

**IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI**

STATE OF MISSOURI, ex inf. WESLEY))	
BELL, in his official capacity))	
as Prosecuting Attorney for St. Louis))	
County,))	
)	
Relator,))	
)	
v.))	Cause No.
)	
DENNIS HANCOCK,))	
in his official capacity))	
as a member of the St. Louis))	
County Council,))	
)	
29 Sennawood Drive))	
Fenton, MO 63026))	
)	
Respondent.))	

VERIFIED PETITION IN QUO WARRANTO

COMES NOW Relator Wesley Bell, Prosecuting Attorney of St. Louis County, upon his own information, and in support of his application for judgment in quo warranto against Respondent states as follows:

PARTIES

1. Relator is the duly elected and serving Prosecuting Attorney of St. Louis County, a charter county, organized and existing under the laws of the State of Missouri, and brings this cause of action upon personal information, and to protect the public interest, pursuant to Missouri Supreme Court Rule 98.02(b)(2).

2. Respondent is the duly elected Councilman from Council District 3 of St. Louis County, Missouri.

AUTHORITY AND JURISDICTION

3. This cause of action is governed by Rule 98 of the Missouri Supreme Court Rules.

4. Relator is authorized by Rule 98.02(b)(2) to bring this action upon personal information.

5. All acts, conduct, and occurrences set forth herein occurred within St. Louis County, Missouri.

6. This Court has jurisdiction over this matter pursuant to Article VII, Section 4 and Article V, Section 14 of the Missouri Constitution.

COUNT 1 - NEPOTISM

7. Article VII, Section 6 of the Missouri Constitution provides,

Any public officer or employee in this state who, by virtue of his office or employment, names or appoints to public office or employment any relative within the fourth degree, by consanguinity or affinity, shall thereby forfeit his office or employment.

8. Under County Ordinance 201.070, Councilmembers may appoint one staff member who directly reports to them and is not a member of the merit hiring process (historically known as patronage positions.) (See Petition Exhibit 1: County Ordinance 201.070.)

9. In August of 2024, Councilman Hancock appointed Hollie Galati as his administrative assistant. (See Petition Exhibit 2 Hancock 8-1-2024 email appointing Galati; and Petition Exhibit 2a updated Hancock email identifying Galati's start date.)

10. Councilman Hancock directed Diann Valenti to hire Hollie Galati, his stepdaughter. (See Petition Exhibit 2: Hancock 8-1-2024 email appointing Galati; and Petition Exhibit 3: 8.14.24 Employment Letter to Galati.)

11. Ms. Galati began her employment on August 19, 2024, performing the duties of Councilman Hancock's administrative assistant, with a salary of \$51,888/year or \$24.88 per hour plus a vehicle allowance in the amount of \$300/month, plus additional benefits. (See Petition Exhibit 3: Employment Letter to Galati and boarding paperwork by Galati; and Petition Exhibit 4: Galati Direct Deposit Authorization, print out personnel forms and personnel records of Galati.)

12. On or about August 19, 2024, Ms. Galati completed employment paperwork accepting her salary, job duties and benefits, including direct deposit, garage parking passes paid for from her paycheck and employee benefits effective October 1, 2024. (See Petition Exhibit 4: Galati direct deposit authorization forms with cancelled checks and Employee Detail Records Screenshots; Petition Exhibit 5: Galati garage parking pass application and paycheck payment information; Petition Exhibit 6: Galati email on benefits; and Petition Exhibit 7: email reflecting Galati's phone number at the St. Louis County Council and Galati's St. Louis County Email address; Exhibit 32: County Treasurer direct deposit to Hollie Galati employee number 14923 for employment – payment of \$1,182.47.)

13. Ms. Galati began her employment on August 19, 2024, was assigned St. Louis County Employee Number 14923 as a non-merit employee. (See Petition Exhibit 3: Employment Letter to Galati and onboarding paperwork by Galati; Petition Exhibit 4:

Galati direct deposit authorization forms with cancelled checks and Employee Detail Records Screenshots.)

