

# HOLY JOE SOCIETY

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Hon. Gabe Gore  
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## Litigation Director

Robert H. Dierker, Jr.

Hon. Michael Garvin  
City Counselor  
314 City Hall  
1200 Market St.  
St. Louis, MO 63103

## Board of Directors

Re: Misconduct in Office of Sheriff Alfred Montgomery

Emily R. Perez  
Chair

Gentlemen:

Eric C. Peterson  
Vice Chair

On behalf of the Holy Joe Society, I am writing respectfully to urge you to take action to secure the ouster from office of Sheriff Alfred Montgomery of the City of St. Louis.

W. Bevis Schock  
Secretary

As an elected official of the City of St. Louis, Sheriff Montgomery is subject to the provisions of § 106.220, which states, in pertinent part:

Treasurer

Any person elected or appointed to any county, city, town or township office in this state, except such officers as may be subject to removal by impeachment, who shall fail personally to devote his time to the performance of the duties of such office, or who shall be guilty of any willful or fraudulent violation or neglect of any official duty, or who shall knowingly or willfully fail or refuse to do or perform any official act or duty which by law it is his duty to do or perform with respect to the execution or enforcement of the criminal laws of the state, shall thereby forfeit his office[.]

Joseph von Kaenel  
Member

Based on published reports, the Society submits that Sheriff Montgomery is guilty of willful or fraudulent violations or neglect of official duty, and has knowingly or willfully failed to perform official acts which by law it was his duty to perform with respect to the criminal laws of the state, in that:



**Using persuasion, education and litigation to challenge  
improper activities of Missouri local government**

1. On several occasions, as documented by published video recordings, Sheriff Montgomery caused an employee or employees of his office, during business hours, to utilize government vehicles to transport Sheriff Montgomery's children to and from school--a violation of the Sheriff's fiduciary duty to utilize the resources of his office for public purposes only, and also an incident of misuse of public resources for the personal benefit of the Sheriff.

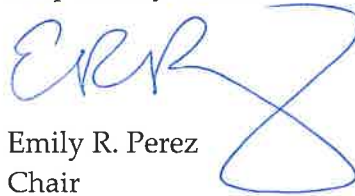
2. On or about February 14, 2025, Sheriff Montgomery personally purported to arrest the Acting Corrections Commissioner of the City of St. Louis, handcuffing her himself or directing a deputy to do so, while attempting to exercise dominion and control over the St. Louis City Justice Center, which is an agency independent of the Sheriff, thereby falsely arresting and imprisoning the Commissioner, in direct contradiction of the criminal laws of this state, which confer no general arrest powers on the Sheriff of the City of St. Louis.

3. Also during February 2025, Sheriff Montgomery violated his official duties in regard to the discipline of deputy sheriffs by forcing a regularly employed deputy to roll dice in order to avoid discharge from employment--conduct that is scarcely conceivable in a responsible elected official.

4. The Society is also informed and believes that the Sheriff has failed and refused to assign deputies sufficient to maintain courthouse security and preserve order in the courtrooms of the 22nd Circuit, and sufficient to transport and guard prisoners in need of medical care.

For the foregoing reasons, the Society submits that each of you can and should take action to secure the ouster of Sheriff Montgomery as provided by the statute above quoted. See *State ex rel. Bailey v. Gardner*, 22nd Cir. No. 2322-CC00383. If for any reason you deem your office unable to act directly, please authorize an appropriate citizen plaintiff to pursue such an action, as permitted by Sup.Ct.R. 98.02(c).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'E. R. Perez', followed by a large, stylized flourish or scribble.

Emily R. Perez  
Chair