



Paul Martin <paul@paulmartinpc.com>

Re: Attached

1 message

Paul Martin <paul@paulmartinpc.com>
To: Matt Pirrello <pirrello@charter.net>

Fri, Feb 22, 2013 at 4:14 PM

Matt:

I was thinking that the Honda and Ruby's guns incidents occurred prior to Sansone one. As such they would have established notice on his part of the Charter provision. By themselves, they don't seem very compelling and allow him to argue, perhaps justifiably, that we're picking nits.

Check out the revised version. If you think we need to add the others on, call me.

Paul

On Fri, Feb 22, 2013 at 9:59 AM, Matt Pirrello <pirrello@charter.net> wrote:

Dates and min for both.

RGD was at the parks bldg

I'll work on the rest

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Friday, February 22, 2013 9:51 AM
To: Matt Pirrello
Subject: Re: Attached

Matt--See below. I also need details as to Ruby's Guns. When? Where? What kind of meeting? Was his pre-meeting discussion about the petition? Also, I'm assuming RGD was at City Hall. Please confirm. Paul

On Thu, Feb 21, 2013 at 2:04 PM, Matt Pirrello <pirrello@charter.net> wrote:

Nice work

A couple of notes:

F3 is that supposed to read "notion" or "motion"?

NOTION.

C1 do we know to whom it was disclosed?

A9 ALLIANCE. MIGHT ADD THIS.

B10 "2002" ?

FIXED.

Add F4 demand for a gun and badge.

IT'S ELSEWHERE IN DOC, AND IT REALLY WASN'T A "DEMAND".

In addition to the Ruby's gun incident there is the Royal Gate Dodge incident witnessed by Troy, me and Linda. June 14 2012 at 5PM a meeting was called to discuss RGD temporary use of the Kia dealership at the parks building. Prior to opening the meeting Mayor Paul engaged in discussion with the petitioners regarding their petition. I (and the others) informed him of violating the charter because the meeting had not been called to order. He responded to me "what's the big deal" and kept talking with the petitioner. Later commenting "man you guys are picky".

B3 - while preparing for the ribbon cutting he announced he had a few too many to the entire crowd. Change to members of the public and chamber. Lori is not clear.

SEE BELOW.

B6 - change to purchased a juice and small (airline bottle) of dark alcohol... I can't be 100% on apple or Beam. Thoughts?

SEE BELOW.

Unfortunately, the people I interviewed regarding the Honda incident are unreliable. I have further concerns regarding this and similar incidents where he could get one of his devout followers to lie against any affirmative testimony. So, my question is, do we leave it alone and let Chung figure it out or do we pull it on the front side?

WHILE I LIKE BOTH, I AGREE AND HAVE DELETED THEM FROM THE DOC.

I will read it again in a few hours to see if I missed anything else.

All for now

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Thursday, February 21, 2013 10:48 AM
To: Kevin Bookout; Kate Demeter; Matt Pirrello; Dawn Anglin; Tom Felgate
Subject: Attached

This is the draft removal resolution. I am sending it to each of you so that each of you can verify those facts of which you are aware. In other words, if I misrepresent something, you MUST let me know. If you are aware of anything I have missed, like the Ruby's Guns thing, which I don't know about, LET ME KNOW.

It is critical that the facts alleged be accurate, and it is also critical that each of you are able and willing to testify to those facts of which you are aware. Please understand the importance of this. You must be absolutely comfortable with the facts noted, because you will very likely be subjected to cross-examination by Mr. Pleban on those facts.

Please review the attached thoroughly and critically, and respond with your comments or concurrence as quickly as possible. Please send this to Kelly Murray as well so that he may do the same.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

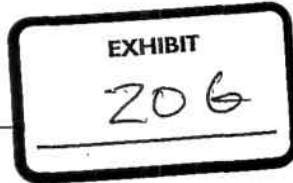
Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

Re: Attached

Fri, Feb 22, 2013 at 4:14 PM

Paul Martin <paul@paulmartinpc.com>
To: Matt Pirrello <pirrello@charter.net>

oops.