14. Ms. Galati assumed the duties of Councilman Hancock's administrative assistant. These duties included answering emails, constituent support and services, answering phone calls, and attending St. Louis County Council meetings with Councilman Hancock. (*See* Petition Exhibit 8: Sample emails from Galati to and from constituents dated between August 19 and August 27, 2024; Exhibit 9: Emails reflecting telephone communications handled by Galati; Exhibit 10: email from Galati to fellow administrative assistant on her first day; and Exhibit 11: Photographs of Galati attending Council meetings as assistants to Councilman Hancock on August 20, 2024.)

15. Ms. Galati served at the pleasure of Councilman Hancock. (*See* Petition Exhibit 1 County Ordinance; and Petition Exhibit 2: Hancock emails.)

16. Ms. Galati is a relative of Councilman Hancock within the fourth degree, by consanguinity or affinity. (*See* Petition Exhibit 12: birth certificate of Hollie Johnson *nee* Hollie Galati; and Petition Exhibit 13: Marriage Certificate of Dennis Hancock and Christine Hancock Dated 1996.)

17. Councilman Hancock has acknowledged he is the stepparent of Hollie Galati, and Hollie Galati acknowledges Councilman Hancock as her stepfather. (*See* Petition Exhibit 14: Facebook post of Hollie Galati.)

18. Councilman Hancock and his wife Christine Hancock acknowledge their marital status and the parenthood relationship to Hollie Galati in public documents, including in a municipal newsletter, on social media, in family obituaries, and in the deed

to their property. (See Petition Exhibit 15: municipal newsletter; Petition Exhibit 16: obituaries; and Petition Exhibit 17: deed to Hancock residence.)

19. The Missouri Constitutional prohibition of government officials naming or appointing relatives to positions includes both children and stepchildren. (See Petition Exhibit 18: Missouri Ethics Commission Chart on family degrees constituting nepotism.)

20. The Constitutional provision providing a forfeiture of office when a public officer names or appoints to public office or employment any relative within the fourth degree by consanguinity or affinity is self-executing. See State ex inf. Roberts v. Buckley, 533 S.W.2d 551 (Mo. 1976). (See Petition Exhibit 18: Missouri Ethics Chart and information on family degrees constituting nepotism.)

21. The Constitutional provision providing a forfeiture of office when a public officer names or appoints any relative within the fourth degree of consanguinity or affinity to public office or employment does not exempt those officials who rescind, even promptly, such an appointment. See State ex rel. Nixon v. Wakeman, 271 S.W.3d 28, 30 (Mo. App. W.D. 2008).

22. Ignorance of the law or lack of knowledge as to the illegality of the act is not a defense to an action in quo warranto for nepotism. State ex inf. Atty. Gen. v. Shull, 887 S.W.2d 397, 401 (Mo. banc 1994).

23. Allegations that the respondent in question is being selectively prosecuted while other elected officials have committed the same act(s) and are not also being sued for ouster are not a defense to a civil action in quo warranto for

nepotism. *Roorda v. City of Arnold* 142 S.W.3d 786, 798 (Mo. Ct of App. W. D. 2004) (citing *State v. Shull* 887 S.W.2d at 403).

24. An allegation that improper activity/appointment was not the result of the conduct of the Official alone or that the Official did not act alone in appointing the relative is not a defense to a request for ouster due to nepotism. *State ex inf. Graham v. Hurley*, 540 S.W.2d 20, 25 (Mo. banc 1976). (See also *State v. Shull*, 887 S.W.2d at 400.)

25. The suggestion that the appointed employee or relative was not paid or volunteered their time or services is not a defense to an action in quo warranto for nepotism. *State v. Shull*, 887 S.W.2d 397, 400-401.

26. The suggestion that the appointment, contract or employment was of a very short duration is not a defense to an action in quo warranto for nepotism. *State v. Shull*, 887 S.W.2d 397, 400-401 (See also *State v. Rhoads*, 399 S.W.3d 905, 907 n.1 (Mo. Ct. Apo. W. D. 2013).

27. The suggestion that the elected official made a simple mistake and took steps to correct the action is not a defense to an action in quo warranto for nepotism. *State v. Shull*, 887 S.W.2d 397, 400-401.

28. Accordingly, effective August 19, 2024, Councilman Hancock forfeited his position as a member of the St. Louis County Council.

