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

In the Interest of: Enzo Anziano **Case No. 24JO-JU00074**
A juvenile under the age of eighteen years.

FATHER'S FIRST REQUESTS FOR ADMISSION TO JUVENILE ENZO ANZIANO, BY AND THROUGH GUARDIAN AD LITEM JOSHUA L. WISEMAN

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: Juvenile Enzo Anziano, by and through his Guardian ad Litem, Joshua L. Wiseman.

Authority and purpose. Pursuant to Missouri Supreme Court Rules 123.08(d) and 59.01, Father serves the following requests on the juvenile party, by and through the Guardian ad Litem, for purposes of this pending action only. Each request is directed to a narrow existence, action, or reliance proposition concerning whether the juvenile, through the Guardian ad Litem, has an independently identifiable post-recusal factual basis for continued supervised visitation and whether the GAL sought an expedited hearing concerning Enzo's permanency after August 11, 2026.

DEFINITIONS

1. "Father" means Salvatore M. Anziano.

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

3. "Guardian ad Litem" or "GAL" means Joshua L. Wiseman in his court-appointed capacity representing Enzo in this case.

4. "Recusal Date" means August 18, 2025, the date on which the docket entry stated that the Court recused and transferred Case No. 24JO-JU00074 to the Honorable Kaitlyn A. Roach.

5. "Post-Recusal Enzo-Specific Safety Fact" means a material fact concerning a risk of harm to Enzo from Father's care that was first learned or independently verified by or for the Juvenile through the GAL after the Recusal Date and that the Juvenile, through the GAL, actually relied upon in advocating, supporting, or maintaining continued supervised visitation.

6. "Written Post-Recusal GAL Assessment" means a written or electronically stored record created or adopted after the Recusal Date that (a) identifies a Post-Recusal Enzo-Specific Safety Fact and (b) records a determination or position that Father's visitation with Enzo should remain supervised because of that fact.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1

Admit that the Juvenile, through the GAL, possesses no Written Post-Recusal GAL Assessment.

I object to relevance and that the question is vague and ambiguous. A Post-Recusal GAL Assessment is prepared by a successor GAL after a previous GAL has recused themselves or been disqualified. I have been the only GAL appointed for the minor child and have not recused or been disqualified.

REQUEST FOR ADMISSION NO. 2

Admit that the Juvenile, through the GAL, possesses no record identifying any Post-Recusal Enzo-Specific Safety Fact.

I object to relevance as a recusal by a Judge has no bearing on the Court previously taking Jurisdiction on the minor child and the prior Judge's recusal does not require new findings for the successor Judge to keep Jurisdiction of the minor child. Additionally, the Court has overruled similar arguments made by father.

REQUEST FOR ADMISSION NO. 3

Admit that, after August 11, 2026, the GAL did not file any motion or written request asking the Court to expedite a hearing concerning Enzo's permanency.

I admit that I have not filed any motions on the underlying case from August 11, 2026 to September 1, 2026, consisting of approximately 21 days.

REQUEST FOR ADMISSION NO. 4

Admit that the Juvenile, through the GAL, is not presently relying on any Post-Recusal Enzo-Specific Safety Fact as a factual basis for continued supervised visitation.

I object to relevance and vague and ambiguous as "Post-Recusal Enzo-Specific Safety Fact" is not a legal requirement under RSMO Chapter 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.

JOSHUA L. WISEMAN (#65285)
GAL

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