On Fri, Feb 22, 2013 at 9:59 AM, Matt Pirrello <pirrello@charter.net> wrote:

Dates and min for both.

RGD was at the parks bldg

I'll work on the rest

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Friday, February 22, 2013 9:51 AM
To: Matt Pirrello
Subject: Re: Attached

Matt--See below. I also need details as to Ruby's Guns. When? Where? What kind of meeting? Was his pre-meeting discussion about the petition? Also, I'm assuming RGD was at City Hall. Please confirm. Paul

On Thu, Feb 21, 2013 at 2:04 PM, Matt Pirrello <pirrello@charter.net> wrote:

Nice work

A couple of notes:

F3 is that supposed to read "notion" or "motion"?

NOTION.

C1 do we know to whom it was disclosed?

A9 ALLIANCE. MIGHT ADD THIS.

B10 "2002" ?

FIXED.

Add F4 demand for a gun and badge

IT'S ELSEWHERE IN DOC, AND IT REALLY WASN'T A "DEMAND".

In addition to the Ruby's gun incident there is the Royal Gate Dodge incident witnessed by Troy, me and Linda. June 14 2012 at 5PM a meeting was called to discuss RGD temporary use of the Kia dealership at the parks building. Prior to opening the meeting Mayor Paul engaged in discussion with the petitioners regarding their petition. I (and the others) informed him of violating the charter because the meeting had not been called to order. He responded to me "what's the big deal" and kept talking with the petitioner. Later commenting "man you guys are picky".

B3 – while preparing for the ribbon cutting he announced he had a few too many to the entire crowd. Change to members of the public and chamber. Lori is not clear.

SEE BELOW.

B6 – change to purchased a juice and small (airline bottle) of dark alcohol... I can't be 100% on apple or Beam. Thoughts?

SEE BELOW.

Unfortunately, the people I interviewed regarding the Honda incident are unreliable. I have further concerns regarding this and similar incidents where he could get one of his devout followers to lie against any affirmative testimony. So, my question is, do we leave it alone and let Chung figure it out or do we pull it on the front side?

WHILE I LIKE BOTH, I AGREE AND HAVE DELETED THEM FROM THE DOC.

I will read it again in a few hours to see if I missed anything else.

All for now

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Thursday, February 21, 2013 10:48 AM
To: Kevin Bookout; Kate Demeter; Matt Pirrello; Dawn Anglin; Tom Felgate
Subject: Attached

This is the draft removal resolution. I am sending it to each of you so that each of you can verify those facts of which you are aware. In other words, if I misrepresent something, you **MUST** let me know. If you are aware of anything I have missed, like the Ruby's Guns thing, which I don't know about, **LET ME KNOW**.

It is critical that the facts alleged be accurate, and it is also critical that each of you are able and willing to testify to those facts of which you are aware. Please understand the importance of this. You must be absolutely comfortable with the facts noted, because you will very likely be subjected to cross-examination by Mr. Pleban on those facts.

Please review the attached thoroughly and critically, and respond with your comments or concurrence as quickly as possible. Please send this to Kelly Murray as well so that he may do the same.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

--
THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.

Martin Production 0035


9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

 **Impeachment Resolution.2.22.REV.docx**
159K



Paul Martin <paul@paulmartinpc.com>

**Re: Attached**

1/2/2013, 10:00 AM

Paul Martin <paul@paulmartinpc.com>

Fri, Feb 22, 2013 at 4:14 PM

To: Matt Pirrello <pirrello@charter.net>

Matt:

I was thinking that the Honda and Ruby's guns incidents occurred prior to Sansone one. As such they would have established notice on his part of the Charter provision. By themselves, they don't seem very compelling and allow him to argue, perhaps justifiably, that we're picking nits.

Check out the revised version. If you think we need to add the others on, call me.

Paul

On Fri, Feb 22, 2013 at 9:59 AM, Matt Pirrello <pirrello@charter.net> wrote:

Dates and min for both.

