

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN MISSOURI

FILED

AUG 10 2015

Missouri Public
Service Commission

CLORIS BANKS TORREY

PLAINTIFF,

v.

JPMORGAN CHASE BANK, N.A

DEFENDANTS

Case No. 4:14CV01676 CDP

MEMORANDUM MISSOURI PSC ORDER DATED JULY 28, 2015
PLAINTIFF'S MOTION TO REOPEN AND FILE NEW AND MATERIAL
EVIDENCE AND EXHIBITS.

Plaintiff, Cloris Banks Torrey, pro se respectfully move the Court for Leave to file New and Material Evidence and exhibits in support of current complaint for declaratory judgment under 28 U.S.C. § 2201 pursuant Federal Rule of Civil Procedure 57 and FRCP38 and 39 govern a demand for a jury trial against Defendant JP Morgan Chase Bank N.A.

(collectively "JP Morgan Chase Bank N.A. et, al.) Laclede Gas Company a presumed Shell Company of Missouri under the Seal of Kennard L. Jones, Senior Regulatory Law Judge, by delegation of Authority pursuant to Section 386.240 RS Mo.2000.

Whereas, herein this Memorandum Cloris and Ronald Torrey (Wife and Husband) challenge jurisdiction of the PSC and the Court to collaborate a defense and create a bar for Laclede Gas to avoid its involvement as a concert player in this matter before the Court. States for the following reasons. Commission Kennard L. Jones, operates under Regulatory Authority that creates a political conflict of interest with the State and Federal Court. To the

demise of Cloris and Ronald Torrey in controversy of an amount of over \$100.00 dollars and this Court satisfies on Plaintiffs complaint. On June 22, 2015 plaintiff filed in this Court document titled in captioned "Notice Memorandum of Exhibits Pursuant to Rule 3.2 Expedited Litigation." The documentation and attached exhibits was submitted into this action admissible evidence of fraudulent forced-placed hazard insurance allege purchased doing litigation were violations Fraud upon on the Court.

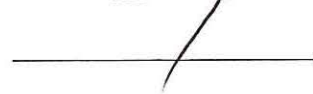
Conflict exists in this case by untimely unnecessary delay interference as it engage in a game of hide the "Ball" which is played by members of the Missouri and United States Bar.

On July 28, 2015 the Missouri Public Service Commission File No. GC-2015-0111 purported an Order Directing Complaints (Cloris and Ronald Torrey) to Respond to Motion to Dismiss by an unauthorized agent, specifically Morris L. Woodruff by his signature. SEE EXHIBIT 'EE' (Doc.1 pg.2) ATTACHED HERETO AND MADE A PART HEREOF.

Wherefore, Plaintiff respectfully prays as follows; (a) that the Court declare that the actions of Respondents complained of herein are in violation under the Civil Rights Act of 1871 (42 U.S.C.A Section 1983, Fourteen Amendment, and Fourth Amendment. (b) That Respondents are ordered to take affirmative actions to ensure that the activities complained above never again are engaged in by them or any of their agents; (c) That Respondents, their agents, employees, and successors are permanently enjoined from discriminating on the basis of familial status against any persons in violation of the protected rights (d) That appropriate compensatory and punitive damages are awarded to Appellant and against Respondents; (e) That Plaintiff is awarded cost and reasonable attorneys' fees in this action; and (f) That Appellant is awarded such other and further relief as the Court deems just and proper. Jury Demand Pursuant to Fed R. Civ. P. 38, Appellant hereby demands trial by jury on all issues.

Executed on August 7, 2015

Respectfully Submitted:



Cloris Banks Torrey pro se

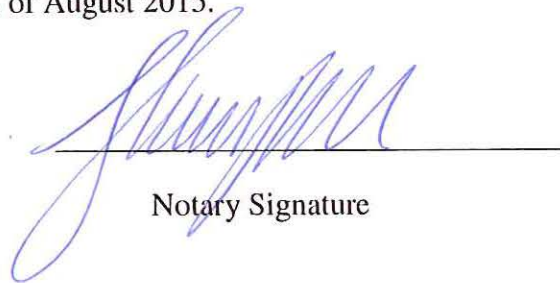
9422 Westchester Drive

St. Louis, MO. 63136

STATE OF MISSOURI)

COUNTY OF ST. LOUIS)

Cloris Banks Torrey, known by Me or made known for Me by proper identification and duly sworn Subscribed my presence this 7th day, of August 2015.


