

**IN THE HOUSE OF REPRESENTATIVES  
STATE OF MISSOURI**

STEPHANOS FREEMAN,	)
	)
Petitioner,	)
	)
	)
v.	)
	)
JEREMY DEAN,	)
	)
Respondent.	)

**VERIFIED PETITION**

COMES NOW Petitioner Stephanos Freeman and submits this Verified Petition in the above-captioned matter pursuant to Mo. Rev. Stat. Section 115.565 to the Speaker of the House of the Missouri House of Representatives. For his Verified Petition, Petitioner states as follows:

**PARTIES**

1. Petitioner was the Republican candidate for House District 132 in the general election that was held on November 5, 2024.
2. Respondent was the Democrat candidate for House District 132 in the general election that was held on November 5, 2024.

**JURISDICTION AND VENUE**

3. This petition seeks an order disqualifying Respondent Jeremy Dean from serving in the Missouri House of Representatives as a representative of District 132 due to his failure to meet the residency requirements set forth in Article III, Section IV of the Missouri Constitution.

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Revised Statutes Section 115.563 provides that any contested election for the office of state representative shall be heard and determined by the state house of representatives.

4. Pursuant to Mo. Rev. Stat. Section 115.565, the house of representatives has exclusive jurisdiction over election contests based on the unadjudicated qualifications of a candidate for office.

5. This contest has not been previously adjudicated, and therefore the state house of representatives has jurisdiction over the contest.

#### FACTS RELEVANT TO THE PETITION

6. The Missouri Constitution requires that each representative, “before the day of his election,” be a “resident of the...district which he is chosen to represent for one year.” Mo. Const. Art. III, §4.

7. In order to be qualified for the office of Representative of District 132, Jeremy Dean was required to have resided in District 132 since November 5, 2023.

8. On September 10, 2024, Respondent informed Petitioner that he has not lived in District 132 since November 5, 2023 (which would be for a full year prior to the upcoming election).

9. This conversation on September 10, 2024, was the first time Petitioner learned that Respondent was not qualified for the position due to failure to meet residency requirements set forth in the Missouri Constitution.

10. Upon learning this information on September 10, 2024, Petitioner then discovered that Respondent has utilized many residential addresses within the one-year period preceding the upcoming November 5, 2024 general election.

11. According to publicly available property tax records for calendar year 2023, Respondent paid personal property taxes on his 2016 Nissan a few days late – on January 3, 2024. At that time, he reported his home address as 515 W Whiteside St., Springfield, MO 65807. This address is outside of District 132. *See Exhibit A, attached hereto.*

12. Based on information and belief, Respondent has used an address on Cresthaven in Springfield, MO, outside of District 132, at various times before the one-year period prior to the upcoming election, and likely was still living there and renting the residence during the one-year period prior to the election.

13. When Respondent filed his Missouri Ethics Commission registration to form his campaign committee on November 1, 2023, he stated that his address is on Market Avenue in Springfield, MO, which is outside of District 132. *See Exhibit B, attached hereto.*

14. Respondent changed his registration for his campaign committee on December 3, 2024 to an address inside District 132: 914 Central, Springfield, MO. He also changed his personal address to the same Central address as of that same date.

15. The property at 914 Central is located in District 132, but Respondent does not claim to reside there until December 3, 2023, which is less than one year prior to the election. *See Exhibit C, attached hereto.*

16. Based on information and belief, and according to publicly available property records, the property at 914 Central is owned by Respondent's employer, a tax-exempt non-profit 501(c)(3) organization, the Drew Lewis Foundation, Inc.

17. Drew Lewis Foundation had not been paying property taxes on its house at 914 Central even though it was not being used for non-profit purposes, as Respondent Jeremy Dean claims he started living in it AFTER November 5, 2023.

18. Based on information and belief, the non-profit Drew Lewis Foundation could not have permitted Respondent to live in the house located at 914 Central, and is further prohibited from allowing it to be used or using it for a campaign committee or for any campaign purposes at all.

19. Regardless, based on information and belief, Respondent has at least not lived at 914 Central in the Drew Lewis Foundation's house for a full year prior to the election.

20. In October 2024, after Petitioner raised the issue of the tax-free status of Respondent's Campaign Committee office, Respondent filed an amended statement of committee organization with the Missouri Ethics Commission, changing the address of his campaign committee to a p.o. box. *See* Exhibit D, attached hereto.

#### COUNT I

21. Petitioner restates and realleges the allegations contained in paragraphs 1-21.

22. Petitioner challenges the qualifications of Respondent to seek election for House of Representatives for District 132.

23. Petitioner will produce evidence that Respondent failed to meet the residency requirement of the Missouri Constitution and is therefore disqualified from holding office.


24. Petitioner will produce evidence that Respondent failed to pay taxes and is therefore disqualified from holding office.

WHEREFORE, Petitioner prays leave to produce evidence that Respondent did not reside in District 132 for a full year prior to November 5, 2024 and Petitioner further seeks an order from the appropriate court declaring Respondent therefore unqualified for the office of House of Representatives for District 132, and for such other and further relief this court deems just and proper.

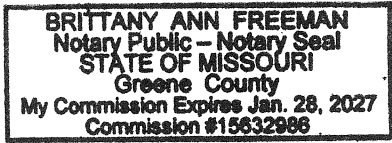
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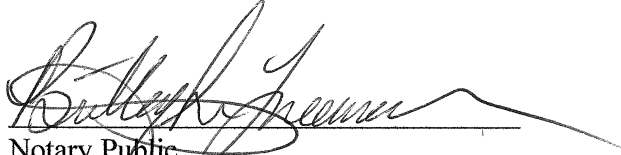
STATE OF MO. )  
COUNTY OF Greene )

I, Stephanos Freeman, being duly sworn upon oath state that I have read the foregoing affidavit and know the contents thereof, and the facts set forth therein are true to the best of my knowledge and belief.

  
\_\_\_\_\_  
Stephanos Freeman

2024. Subscribed and sworn to before me, a Notary Public the 12<sup>th</sup> day of December



  
\_\_\_\_\_  
Notary Public

Respectfully submitted,

STEPHANOS FREEMAN

By: /s/ Stephanos Freeman  
Stephanos Freeman

Address: 1707 W. Lee St.  
Springfield, Mo 65803

Date: 12-12-24