RGD was at the parks bldg

I'll work on the rest

From: Paul Martin [mailto:paul@paulmartinpc.com]

Sent: Friday, February 22, 2013 9:51 AM

To: Matt Pirrello

Subject: Re: Attached

Matt--See below. I also need details as to Ruby's Guns. When? Where? What kind of meeting? Was his pre-meeting discussion about the petition? Also, I'm assuming RGD was at City Hall. Please confirm. Paul

On Thu, Feb 21, 2013 at 2:04 PM, Matt Pirrello <pirrello@charter.net> wrote:

Nice work

A couple of notes:

F3 is that supposed to read "notion" or "motion"?

NOTION.

C1 do we know to whom it was disclosed?

A9 ALLIANCE. MIGHT ADD THIS.

B10 "2002" ?

FIXED.

Add F4 demand for a gun and badge

IT'S ELSEWHERE IN DOC, AND IT REALLY WASN'T A "DEMAND".

In addition to the Ruby's gun incident there is the Royal Gate Dodge incident witnessed by Troy, me and Linda. June 14 2012 at 5PM a meeting was called to discuss RGD temporary use of the Kia dealership at the parks building. Prior to opening the meeting Mayor Paul engaged in discussion with the petitioners regarding their petition. I (and the others) informed him of violating the charter because the meeting had not been called to order. He responded to me "what's the big deal" and kept talking with the petitioner. Later commenting "man you guys are picky".

B3 – while preparing for the ribbon cutting he announced he had a few too many to the entire crowd. Change to members of the public and chamber. Lori is not clear.

SEE BELOW.

B6 – change to purchased a juice and small (airline bottle) of dark alcohol... I can't be 100% on apple or Beam. Thoughts?

SEE BELOW.

Unfortunately, the people I interviewed regarding the Honda incident are unreliable. I have further concerns regarding this and similar incidents where he could get one of his devout followers to lie against any affirmative testimony. So, my question is, do we leave it alone and let Chung figure it out or do we pull it on the front side?

WHILE I LIKE BOTH, I AGREE AND HAVE DELETED THEM FROM THE DOC.

I will read it again in a few hours to see if I missed anything else.

All for now

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Thursday, February 21, 2013 10:48 AM
To: Kevin Bookout; Kate Demeter; Matt Pirrello; Dawn Anglin; Tom Felgate
Subject: Attached

This is the draft removal resolution. I am sending it to each of you so that each of you can verify those facts of which you are aware. In other words, if I misrepresent something, you **MUST** let me know. If you are aware of anything I have missed, like the Ruby's Guns thing, which I don't know about, **LET ME KNOW**.

It is critical that the facts alleged be accurate, and it is also critical that each of you are able and willing to testify to those facts of which you are aware. Please understand the importance of this. You must be absolutely comfortable with the facts noted, because you will very likely be subjected to cross-examination by Mr. Pleban on those facts.

Please review the attached thoroughly and critically, and respond with your comments or concurrence as quickly as possible. Please send this to Kelly Murray as well so that he may do the same.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

Re: Attached

1 message

Paul Martin <paul@paulmartinpc.com>

Fri, Feb 22, 2013 at 12:21 PM

To: Matt Pirrello <pirrello@charter.net>

Let's get this teed up and then see where that goes.

On Fri, Feb 22, 2013 at 10:34 AM, Matt Pirrello <pirrello@charter.net> wrote:

Can we proceed with this even if he resigns?

From: Paul Martin [mailto:paul@paulmartinpc.com]

Sent: Friday, February 22, 2013 10:12 AM

To: Matt Pirrello

Subject: Re: Attached

No. Too contrived.

On Fri, Feb 22, 2013 at 10:02 AM, Matt Pirrello <pirrello@charter.net> wrote:

Could I adopt the ordinance at our next meeting?

From: Paul Martin [mailto:paul@paulmartinpc.com]

Sent: Friday, February 22, 2013 9:53 AM

To: Matt Pirrello

Subject: Re: Attached

As to F1, the funding involves too much legal analysis to get where we need to be. Re. other, since the charter references an ordinance to be adopted, and we have't adopted it, it has very little steam.

On Thu, Feb 21, 2013 at 2:18 PM, Matt Pirrello <pirrello@charter.net> wrote:

What about the funding (\$500) of the defense for the constitutional question? Have you connected any dots there?

