good
memories of you and that we
were just kids. Should I block
her? Should I continue "trying"
to be nice to her? I really don't
need this kind of high school
drama. Anyway...hope you are
well?



By the way...this is an online
number. Can only text when I
have wifi.



Text Message



10:48



Susan >

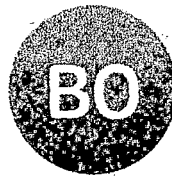
Tue, Jun 14, 4:35 PM

Hey there! Hope you are well!!
Got this lovely vm message
from Nicole last night. Not sure
what she wants from me but I
blocked her number. Not
interested. Just thought I'd
share.



AUDIO_3500.m4a

10:40



Beth >

iMessage
Tue, Jun 14, 6:50 AM

Hey got a question for you- isn't this your ex?



Earlier



Becky Rosenberg
Liebau commented on
Lindsay Hassing Sa...

...

6h · "Gorgeous pictures! G..."



Nicole Hummel-
Graham sent you a
friend request.

...

1 mutual friend

Confirm

Delete



Lindsay Hassing
Samulak is at Fat
Daddy's Smokehou...

...

8h



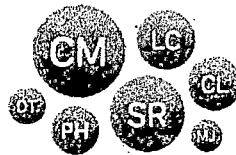
Lani Martin Fabere
shared Chris Fabere's
post.

...

Divorce not final yet. But yes

Nicole started stalking all my

10:32



15 People >

Tue, Jun 14, 11:55 PM

Larry Cecilio



Nicole Hummel-Graham

Know Thyself

Sent you a friend request

Respond

Message



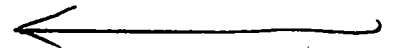
Broker/Associate at RE/MAX Results

Studied Economics and Mathematics at University of New...

Lives in Town and Country, Missouri

From New Orleans, Louisiana

Uh, Magilla, got an interesting FB friend request, had to check twice before Ghosting it...

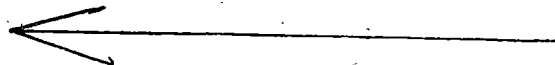


Wed, Jun 15, 7:05 AM

Mike Jakubec



Yep, me too



Send Message

