



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY
ATTORNEY GENERAL

JEFFERSON CITY

65102

P.O. Box 899
(573) 751-3321

In the Matter of:

CID NO. 25-37

Date: June 27, 2025

Grain Belt Express, LLC

INVESTIGATIVE DEMAND

THE ATTORNEY GENERAL TO:

Served: *UPS*

**Grain Belt Express, LLC
406 N. Main St. Ste. B
Rolla, MO 65401**

**1 South Wacker Drive
Suite 1800
Chicago, IL 60606**

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether **Grain Belt Express (Subject)** has engaged in or is engaging in practices declared unlawful by § 407.020, RSMo.

The investigation will inquire into the statements and activities of **Subject** in connection with its transmission line project in Missouri.

The Attorney General has reason to believe that the **Subject** has used deception, fraud, false promise, misrepresentation, unfair practice or the concealment, suppression, or omission of material fact in connection with its statements and actions concerning its transmission line project in the State of Missouri, § 407.020, RSMo. Independently, the Attorney General also believes it to be in the public interest to investigate whether such acts have occurred.

The Attorney General believes you have information, documentary material or physical evidence relevant to the above-mentioned conduct.

DEFINITIONS

As used in this Demand, the following terms have the meanings described below:

“Communication” means any expression, statement, conveyance, or dissemination of any words, thoughts, statements, ideas, or information regardless of form, format, or kind. “Communication” includes but is not limited to oral or written communications of any kind, such as telephone conversations, discussions, meetings, notes, letters, agreements, emails or other electronic communications, facsimiles, and other forms of written or oral exchange that are recorded in any way, including video recordings, audio recordings, written notes, or otherwise. Any “Communication” that also falls within the definition of “Document” shall constitute both a Document and a Communication for purposes of this civil investigative demand.

“Document” means all written, printed, typed, and recorded matter of every kind and description, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, “documents” include all agreements, contracts, correspondence and other communications including notes, memoranda and marginal notations, records, reports, books, manuals, instructions, statistical data and data compilations, drafts, charts, graphs and tables, bills, statements and invoices, advertising, surveys, transcripts, microfilm and microfiche, electronic records that can be reproduced in paper form, recordings, film, tapes, photographs, electronic mail and Web pages, and all other computer-generated, computer-stored, or electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

“Identify”, when used with respect to a **person or entity**, means information sufficient to allow employees of the Attorney General to ascertain the name, address, telephone number, and if not a natural person, the contact person of the entity or facility to be identified, as well as the relationship of that person or entity to you.

“Identify”, when used with respect to a **fact or event**, means information sufficient to allow employees of the Attorney General to ascertain the fact or event with reasonable particularity, and to identify each person

believed to have knowledge with respect to the fact or event and each document that refers or relates to the fact or event.

“Relating to”, “related to”, “relate to” means to be relevant in any way to the subject matter in question, including without limitation all information that directly or indirectly contains, records, reflects, summarizes, evaluates, refers to, is pertinent to, indicates, comments upon, or discusses the subject matter; or that states the background of, or was the basis for, or that records, evaluates, comments, was referred to, relied upon, utilized, generated, transmitted, or received in arriving at any conclusion, opinion, estimate, position, decision, belief, policy, practice, course of business, course of conduct, procedure, or assertion concerning the subject matter.

“You”, including your, means Grain Belt Express, LLC, subsidiaries, partnerships, or any other entities related to Grain Belt Express.

DEMAND FOR DOCUMENTS AND INFORMATION

Time Period of Request: Unless specifically stated otherwise, please restrict your search for all information and documents requested below to the period from January 1, 2016, to the present.

Document Identification: For each Demand for Information and Documents, you shall type the Demand and type Your corresponding response. You should identify—by Bates range, or by file names and locations—which Documents are responsive to each Demand. If You do not know the answer to a Demand, You shall identify in Your response the individual or business entity that has the answer to the Demand for Information. The document on which You type each Demand and Your corresponding response shall be executed by You before a Notary Public.

Privileged Information: No demand seeks privileged information. If You believe that You have responsive materials that are privileged, please produce a privilege log that identifies each document or communication, the basis for withholding the document, the reason withheld, and sufficient information to permit the Attorney General’s Office to assess the applicability of the privilege and/or the work-product doctrine.