Also, F1 – because this is a public doc I would like to see the complete language or at least the fact that violations under this section are misdemeanor crimes punishable by fine and or imprisonment as prescribed by ordinance.

Martin Production 0041

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Thursday, February 21, 2013 10:48 AM
To: Kevin Bookout; Kate Demeter; Matt Pirrello; Dawn Anglin; Tom Felgate
Subject: Attached

This is the draft removal resolution. I am sending it to each of you so that each of you can verify those facts of which you are aware. In other words, if I misrepresent something, you **MUST** let me know. If you are aware of anything I have missed, like the Ruby's Guns thing, which I don't know about, **LET ME KNOW**.

It is critical that the facts alleged be accurate, and it is also critical that each of you are able and willing to testify to those facts of which you are aware. Please understand the importance of this. You must be absolutely comfortable with the facts noted, because you will very likely be subjected to cross-examination by Mr. Pleban on those facts.

Please review the attached thoroughly and critically, and respond with your comments or concurrence as quickly as possible. Please send this to Kelly Murray as well so that he may do the same.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road

Martin Production 0042

St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

--
THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

—
THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

Re: Attached

1/1/2013

Paul Martin <paul@paulmartinpc.com>
 To: Matt Pirrello <pirrello@charter.net>

Fri, Feb 22, 2013 at 10:11 AM

No. Too contrived.

On Fri, Feb 22, 2013 at 10:02 AM, Matt Pirrello <pirrello@charter.net> wrote:

Could I adopt the ordinance at our next meeting?

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Friday, February 22, 2013 9:53 AM
To: Matt Pirrello
Subject: Re: Attached

As to F1, the funding involves too much legal analysis to get where we need to be. Re. other, since the charter references an ordinance to be adopted, and we have't adopted it, it has very little steam.

On Thu, Feb 21, 2013 at 2:18 PM, Matt Pirrello <pirrello@charter.net> wrote:

What about the funding (\$500) of the defense for the constitutional question? Have you connected any dots there?

Also, F1 – because this is a public doc I would like to see the complete language or at least the fact that violations under this section are misdemeanor crimes punishable by fine and or imprisonment as prescribed by ordinance.

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Thursday, February 21, 2013 10:48 AM
To: Kevin Bookout; Kate Demeter; Matt Pirrello; Dawn Anglin; Tom Felgate
Subject: Attached

This is the draft removal resolution. I am sending it to each of you so that each of you can verify those facts of which you are aware. In other words, if I misrepresent something, you MUST let me know. If you are aware of anything I have missed, like the Ruby's Guns thing, which I don't know about, LET ME KNOW.

It is critical that the facts alleged be accurate, and it is also critical that each of you are able and willing
 Martin Production 0044

to testify to those facts of which you are aware. Please understand the importance of this. You must be absolutely comfortable with the facts noted, because you will very likely be subjected to cross-examination by Mr. Pleban on those facts.

Please review the attached thoroughly and critically, and respond with your comments or concurrence as quickly as possible. Please send this to Kelly Murray as well so that he may do the same.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Martin Production 0045

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

Re: Attached

1 message

Paul Martin <paul@paulmartinpc.com>

Fri, Feb 22, 2013 at 9:53 AM

To: Matt Pirrello <pirrello@charter.net>

As to F1, the funding involves too much legal analysis to get where we need to be. Re. other, since the charter references an ordinance to be adopted, and we haven't adopted it, it has very little steam.

On Thu, Feb 21, 2013 at 2:18 PM, Matt Pirrello <pirrello@charter.net> wrote:

What about the funding (\$500) of the defense for the constitutional question? Have you connected any dots there?

Also, F1 – because this is a public doc I would like to see the complete language or at least the fact that violations under this section are misdemeanor crimes punishable by fine and or imprisonment as prescribed by ordinance.

From: Paul Martin [mailto:paul@paulmartinpc.com]**Sent:** Thursday, February 21, 2013 10:48 AM**To:** Kevin Bookout; Kate Demeter; Matt Pirrello; Dawn Anglin; Tom Felgate**Subject:** Attached

This is the draft removal resolution. I am sending it to each of you so that each of you can verify those facts of which you are aware. In other words, if I misrepresent something, you **MUST** let me know. If you are aware of anything I have missed, like the Ruby's Guns thing, which I don't know about, **LET ME KNOW**.

