

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS, MISSOURI

CAMPAIGN FOR ACCOUNTABILITY,)
660 Pennsylvania Ave., SE, Ste. 303,)
Washington, DC 20003,)
Relator,)
V.)
CIRCUIT COURT CLERK JOAN M. GILMER,)
TWENTY-FIRST CIRCUIT FOR THE)
COUNTY OF ST. LOUIS,)
Respondent.)
REAL PARTIES AT INTEREST:)
ANDREW F. PUZDER,)
C/O Jerome F. Raskas, Attorney,)
7701 Clayton Road,)
St. Louis, MO 63117)
and)
LISA PUZDER HENNING,)
C/O Alisse Cheryl Camazine, Attorney,)
165 N. Meramec Ave., Ste. 110,)
St. Louis, MO 63105)
Interested Parties.)

Case No. _____
Division _____

PETITION FOR WRIT OF PROHIBITION

COMES NOW Relator, by and through counsel, and for its Petition for Writ of Prohibition states and alleges as follows:

1. That this is a civil action seeking an order of the Court pursuant to Section 452.430¹, as further set out below, and pursuant to Supreme Court Rule 97².

¹All references to statutes herein are to the Revised Statues of Missouri (2016).

²Mo. Sup. Ct. R. 97.

2. That the Court has jurisdiction over this action pursuant to Section 452.430.
3. That Relator Campaign for Accountability is a not-for-profit corporation in good standing in the District of Columbia and has applied for recognition as a 501(c)(3) with the Internal Revenue Service, with its principal offices in Washington, D.C.
4. That the identified parties of interest named in this petition formerly were plaintiff and defendant in certain matters which were before the Circuit Court of the State of Missouri, 21st Circuit for the County of St. Louis, specifically in Case Numbers 21482862, 21577367, 21546046, 21546046-01 and 21546046-02, during the period between 1982 to 1997, and which are identified by their names in court docket records for those cases in the 21st Circuit for the County of St. Louis, all of which are attached as Exhibit A to this Petition.
5. That Section 452.430 states “All pleadings and filings in a dissolution of marriage ... or modification ... filed prior to August 28, 2009, ... shall be subject to inspection only by the parties, an attorney of record, ... or upon order of the court for good cause shown.”
6. That Relator has attempted to access the cases cited above, as set out in the attached affidavit marked as Exhibit B, but has been unable to gain access to those court records in that Relator is not a party to the cases, and is not within the class of all the parties who are identified in Section 452.430 as having access to the pleadings in these cases identified above without order of this Court.
7. That a party at interest, Andrew F. Puzder, has been named by United States President Donald Trump as his designated nominee for Secretary of Labor and his confirmation is pending before the United States Senate at this time.
8. That pursuant to the United States Constitution, Art. II, Sec. 2, the United States Senate has the authority to provide “Advice and Consent” in regard to the United States President’s nominations for cabinet officials, including the Secretary of Labor. Therefore,

information regarding the background and prior acts of Andrew Puzder – including information regarding his prior marriage and his divorce proceeding, which was heard in the 21st Circuit Court, State of Missouri – are of high interest and concern to the members of the Senate Health, Education, Labor and Pensions Committee, who will conduct the hearing on Mr. Puzder’s nomination, as well as the public at large.

9. That further, given that he has accepted the nomination and agreed to provide the U.S. Senate with considerable information that otherwise would remain private, Andrew Pudzer has acknowledged the position he seeks makes him a public figure. As a result, any right to privacy that he might claim to documents in the case files that might be considered closed pursuant to Section 452.430 should be overridden by this Court.

10. That attached to this petition is Relator’s Suggestions in Support, which are incorporated herein.

WHEREFORE, Relator requests that a preliminary order in Prohibition be issued by this Court commanding Respondent to file an answer directed to this petition.

Respectfully submitted,

/s/ Jean Maneke

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