IN THE CIRCUIT COURT OF JOHNSON COUNTY, MISSOURI
AT WARRENSBURG
JUVENILE DIVISION

In the Interest of: Enzo Anziano,

A juvenile under the age of eighteen years.

Case No. 24JO-JU00074

FATHER'S THIRD REQUESTS FOR ADMISSION TO MISSOURI DEPARTMENT OF SOCIAL SERVICES, CHILDREN'S DIVISION

A FAILURE TO TIMELY RESPOND TO REQUESTS FOR ADMISSIONS IN COMPLIANCE WITH RULE 59.01 SHALL RESULT IN EACH MATTER BEING ADMITTED BY YOU AND NOT SUBJECT TO FURTHER DISPUTE.

To: Missouri Department of Social Services, Children's Division ("Children's Division"), through its legal counsel.

Authority and purpose. Pursuant to Missouri Supreme Court Rules 123.08(d) and 59.01, Father serves this Third Set for purposes of this pending action only. This set does not repeat Father's First Set or Father's Second Set. Those matters are already established in this action by failure to timely respond. This set is directed to the July 1, 2025 hearing position of Children's Division, the absence of a safety plan, and the character of the July 28, 2026 Social Service Plan.

DEFINITIONS

1. "Father" means Salvatore M. Anziano.

2. "Enzo" means Enzo Anziano, the juvenile in Case No. 24JO-JU00074.

3. "Children's Division" means the Missouri Department of Social Services, Children's Division, including information known or reasonably available to the Division after reasonable inquiry for purposes of responding under Rule 59.01.

4. "July 1 Hearing" means the permanency hearing held July 1, 2025 in this case before Judge Brent F. Teichman.

5. "Current SSP" means the Social Service Plan signed by Selena Howerton and Kristin M. Sanders on July 28, 2026.

6. "Safety Plan" means a written plan, other than the Current SSP, that identifies a present danger to Enzo from Father's care and states the specific condition whose completion would end out-of-home placement.

REQUEST FOR ADMISSION NO. 1

Admit that, at the July 1 Hearing, Children's Division stated that it would not be opposed to a trial home visit.

Admitted.

REQUEST FOR ADMISSION NO. 2

Admit that, at the July 1 Hearing, when asked whether the co-resident's child-abuse or CAN history was a reason she could not be around Enzo, Children's Division answered no.

Admitted.

REQUEST FOR ADMISSION NO. 3

Admit that Children's Division has not signed a Safety Plan in this case at any time after July 1, 2025.

Lacks sufficient information and therefore denies. Children's Division does not utilize safety plans as defined in this document. Safety plans are utilized to address potential safety concerns in a home to try and maintain safe placement of the child.

REQUEST FOR ADMISSION NO. 4

Admit that the Current SSP does not identify any present act, omission, or condition of Father that Children's Division contends creates a current risk of harm to Enzo if Enzo is returned to Father.

Denied. The current social service plan (SSP) indicates that Mr. Anziano has not completed the court ordered psychological evaluation and is not attending visits with his son.

REQUEST FOR ADMISSION NO. 5

Admit that Children's Division possesses no writing, created after July 1, 2025, stating that Father's compliance with court orders or with instructions of Children's Division workers is necessary to protect Enzo from a current risk of harm.

Denied. The Court orders state that the Father must comply with the Social Service Plan including services recommended and provided by Children's Division to allow for safe reunification with the Child.

REQUEST FOR ADMISSION NO. 6

Admit that, after the First Set and the Second Set were due and unanswered, Children's Division did not create the written individualized assessment or the written return-risk analysis described in those requests.

Objection: vague as to "written individualized assessment" and "written return-risk analysis." These are not documents created or maintained in the regular course of Children's Division business. Additionally, creation of these documents is not listed in the duties of Children's Division outlined in Chapters 210 and 211.

Response format. Responses shall comply with Rule 59.01(d), including quoting each request and specifically admitting, denying, objecting with stated reasons, or setting forth in detail why the responding party cannot truthfully admit or deny after reasonable inquiry.

VERIFICATION

STATE OF MISSOURI]
] **ss.**
COUNTY OF Johnson]

The undersigned, Kristin Sanders a representative of Respondent, being first duly sworn upon oath states that he/she is the authorized representative of Respondent named in the above entitled cause; that he/she has read the foregoing Answers to Interrogatories and states that the answers contained therein are true and correct to the best of his/her knowledge and belief and that he/she signed said document as his/her own free act and deed on behalf of Respondent.

Kristin Sanders

On this 28 day of October, 2026 before me, a Notary Public for the County and State aforesaid, personally appeared, Kristin Sanders, known to me to be of lawful age and known to me to be the authorized representative of Respondent named in the above entitled cause and whose name is subscribed to the Answers to Interrogatories and that he/she acknowledged that he/she executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

SHANNON BRUMFIELD
Notary Public - Notary Seal
State of Missouri
Commissioned for Johnson County
My Commission Expires: June 30, 2028
Commission Number: 24058252

Notary Public

My Commission Expires: June 30, 2028

Respectfully submitted,

DEVIN B. RODRIGUEZ
Attorney for Children's Division
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was sent via email in PDF format on this 28th day of October 2026, to:

Salvatore Anziano