It is critical that the facts alleged be accurate, and it is also critical that each of you are able and willing to testify to those facts of which you are aware. Please understand the importance of this. You must be absolutely comfortable with the facts noted, because you will very likely be subjected to cross-examination by Mr. Pleban on those facts.

Please review the attached thoroughly and critically, and respond with your comments or concurrence as quickly as possible. Please send this to Kelly Murray as well so that he may do the same.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road

Martin Production 0047

St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

—
THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

Re: Attached

1/10/13

Paul Martin <paul@paulmartinpc.com>

Fri, Feb 22, 2013 at 9:51 AM

To: Matt Pirrello <pirrello@charter.net>

Matt--See below. I also need details as to Ruby's Guns. When? Where? What kind of meeting? Was his pre-meeting discussion about the petition? Also, I'm assuming RGD was at City Hall. Please confirm. Paul

On Thu, Feb 21, 2013 at 2:04 PM, Matt Pirrello <pirrello@charter.net> wrote:

Nice work

A couple of notes:

F3 is that supposed to read "notion" or "motion"?

NOTION.

C1 do we know to whom it was disclosed?

A9 ALLIANCE. MIGHT ADD THIS.

B10 "2002" ?

FIXED.

Add F4 demand for a gun and badge

IT'S ELSEWHERE IN DOC, AND IT REALLY WASN'T A "DEMAND".

In addition to the Ruby's gun incident there is the Royal Gate Dodge incident witnessed by Troy, me and Linda. June 14 2012 at 5PM a meeting was called to discuss RGD temporary use of the Kia dealership at the parks building. Prior to opening the meeting Mayor Paul engaged in discussion with the petitioners regarding their petition. I (and the others) informed him of violating the charter because the meeting had not been called to order. He responded to me "what's the big deal" and kept talking with the petitioner. Later commenting "man you guys are picky".

B3 - while preparing for the ribbon cutting he announced he had a few too many to the entire crowd. Change to members of the public and chamber. Lori is not clear.

SEE BELOW.

B6 – change to purchased a juice and small (airline bottle) of dark alcohol... I can't be 100% on apple or Beam. Thoughts?

SEE BELOW.

Unfortunately, the people I interviewed regarding the Honda incident are unreliable. I have further concerns regarding this and similar incidents where he could get one of his devout followers to lie against any affirmative testimony. So, my question is, do we leave it alone and let Chung figure it out or do we pull it on the front side?

WHILE I LIKE BOTH, I AGREE AND HAVE DELETED THEM FROM THE DOC.

I will read it again in a few hours to see if I missed anything else.

All for now

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Thursday, February 21, 2013 10:48 AM
To: Kevin Bookout; Kate Demeter; Matt Pirrello; Dawn Anglin; Tom Felgate
Subject: Attached

This is the draft removal resolution. I am sending it to each of you so that each of you can verify those facts of which you are aware. In other words, if I misrepresent something, you **MUST** let me know. If you are aware of anything I have missed, like the Ruby's Guns thing, which I don't know about, **LET ME KNOW.**

It is critical that the facts alleged be accurate, and it is also critical that each of you are able and willing to testify to those facts of which you are aware. Please understand the importance of this. You must be absolutely comfortable with the facts noted, because you will very likely be subjected to cross-examination by Mr. Pleban on those facts.

Please review the attached thoroughly and critically, and respond with your comments or concurrence as quickly as possible. Please send this to Kelly Murray as well so that he may do the same.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road

Martin Production 0050

St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

—
THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

Re: Attached

Paul Martin <paul@paulmartinpc.com>
 To: Matt Pirrello <pirrello@charter.net>

Thu, Feb 21, 2013 at 3:18 PM

The problem is that we haven't established the violation by ordinance, at least not to my knowledge.

On Thu, Feb 21, 2013 at 2:18 PM, Matt Pirrello <pirrello@charter.net> wrote:

What about the funding (\$500) of the defense for the constitutional question? Have you connected any dots there?

