

FILED

AUG 10 2022

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

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)

Table with columns: SEX, RACE, D.O.B., HT, WT, EYES, HAIR, SOCIAL SECURITY #, DRIVERS LICENSE #, STATE, EXPIRATION DATE, MAKE OF AUTOMOBILE, LICENSE PLATE #, STATE. Includes handwritten entries like 'F', 'CAUCASIAN', '7/25/1970', '5' 8"', '160', 'BLUE', 'BLONDE/BROWN', 'JEEP WRANGLER', 'MO'.

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, 2021, the Court entered a Full Order of Protection (hereinafter "O/P") for Petitioner against Respondent, to last until July 25, 2022. [On August 21, 2022, the Court extended the Full Order of Protection, to last until August 29, 2022.] 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/ WORKER'S RESIDENCE, WALKED TO FRONT OF PETITIONER WORK/RESIDENCE AND EXAMINE VEHICLE WITHIN OR UNDER 74' OF PETITIONER WORK/HOME. COLOR PHOTOS ATTACHED TIME/DATE

B. On 6/27/22 AM 4/1, 2022, at approximately VARI AM/PM at ELECTRONICALLY STAMPED, in violation of the O/P restriction stated in Paragraph 3(), Respondent did the following: SENT TWO (2) SEPERATE 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.

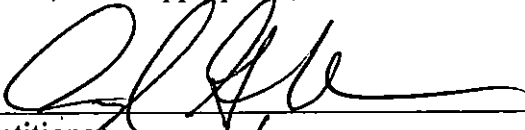
7. (Please check one box)

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.



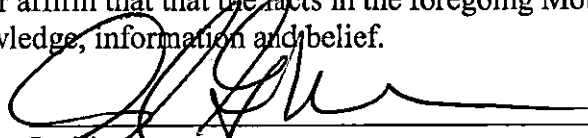
Petitioner

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.



Petitioner

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



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.)