

IN THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI

In Re the Marriage of:
Sheena E. Greitens and
Eric R. Greitens

SHEENA E. GREITENS,
Petitioner,

v.

ERIC. R. GREITENS,
Respondent.

Case No. 20BA-FC00579

**PETITIONER’S AFFIDAVIT IN SUPPORT OF FIRST AMENDED MOTION FOR
APPROPRIATE ORDER PURSUANT TO UCCJEA**

COMES NOW Petitioner and in support of her Motion states as follows:

RSMo §452.770 provides that: “A court of this State which has jurisdiction under this [Act] to make a child-custody determination may decline to exercise its jurisdiction at any time if it determines that it is an inconvenient forum under the circumstances and that a court of another State is a more appropriate forum. The issue of inconvenient forum may be raised upon motion of a party, the court's own motion, or request of another court.” In reaching its decision, §452.770(b) requires that the court allow the parties to submit information and to consider all relevant factors including the following specific factors:

- (1) Whether domestic violence has occurred and is likely to continue in the future and which state could best protect the parties and the child;
- (2) The length of time the child has resided outside this state;
- (3) The distance between the court in this state and the court in the state that would assume jurisdiction;
- (4) The relative financial circumstances of the parties;

2. Our children have continuously resided in Texas since July of 2020 and Texas is the children's home. Since July, 2020, Joshua and Jacob have spent the majority of their time (~70%) in Texas. From July to December of 2020, our children spent 111 days in Texas with me, and an additional 7 days in Texas with Eric. During that same time period, our children spent 43 days in Missouri with Eric and one day in Missouri with me. During the calendar year 2021, our children spent 220 days in Texas with me and an additional 15 days in Texas with Eric. During 2021, our children spent 89 days in Missouri; they also spent 23 days visiting with Eric in Washington, D.C., California, Arizona, and Illinois. Our children have not visited with Eric in Missouri since early January, 2022. One visit was missed due to the children being exposed to COVID. Their other visits with Eric have occurred in February in Florida, at Eric's request, and in March in California - also at Eric's request.
3. Eric has an ownership interest in Axiom Space, which has its principal place of business in Texas at 1290 Hercules Avenue, Houston, TX. He also routinely travels extensively outside of Missouri for campaign/political purposes, including to Texas. In the fall of 2021, for example, Eric traveled to Arizona, Texas, Nevada, Florida, and New York.
4. Eric has, at times since July 2020, maintained a residence outside of Missouri that he described to me as "his home," at 236 E. St NE in Washington, D.C. He was also employed for a time as a host for a show on the T.V. network Real America's Voice, filmed in Washington, D.C.
5. I am a tenured associate professor at the University of Texas at Austin, and I am required to be physically present on campus to perform my job duties as a professor. Conversely, Eric routinely travels for fundraising and campaign purposes, and has expressed in correspondence to me that he is in a position of "financial abundance." The costs of travel to implement the

parenting plan have been and are significantly higher than we anticipated when the Judgment was entered previously; given this and our comparative financial circumstances, the cost for me to litigate in Missouri is much more burdensome to me than for Eric to litigate in Texas – a place Eric has visited for his chosen vocation and a place to which it was anticipated he would travel and stay for purposes of visitation with his children. I have already had to take substantial time off work in order to facilitate visitation between Eric and our children, including transporting them to Florida and California, and I cannot afford the additional time or expense to travel to and from Missouri for purposes of family court matters.

6. I am cognizant that RSMo §452.770(2)(1), in part, requires the Court to consider whether domestic violence has occurred. It has, and I firmly believe that the State of Texas is better situated to protect me and/or our children. Prior to our divorce, during an argument in late April 2018, Eric knocked me down and confiscated my cell phone, wallet, and keys so that I was unable to call for help or extricate myself and our children from our home at Innsbrook, Missouri. When my mother later confronted him about this, he told her that he did so to prevent me from doing anything that might damage his political career. In early June 2018, I became afraid for my safety and that of our children at our home, which was fairly isolated, due to Eric's unstable and coercive behavior. This behavior included physical violence toward our children, such as cuffing our then three-year-old son across the face at the dinner table in front of me and yanking him around by his hair.

Eric's behavior also included threats in order to coerce me to do or to refrain from doing or saying certain things. After Eric admitted to me in late January 2021 that he had taken the photo that resulted in the invasion of privacy charge, he threatened that I would be exposed to legal

jeopardy if I ever disclosed that fact to anyone, even family members or a therapist. Because of the reach of his influence in Missouri, I believed him, which had the consequence of isolating me from many sources of outside support as his threats escalated and my concerns for my safety and that of my children grew.

In the spring and early summer of 2018, Eric repeatedly threatened to kill himself unless I provided specific public political support to him; multiple people other than myself were worried enough to intervene to limit Eric's access to firearms on at least three separate occasions, in February, April, and May 2018. As I became afraid of the escalation of physical violence in early June 2018, I begged Eric to tell me where his firearm was -- one that he had purchased in January 2018 and subsequently concealed from me. He refused, saying that I was not being sufficiently "cooperative." I started sleeping in my children's room simply to try to keep them safe.

After I attempted to seek help from a trained therapist, Eric ordered me -- at a time when I was not with the children but Eric was, a fact that he reminded me of -- to destroy the emails I had sent to our therapist, in which I had sought our therapist's help regarding Eric's escalating behavior. Eric threatened to accuse me of child abuse if I did not delete the emails and also convince the therapist to delete them. In the same call, he accused me of providing information both to the prosecutors who were investigating him and to the *St. Louis Post-Dispatch*, and called me "hateful, disgusting, nasty, vicious.... a lying bitch." The therapist told both of us at that time, "I'm at the limits of my effectiveness here."