Also, F1 – because this is a public doc I would like to see the complete language or at least the fact that violations under this section are misdemeanor crimes punishable by fine and or imprisonment as prescribed by ordinance.

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Thursday, February 21, 2013 10:48 AM
To: Kevin Bookout; Kate Demeter; Matt Pirrello; Dawn Anglin; Tom Felgate
Subject: Attached

This is the draft removal resolution. I am sending it to each of you so that each of you can verify those facts of which you are aware. In other words, if I misrepresent something, you MUST let me know. If you are aware of anything I have missed, like the Ruby's Guns thing, which I don't know about, LET ME KNOW.

It is critical that the facts alleged be accurate, and it is also critical that each of you are able and willing to testify to those facts of which you are aware. Please understand the importance of this. You must be absolutely comfortable with the facts noted, because you will very likely be subjected to cross-examination by Mr. Pleban on those facts.

Please review the attached thoroughly and critically, and respond with your comments or concurrence as quickly as possible. Please send this to Kelly Murray as well so that he may do the same.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
 9322 Manchester Road
 St. Louis, Missouri 63119

Martin Production 0052

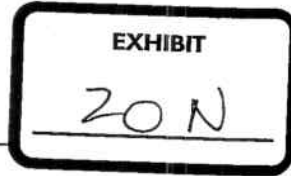
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

—
THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

Re: Mayor Paul

Paul Martin <paul@paulmartinpc.com>
 To: Matt Pirrello <pirrello@charter.net>

Wed, Feb 20, 2013 at 9:15 AM

Probably, but we don't want to go too far. See below.

"I move that the city attorney prepare a preliminary resolution for the removal of the mayor under Section 3.6 of the City Charter and that the City Council and staff, including the City Attorney, be authorized and directed to cooperate in the preparation of the resolution, *constraints of the Sunshine Law notwithstanding*. And to waive any privileged attorney-client communications related to the contents of the preliminary resolution."

On Wed, Feb 20, 2013 at 8:39 AM, Matt Pirrello <pirrello@charter.net> wrote:

Do we want to include anything about releasing you from client privilege communications at this time? See blue insert (or something similar).

From: Paul Martin [mailto:paul@paulmartinpc.com]
Sent: Wednesday, February 20, 2013 7:21 AM
To: Matt Pirrello
Subject: Fwd: Mayor Paul

Slight change, see italics below.

----- Forwarded message -----
From: Paul Martin <paul@paulmartinpc.com>
Date: Wed, Feb 20, 2013 at 7:17 AM
Subject: Mayor Paul
To: Matt Pirrello <pirrello@charter.net>

Matt:

At least for right now, I think the following motion will get the ball rolling in terms of Council direction to prepare the resolution.

"I move that the city attorney prepare a preliminary resolution for the removal of the mayor under Section 3.6 of the City Charter and that the City Council and staff, including the City Attorney, be authorized and directed to cooperate in the preparation of the resolution, *constraints of the Sunshine Law notwithstanding*. And to release and hold harmless the City attorney from all privileged

Martin Production 0054

communications specifically related to this matter."

Another motion to hold a special meeting (2/27) for considering the resolution would also be appropriate.

Paul

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

--

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

Mayor Paul

From: Mayor Paul

Paul Martin <paul@paulmartinpc.com>
To: Matt Pirrello <pirrello@charter.net>

Wed, Feb 20, 2013 at 7:17 AM

Matt:

At least for right now, I think the following motion will get the ball rolling in terms of Council direction to prepare the resolution.

"I move that the city attorney prepare a preliminary resolution for the removal of the mayor under Section 3.6 of the City Charter and that the City Council and staff, including the City Attorney, be authorized and directed to cooperate in the preparation of the resolution."

Another motion to hold a special meeting (2/27) for considering the resolution would also be appropriate.

Paul

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.



Paul Martin <paul@paulmartinpc.com>

EXHIBIT

20 P

Re: Adam Paul Matter

1 message

Paul Martin <paul@paulmartinpc.com>
To: Matt Pirrello <pirrello@charter.net>

Tue, Feb 26, 2013 at 1:33 PM

See attached revision, for whatever it's worth.