29. Quo warranto is the mechanism by which to enforce the penalty required by the Missouri Constitution. State v. Shull at 400.

COUNT 2 – OFFICIAL MISCONDUCT TO HIDE NEPOTISM

30. On August 27, 2024, around 8:30 am in a recorded telephone conversation between Witness 1 and Councilman Hancock, Councilman Hancock admitted that he appointed his stepdaughter, Hollie Galati.

31. During the August 27, 2024 call, Councilman Hancock asked Witness 1 whether it would solve the situation if his stepdaughter Hollie Galati resigned and was informed by Witness 1 that nepotism cannot be cured by resignation.

32. The August 27, 2024 call between Councilman Hancock and Witness 1 was recorded and witnessed by Witness 2.

33. Shortly after the August 27, 2024 call, various St. Louis Council administrative staff members began emailing other county employees to alter the employment status and records of Hollie Galati.

34. Diann Valenti, Council Administrative Director/County Clerk, works for the Councilmembers and helps administer the daily business of the Council and is the daily supervisor of the Councilmembers' appointed assistants. (See Petition Exhibit 20: Email from Diann Valenti to the administrative assistants about Council Agendas)

35. Regardless of which St. Louis County agency or department hires the employee, St. Louis County centralizes all personnel matters such as onboarding and

ongoing employee needs through the Personnel Department. The Personnel Department uses an electronic dashboard type ticketing system where data and requests are entered by various departments or agencies when they hire an individual. The data is then distributed as requests or messages to staff in multiple departments that help aid some facet of the onboarding process of the County. When Councilman Hancock appointed Hollie Galati, Council staff members Diann Valenti and Adriene Jones entered Galati's information into the electronic personnel system, and she was assigned an employee number 14923. (*See* Petition Exhibit 19: Personnel Ticketing System Image #78371 (Hiring of Hollie Galati) Copy from Witness 3; and Exhibit 32: County Treasurer direct deposit to Hollie Galati employee number 14923 for employment – payment of \$1,182.47.)

36. On August 27, 2024, after the call between Councilman Hancock and Witness 1, Council County Clerk Diann Valenti, acting with others, began entering data in fields in the ticketing system trying to switch Galati's status from that of "new hire" to "rejected" and in some instances sent individuals emails asserting that Galati, resigned, was only a volunteer or never started. (*See* Petition Exhibit 21: Emails between Valenti and other county employees; and Petition Exhibit 26: Emails between Valenti and County employees about Galati working one shift.)

37. On August 27, 2024, a copy of the State's original petition in quo warranto was sent as a courtesy copy to the St. Louis County Council members and Diann Valenti at 10:32 am. Valenti forwarded the email to Councilman Hancock at 10:49 am, which he

in turn forwarded to Lobbyist¹ at 10:56 am. (*See Exhibit 24: Emails from Valenti, to Hancock to Lobbyist.*)

38. Witness 4 is a government employee with St. Louis County and one of the employees responsible for helping employees of St. Louis County get paid.

39. On August 27, 2024, around 10:11 am, Diann Valenti sent emails to Witness 4 asking them to call Valenti urgently and an email exchange occurred. (*See Petition Exhibit 22: Emails between Valenti and Witness 4.*)

40. Ms. Valenti, having made her changes of Galati from a “new hire” to “rejected” in the ticketing and personal systems, asked Witness 4 to change fields in the personnel electronic ticketing, employee action data page and messaging system. Ms. Valenti wanted a screenshot of the data system reflecting information that Ms. Valenti knew to be false, namely that Ms. Galati had rejected employment and was never employed at St. Louis County. Witness 4 was unaware the information was false. Witness 4 began making changes to the data fields and ticketing system and, at Galati’s request, took screenshots of the changes. Witness 4 then sent the screenshots of the false information to Diann Valenti. (*See Petition Exhibit 22: Emails between Valenti and Witness 4.*)

41. Diann Valenti then forwarded the inauthentic information screenshot to Councilman Hancock. (*See Petition Exhibit 22: Emails between Valenti and Witness 4;*

¹ The State is not identifying the Lobbyist as it is unknown whether they knew that some of the later information as to government records supplied by Hancock and Valenti, was incorrect and/or false. The Lobbyist is registered for a few organizations in St. Louis County and doing business with St. Louis County government.

and Exhibit 23: Email from Witness 4 to Valenti at 11:01, forwarded to Hancock at 11:04, and finally forwarded to Lobbyist dated August 27, 2024, at 11:05.)