Notary Signature

My Commission Expires:

8/12/2016



APPENDIX

Notice of State of Missouri Public Service Commission File No. GC-2015-0111

Order Directing Complainants to Respond to Motion to Dismiss..... Exhibit EE

EXHIBIT EE

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Cloris and Ronald Torrey,)	
)	
v.)	<u>File No. GC-2015-0111</u>
)	
Laclede Gas Company,)	
)	
Respondent.)	

**ORDER DIRECTING COMPLAINANTS TO
RESPOND TO MOTION TO DISMISS**

Issue Date: July 28, 2015

Effective Date: July 28, 2015

The Commission held a prehearing conference on June 1, 2015. On that date Laclede Gas Company and the Staff of the Commission were present. Cloris and Ronald Torrey, Complainants, appeared and presented what is titled: "Affidavit 'Rejection of Invitation to Contract for Discovery'". In that document, among other things, Complainants challenge the subject matter jurisdiction of the Secretary of the Commission and affirmatively states that the Secretary has no subject matter jurisdiction. After handing the "Affidavit" to everyone present, Complainants left the hearing room without making any oral statement. The document was subsequently filed in the docket.

The Commission proceeded to go on the record to receive entries of appearances of those present. While on the record, Laclede informed the Commission that Complainants, who protested Laclede inspecting gas pipes, have terminated service with Laclede. Because Complainants no longer have service, Laclede points out that the need to inspect the pipes is moot. Laclede therefore moves for the dismissal of this complaint.

The Commission directed Complainants to respond to the Laclede's motion. Complainants then filed what is titled "Notice Memorandum of Exhibits Pursuant [to] Rule 3.2 Expedited Litigation." The document is captioned as being filed in U.S. District Court of the Eastern District of Missouri. Although Complainants' filing may have been prompted by the Commission's order, it is effectively nonresponsive. The Commission will afford Complainant another opportunity to respond to Laclede's motion. Again, failure to effectively respond to this Commission order may result in the complaint being dismissed.

THE COMMISSION ORDERS THAT:

1. Cloris and Ronald Torrey shall file, no later than August 7, 2015, a response to Laclede Gas Company's motion dismiss this complaint.
2. This order shall be effective when issued.

BY THE COMMISSION



A handwritten signature in cursive script that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

Kennard L. Jones, Senior Regulatory
Law Judge, by delegation of authority
pursuant to Section 386.240, RSMo 2000.


Dated at Jefferson City, Missouri,
on this 28th day of July, 2015.

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 28th day of July 2015.


Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

July 28, 2015

File/Case No. GC-2015-0111

**Missouri Public Service
Commission**
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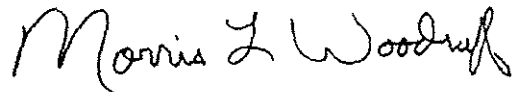
Ronald Torrey
Ronald Torrey
9422 Westchester Drive
St. Louis, MO 63136

Cloris Torrey
Cloris Torrey
9422 Westchester Drive
St. Louis, MO 63136

Laclede Gas Company
Rick E Zucker
700 Market Street, 6th Floor
St. Louis, MO 63101
rick.zucker@thelacledegroup.com

Enclosed find a certified copy of an Order or Notice Issued in the above-referenced matter(s).

Sincerely,



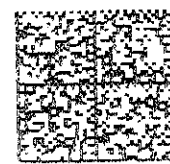
Morris L. Woodruff
Secretary

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.

Missouri Public Service Commission
Data Center
P.O. Box 360
Jefferson City, Missouri 65102-0360

MO 419-2651 (9-10)

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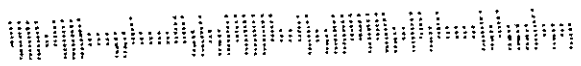


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Ronald Torrey
Ronald Torrey
9422 Westchester Drive
St. Louis, MO 63136

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CERTIFICATE OF SERVICE

I Cloris Banks Torrey certify that on August 7, 2015 I caused to be sent foregoing first class postage paid via certified U.S. Mail. On that date, I served the foregoing upon the following addressed to:

Attorney Brian C. Walsh
One Metropolitan Square
211 North Broadway Suite 3600
St. Louis, MO 63102-2750

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Jefferson City, Missouri 65102

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