Are we going to have a closed session?

On Tue, Feb 26, 2013 at 12:01 PM, Matt Pirrello <pirrello@charter.net> wrote:

Sorry, KMOX got to me before your email did.

Please message the attached incase I need to put something out.

Otherwise, I will keep my pie hole shut.

From: Paul Martin [mailto:paul@paulmartinpc.com]

Sent: Tuesday, February 26, 2013 9:27 AM

To: Dawn Anglin; Linda Reel; Matt Pirrello; Roze Acup; Shelly Murray; Troy Pieper; Kevin Bookout; Kate Demeter

Subject: Adam Paul Matter

All:

In light of the Post-Dispatch article this morning, I thought it appropriate to remind everyone that if this effort moves forward, you will likely be a witness to or a judge of the proceedings, or both. Moreover, there are rules governing the manner in which the parties may conduct "discovery" or investigations concerning the charges. I urge everyone to avoid commenting on the matter for the time being, to the public, the press, or Mayor Paul's legal representatives. If the matter moves forward, Mr. Maupin will provide further guidance on these communications.

In the meantime, you can easily decline press comments due to the pending nature of the proceedings, and for council members, due to the fact that the Council will be the judge of the charges at the hearing.

Paul

Martin Production 0058

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:


Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

—
THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

 **For immediate releas1 (1).doc**
24K



Paul Martin <Paul@paulmartinpc.com>

CEC Hearing

Paul Martin <paul@paulmartinpc.com>

Sun, Feb 17, 2013 at 5:18 PM

To: Dawn Anglin <anglinz@charter.net>, Linda Reel <reelones@yahoo.com>, Shelly Murray <Shellymurray@sbcglobal.net>

Cc: Kate Demeter <kate@ellisville.mo.us>, Kevin Bookout <kbookout@ellisville.mo.us>

Bcc: Paul Martin <Paul@paulmartinpc.com>

Privileged Attorney-Client Communication

CEC Members:

In that the mayor is now represented by Chet Pleban, an experienced and formidable adversary, we have to assume that he will challenge any possible impeachment by the Council in court. While the evidence substantiates that the mayor ordered the POs to remove the residents, the real question—for me, at least—is whether these two isolated instances—one at the very beginning of his term and one very recent—are enough for a court to uphold an impeachment decision by the Council.

I have two concerns. First, courts interpret laws, including charters, by trying to determine the intent of the people who adopted them. In this case, the question is the intent of the voters of Ellisville in adopting Section 3.4(c) of the Charter. That intent may be best described by the title to the section, "Interference With Administration". A plain reading of the section indicates that the intent of the voters was to prohibit a council member from interfering in the day-to-day administration of city business, but was this prohibition intended to extend to prohibiting the chairperson of a meeting from removing an unruly meeting attendant? One can argue this both ways, which makes it very unclear to me what a judge would decide.

Second, the charged incidents may be too few and far between to justify removal. Put in a different context, if these were the only transgressions by the mayor since his election, would a judge find them sufficient to remove him from office? I am doubtful about that conclusion.

For both these reasons, the Commission should strongly consider recommending that the Council dismiss the complaint. If the Council desires to pursue impeachment based on these and other reasons, I think Section 3.6 of the Charter provides an avenue appropriate for further discussion. (In other words, I don't think the Council is limited in its removal powers to the CEC process.)

Tomorrow I will be providing you with two very simple alternative recommendations. One will recommend complaint dismissal and one will recommend Council consideration of the complaint. I'd recommend following the agenda, with the chair person asking at the appropriate time:

"Has everyone read the complaint and Mayor Paul's responses?"

"Does anyone need any additional information?"

"Does anyone have a motion?"

Presumably the answers will be yes, no, and move to recommend that the Council dismiss/consider the complaint.

If everyone follows the script, this could be a very brief meeting.

Please note that the agenda does not permit public comment, nor is it required, nor do I recommend that you allow it. This extends to the mayor and Mr. Pleban as well. Remember that the function of the commission is only to provide a recommendation. If the matter goes to a council hearing, then the mayor will have the right to be heard.