42. Councilman Hancock attempted to create the false impression in the public that Councilman Hancock did not commit nepotism. When he forwarded, using his county email address, the screenshot to a lobbyist (Lobbyist)², Lobbyist then posted the screenshot on their social media as public “proof” that Ms. Galati did not work for St. Louis County. (See Exhibit 23: Email from Witness 4 to Valenti, forwarded to Hancock, and finally forwarded to Lobbyist dated August 27, 2024, around 11:05 am; and Exhibit 25: Screenshot of “X” post on 8/27/24 11:47 by Lobbyist.)

43. Witness 3 is an employee who assists in coordinating personnel matters within St Louis County government. On August 27, 2024, multiple members of the personnel department received contact from Dianne Valenti who explained that Hollie Galati had come in for one shift and then declined the job stating she would volunteer the time.³ Personnel staff including Witness 3, after communication from Diann Valenti, initially halted the processing of Galati’s payroll and benefits. (See Exhibit 26: Emails between Valenti and County employees alleging Galati “only worked one shift”; and

² The State is not identifying the Lobbyist as it is unknown whether they knew that the information supplied by Hancock and Valenti, as to government actors and actions, individuals and litigation, was false. It is possible that Lobbyist was one of the many people misled, including multiple public servants and government officials, by Hancock and Valenti. It is unknown whether the Lobbyist fact-checked before posting the screenshot.

³ Valenti provided multiple different explanations as to Hollie Galati’s status to different county employees from August 27 to September 11. The explanations ranged from she was his stepdaughter-in-law to she never started, and she worked one shift to she volunteered her time.

Petition Exhibit 27: Emails with County employees' response to Valenti's effort to change Galati's statistic.)

44. Witness 3, and his staff, consulted and the county counselor and learned that since Galati worked any hours, under the Fair Labor Standards Act, Galati had to be paid for the hours she worked. At Witness 3's direction, despite requests from Valenti, Galati's paperwork and payroll was processed as required by the law. (See Petition Exhibit 27: Emails with County employees' responses to Valenti's effort to change Galati's statistic.)

45. Hollie Galati's direct deposit request was processed, and she was paid. (See Petition Exhibit 32 – County Treasurer direct deposit to Hollie Galati employee number 14923 for employment – payment of \$1,182.47.)

46. Councilman Hancock represented to the public that Hollie Galati was never paid. (See Petition Exhibit 28: Statement of Councilman Hancock.)

47. On September 19, 2024, St. Louis County employees in payroll received a certified letter from Hollie Galati alleging she never worked in St. Louis County and that she never gave permission to St. Louis County employees to deposit money in her account. Galati demanded that St. Louis County reverse its direct deposit. (See Petition Exhibit 30: Galati letter.)

48. Witness 3 and multiple County employees conferred on Galati's statements and concluded she did, in fact, work and that, under the law, they could not change the check or money involved. (See Petition Councilman Exhibit 31: 9.18.24 emails of County employees.)

WHEREFORE, because of the potential for additional misconduct as to documentation and/or as to official records and to prevent potential retaliation against employees who cooperated with investigations, Relator respectfully requests a preliminary order of quo warranto, as well as, for a permanent writ of quo warranto against Respondent, ordering that Respondent Councilman Hancock is ousted from his position as Council member for the St. Louis County 3rd Council district, and a specific finding that Dennis Hancock forfeited said position effective August 19, 2024; and for such other and further relief as this Court deems just and proper.

WESLEY BELL
PROSECUTING ATTORNEY

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(314) 615-2600

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

On this ___ day of _____, 2024, before me appeared _____, to me personally known, who being by me duly sworn on his oath, does state that the statements made in this Verified in Quo Warranto are true and correct to the best of his knowledge and belief.

WHEREFORE, I hereto set my hand and affix my official seal in the County and State aforesaid, the day and year last-above written.

Notary Public

MY COMMISSION EXPIRES