Several days after that, I tried to leave and take the children to my parents' house, out of continued fear for our safety. When I told Eric about my plans, he threatened to come to the airport and have me arrested for kidnapping and child abuse, saying that because of his authority as a

former Governor who had supported law enforcement, the police would support him and not believe me, and I would lose our children.

In November 2019, Joshua came home from a visit with Eric with a swollen face, bleeding gums, and loose tooth. He said Dad had hit him; however, Eric said they were roughhousing and it had been an accident. Due to the trauma, the tooth died, eventually abscessed, and had to be surgically removed in May 2020.

In early 2020, after I told Eric of my intention to accept a tenured position at the University of Texas and to pursue an agreement to allow me to move with the children to Austin for their continued protection and privacy, Eric threatened to use his political influence to get my job offer revoked, threatened to turn me in for "stealing money from our joint account," and threatened to report me for "lying to the federal government," all of which were false accusations. He has referred to me as an "enemy," and he continued to threaten to use his influence with law enforcement, as someone who had appointed judges in the State, and as someone with access to state officials and public platforms, to promulgate false accusations of abuse against me and to influence the court process in Missouri to his benefit and my detriment.

7. The disintegration of our marriage, following Eric's admitted infidelity and credible allegations of Eric's non-consensual sexual behavior with his hairstylist, was a public spectacle of particular interest in the State of Missouri, which caused me significant emotional distress and exposed to public discussion many painful personal matters. Through that excruciating process, I saw Eric seek to destroy the credibility of the victim in the invasion of privacy case, using the unique leverage he had in Missouri to do so. This history made his threats against me seem all the more credible. Now, I am watching him use his political influence and

public platform to make these claims again, as this nightmare is back in public view during pending legal proceedings in the City of St. Louis.

Eric has continued to publicly make false, untrue, and misleading claims about those issues, and has turned them into a centerpiece of his campaign for public office. He has also specifically made false claims about our children, saying that he resigned because of the “tremendous pressure that was on my kids.” (The children were one and three when the graphic allegations about their father’s sexual misconduct erupted into public view; they were and are unaware of the scandal, and I would like them to remain so until they are older.) I have privately entreated Eric to stop introducing false and misleading information about our marriage and divorce into the public in his quest for political office, due to its adverse impact on our children and on my job as a professor of public policy. Eric has refused and called my request “emotional abuse.” Since his campaign began, I have had to watch him lie and mislead the public about our marriage and my own life repeatedly, while unable -- because of his past threats -- even to correct statements that Eric misled me into making in his defense in January of 2018. I have repeatedly declined media requests to speak about my own experience, even to correct Eric’s untruths, both because I wanted to protect our children, and because I was afraid of what Eric would do.

Now that Eric is a candidate for federal office, the public interest in the my life, my relationship with Eric and the breakdown thereof, and the existence of issues of custody between Eric and me is being re-kindled and brought back into central public discussion in the State of Missouri -- heightening the risk that our young children will be exposed to painful and age-inappropriate information about the dissolution of their parents’ marriage during Eric’s campaign. It also heightens the risks to me, as someone who Eric will likely (and by his own words already does) perceive as his adversary and “enemy” -- risks of attacks on my character as an

individual, as a mother, and as a professional outside the courtroom. These risks exist because Eric has a unique and unfettered ability in Missouri to widely broadcast and publicize his message with the support of his political allies. The personal and professional impact of such attacks would be far diminished in Texas.

The implication of Eric's disproportionate power and control which can be exercised in particular in Missouri, as a result of his notoriety; the precedent he has set of trying to destroy the credibility of someone with whom he is engaged in adverse litigation by leveraging his public platform and influence in Missouri; his invocation of his past ability to influence Missouri law enforcement, appoint Missouri judicial personnel (including in Boone County), and effect Missouri legislation and policy; the past success he has had in being able to exercise his power and control to his benefit in litigation and otherwise in Missouri, without real consequence or interference; and the potential that he now may be able effect national legislation, policy, and appointments, through his representation of Missouri are all extremely intimidating facts to me as I contemplate this case being litigated in Missouri. The weight of these facts and the intimidation they cause is mitigated by litigating in Texas because the reach of his power and influence is significantly less in that state.

8. Neither Eric nor I reside in Boone County, Missouri, and the children do not reside in Boone County, Missouri. In the event that Eric is successful in his bid to represent Missouri in the U.S. Senate, he will reside primarily in Washington, D.C. Thus, neither me, nor Eric, nor the children will be spending significant time in the State of Missouri, and all will have to take time away from the children and their jobs to seek relief from a court.

9. There has never been a court appearance in Missouri at which either Eric of I have testified, and this Court has no specific familiarity with Eric, myself, or our children hereto, the specific historical facts of this case, or the family history of this case.

COMES NOW Sheena E. Greitens, being of lawful age and after being duly sworn, states that she has read the foregoing Affidavit and hereby swears and affirms that the facts stated herein are true and correct to the best of her present knowledge and belief.

S. Greitens

Sheena E. Greitens

15 March 2022

Date

Subscribed and sworn before me on this 15 day of March, 2022

Leslie P. Kim

NOTARY PUBLIC