Martin Production 0060

As to Mr. Pleban's motions:

1. The request for a "discovery continuance" is not well-taken, because (a) there are no facts in dispute as to whether the orders were made by the mayor, (b) the CEC ordinance process does not allow for discovery, and (c) the mayor will have time to conduct his discovery if these charges are pursued by the council.
2. The motion to disqualify is a very complicated issue that requires a lengthy explanation, but it will hopefully suffice to say that the CEC, acting as the CEC, is not making a determination that will deprive Mayor Paul of any right or interest. All the CEC is doing is recommending to the Council whether to dismiss or consider the complaint. The disqualification motion is therefore premature. It will be considered if the matter moves forward to the Council.

I'd prefer not to address these legal issues at the CEC hearing tomorrow, so please do not raise them. If the Commission recommends to dismiss the complaint, there really is no need to address them at all.

Please call if you have any questions.

Paul

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

We are required to obtain client consent to communication by E-mail. Please note that there is a risk that such communications may be intercepted as they travel through the Internet or any network to which you are connected or from your own computer. Communications could be randomly intercepted by a disinterested person or intentionally intercepted by an interested person. We understand that you consent to communication by E-mail. If this is incorrect, please let us know immediately.

paulmartinpc.com

Mayor Paul Inquiries

Paul Martin <paul@paulmartinpc.com>

Wed, Feb 13, 2013 at 4:46 PM

To: Kevin Bookout <kbookout@ellisville.mo.us>, Kate Demeter <kate@ellisville.mo.us>, Tom Felgate <tfelgate@ellisville.mo.us>

Cc: Adam Paul <apaul@ellisville.mo.us>, Dawn Anglin <anglinz@charter.net>, Linda Reel <reelones@yahoo.com>, Matt Pirrello <mpirrello@brick.net>, Roze Acup <racup@interthinx.com>, Shelly Murray <Shellymurray@sbcglobal.net>, Troy Pieper <troy.pieper.lo1m@statefarm.com>

All:

I have been informed that Mayor Paul has been e-mailing and calling staff members to solicit information to prepare his response to the Katie James charter violation charges. In at least one instance, he recorded the telephone conversation without informing the other party beforehand.

First, I would like to remind each of you that the Charter Enforcement Commission does nothing more than make a determination as to whether there is reasonable ground for believing that the violation as charged is well-founded. The CEC makes this determination based on the complaint and any response filed by the mayor; there is no testimony heard by the CEC. If the commission finds probable cause, the matter is referred to the council, and the council holds a hearing, at which evidence can be presented. Your testimony may be required at that time, but it is not a part of the CEC process.

Second, I understand that the mayor's inquiries have asked about similar past instances that may have also amounted to charter violations. I do not see the relevancy of such information on the question of whether there is probable cause to believe that *he* has violated the charter as charged in the complaint. That information may be relevant in a hearing before the council, if the process gets that far, but it is not relevant to the CEC's responsibility to determine probable cause for the mayor's alleged violations.

Finally, as city attorney it is my responsibility to protect the interests of the city, as determined through and by the decisions of a majority of the city council. If the council determines that this process should move forward, the interests of the mayor and the council, i.e., the city, will be adverse. Written or oral (especially recorded) communications made by you to Mayor Paul could be used against the city at a later date.

For all these reasons, please do not speak with or write Mayor Paul about the CEC proceeding or any information he may wish to gather about that proceeding.

Of course, if Mayor Paul submits a Sunshine Law request for specifically identifiable documents, you should respond to the request as the law requires. You are free to communicate with Mayor Paul in all matters other than the CEC proceeding, i.e., either socially, or in his capacity as mayor or council member with regard to other city business.

Please call if you have any questions.

Paul

THIS IS A CONFIDENTIAL COMMUNICATION FROM THE LAW FIRM OF:

Paul Martin, P.C.
9322 Manchester Road
St. Louis, Missouri 63119
(314) 961-0097 x. 12 (Office)
(314) 805-8800 (Direct)
(314) 961-0667 (Fax)

Martin Production 0062