No Redaction: All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may

contain information not explicitly requested, or might include interim or final editions of a document.

Sensitive Personally Identifiable Information: If any material called for by these requests contains the sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

Continuing Request: All document requests are continuing in nature so as to require supplementary documents if you obtain additional responsive documents.

Demand is hereby made upon you, under the authority granted by Section 407.040, RSMo, to produce in person or via mail as set forth below , the following documentary material that may be in your possession, custody or control, and permit the inspection and copying thereof:

1. Documents sufficient to identify Your employee organizational chart.
2. Documents sufficient to identify Your corporate structure and ownership.
3. Documents sufficient to identify all Your operational expenses in the state of Missouri.
4. All documents or communications on which You relied or are related to calculating “cost savings” to Missouri energy consumers.
5. All documents or communications on which You relied or are related to Your projects in Missouri and any Missouri emissions mandates and carbon laws or policies.
6. All documents or communications on which You relied or are related to Your projects in Missouri and any federal emissions mandates and carbon laws or policies.
7. All documents or communications on which You relied or are related to Your calculations of “economic benefit” to local Missouri job markets, including but not limited to job projections by county.

8. All documents and communications on which You relied or are related to your calculations of the “economic activity” due to construction in Missouri.
9. All promotional or marketing information provided by You from January 1, 2016 to June 27, 2025 to any individual or organization for the purpose of advertising Your transmission project in Missouri.
10. All communications with Missouri landowners related to Your transmission line project in the state.

NOTICE OF DEMAND FOR RETENTION OF RECORDS

You are hereby notified that all records, including communications, documents and things, relating to the above requests and the matters that are the subject of these requests for information are to be preserved during the pendency of this investigation. This includes, but is not limited to, all related customer records, including recordings made of customers, all related correspondence and other communications with third parties, all related documents and things received from third parties, and all internal documents and things.

COMPLIANCE

You may comply with this Investigative Demand by producing copies of the requested documents and information by regular mail or overnight delivery to **Kathryn Monroe, P.O. Box 899, Jefferson City, Missouri 65102**. The requested copies of documents and information should be received by the Office of the Attorney General **by 10:00 a.m. (Central) on July 21, 2025** and be accompanied by the attached Business Records Affidavit and Certification of Compliance.

You are advised that the Attorney General will not grant an extension of time or modification of the terms of the Demand except for good cause pursuant to the terms of Section 407.070, RSMo. Your prompt response and provision of the requested information is requested.

Your attention is respectfully called to the provisions of Section 407.080, RSMo, which makes certain acts done with the intent to avoid, evade or prevent compliance in whole or in part with any Investigative Demand served hereunder a Class A misdemeanor, which is punishable by a

fine not to exceed \$1,000.00 for individuals and \$5,000.00 for corporations, or by imprisonment for a term of not more than one year, or both a fine and imprisonment.

Please direct all questions regarding this Investigative Demand to Kathryn Monroe at (573) 751-6628 or by email to kathryn.monroe@ago.mo.gov.

Respectfully Submitted,

A handwritten signature in blue ink, consisting of several fluid, overlapping strokes that form a stylized, somewhat abstract shape.

ANDREW BAILEY
Attorney General

STATE OF _____)
) SS.
COUNTY OF _____)

BUSINESS RECORDS AFFIDAVIT AND CERTIFICATE OF COMPLIANCE

Before me, the undersigned authority, personally appeared _____, who, being by me duly sworn, deposed as follows:

My name is _____, I am of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated:

I am the custodian of the records of _____. Attached hereto are _____ pages of records from _____. These _____ pages of records are kept by _____ in the regular course of business, and it was the regular course of business of _____ for an employee or representative of _____ with knowledge of the act, event, condition, opinion, or diagnosis recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time of the act, event, condition, opinion or diagnosis. The records attached hereto are the original or exact duplicate of the original.

I further certify that all documents and information required by Civil Investigative Demand No. 25-37 which is in the possession, custody, control, or knowledge of, _____ has been submitted to the Missouri Attorney General as directed herein.

Affiant

Sworn to before me this ____ day of _____, 2025.

Notary Public
Commission Expires: