

**RELATORS
PEOPLE NOT
POLITICIANS, Et Al.
PETITION FOR
PROHIBITION
EXHIBIT 5**

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS, *et al.*,)
)
 Plaintiffs,)
)
 v.) Case No. 25AC-CC07128
)
 MISSOURI SECRETARY OF STATE,)
)
 Defendant.)

INTERVENOR'S FIRST INTERROGATORIES TO PLAINTIFFS

Intervenor Put Missouri First hereby propounds the following Interrogatories to Plaintiffs People Not Politicians and Richard Von Glahn to be answered pursuant to Rule 57.01 of the Missouri Rules of Civil Procedure in the time and manner provided by law.

INSTRUCTIONS

1. These interrogatories and definitions should be construed to require answers based upon the knowledge of and information available to the responding party as well as its agents, representatives, and, unless privileged, attorneys. It is intended that the following interrogatories will not solicit any information protected by the attorney client or work product doctrine that was created by or developed by counsel for responding party after the date on which this litigation was commenced.
2. These interrogatories are continuing in character and therefore require that supplemental answers be filed seasonably if further or different information is obtained with respect to any interrogatory.
3. No part of an interrogatory should be left unanswered merely because an objection is interposed to another part of the interrogatory. If a partial or incomplete answer is provided, the responding party shall state that the answer is partial or incomplete.

4. Where a claim for privilege is asserted in objecting to any interrogatory or part thereof and information is not provided on the basis of such assertion:

A. In asserting the privilege, the responding party shall, in the objection to the interrogatory or part thereof, identify with specificity the nature of the privilege (including work product) that is being claimed;

B. The following information should be provided in the objection, if known or reasonably available:

(1) For oral communications:

(a) the name of the person making the communication and the names of the persons present while the communication was made, and, where not apparent, the relationship of the persons present to the person making the communication;

(b) the date and place of the communication; and

(c) the general subject matter of the communication.

(2) For documents:

(a) the type of document;

(b) the general subject matter of the document;

(c) the date of the document; and

(d) such other information as is sufficient to identify the document, including, where appropriate, the author, addressee, custodian, and any other recipient of the document, and where not apparent, the relationship of the author, addressee, custodian, and any other recipient to each other.

5. If the responding party elects to specify and produce business records in answer to any interrogatory, the specification shall be in sufficient detail to permit the interrogating party to locate and identify, as readily as the responding party can, the business records from which the answer may be ascertained.

6. If the responding party encounters any ambiguities when construing a question or definition, the responding party's answer shall set forth the matter deemed ambiguous and the construction used in answering.

7. If the information requested is not reasonably available to the responding party, please state what efforts the responding party made to obtain the information and from what source such information might be obtained.

8. If the information requested is not available in precisely the form requested but can be supplied in a slightly modified form, please state the information in whatever form available concerning the subject of the interrogatory.

DEFINITIONS

1. "You" and "your" means and includes People Not Politicians and/or Richard Von Glahn, as well as its representatives, agents, employees or anyone acting for or on his behalf (whether or not such individual is currently employed by or an agent of the People Not Politicians).

2. "Document" or "documents" means the original and any non-identical copies of any written, recorded, or graphic material of any kind (including, but not limited to, handwritten, printed, mimeographed, lithographed, duplicated, typed, or other graphic, photographic, electronic, or computer-generated matter) and shall include, but not be limited to, all letters, emails, telegrams, correspondence, contracts, agreements, notes, reports, memoranda, mechanical or electrical sound recordings or transcriptions thereof, memoranda of telephone or personal conversations or of meetings and conferences, minutes, studies, reports, analyses, tests, inter-office communications, ledgers, books of account, worksheets, vouchers, receipts, cancelled checks, money orders, invoices, and/or bills that are in your possession, custody, or control, or that you know to exist.

3. "Knowledge" means information derived from any source, including hearsay knowledge.

4. "And/or" means "and" and, in the alternative, "or."

5. "Relates to" and "relating to" means: constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is in any way pertinent to.

6. "Person" or "persons" shall include, without limitation, individuals, partnerships, ventures, corporations, associations, and governmental agencies or any other entity.

7. "Communication," means any exchange of words, thoughts, or ideas whether orally or in writing (whether in electronic or other form).

8. "Campaign" means the campaign and all related contributions and expenditures in support of, in any direct or indirect manner, the Sports Wagering Petition which is the subject of This Matter.

9. "Referendum" or "Referendum Petition" means 2026-R001, 2026-R002, 2026-R003, and/or 2026-R004 filed with the Missouri Secretary of State's office (attached to Plaintiff's First Amended Petition as Exhibit A).

10. "This Matter" means the above-captioned case, Case No. 25AC-CC07128, *People not Politicians v. Missouri Secretary of State* pending in the Circuit Court of Cole County, Missouri.

INTERROGATORIES

1. State the name, address and relationship to People Not Politicians of the person(s) providing answers or information for these interrogatories on your behalf.

ANSWER:

2. For each retained expert you expect to call as an expert witness at trial, state the person's name, address, occupation, place of employment and qualifications to give an opinion (if the foregoing information is available on the expert's curriculum vitae, the curriculum vitae may be attached to the interrogatory responses), the general nature of the subject matter on which the expert is expected to testify and the expert's hourly deposition fee.

ANSWER:

3. For each non-retained expert witness, including a party, you expect to call at trial who may provide expert witness testimony, state the person's name, address, and field of expertise and the opinion(s) the expert will testify to at trial.

ANSWER:

4. Identify all witnesses you intend to call at the hearing on the merits in this matter.

ANSWER:

5. What is the relationship between Richard Von Glahn and People Not Politicians?

ANSWER:

6. Identify all of the board members (name, address, dates of service) for People Not Politicians.

ANSWER:

7. Identify all of the officers (name, address, dates of service, duties) for People Not Politicians.

ANSWER:

8. What date did the Board or Officers vote to file the Petition in this matter?

ANSWER:

9. What date was the Officers of People Not Politicians delegated the authority to file the Petition in this matter?

ANSWER:

10. Identify all facts supporting your claims in Paragraph 57 of the First Amended Petition?

ANSWER:

11. Identify all facts supporting Paragraph 29 of the Joint Stipulation of Facts and Exhibits filed in this case on October 28, 2025?

ANSWER:

12. Identify all facts supporting Paragraph 32 of the Joint Stipulation of Facts and Exhibits filed in this case on October 28, 2025?

ANSWER:

13. What date was the Officers of People Not Politicians delegated the authority to file the Petition in this matter?

ANSWER:

14. Are you Circulating 2026-R001?
a. If yes, how many signatures do you claim to have obtained on 2026-R001?

ANSWER:

15. Are you Circulating 2026-R002?

a. If yes, how many signatures do you claim to have obtained on
2026-R002?

ANSWER:

16. Are you Circulating 2026-R003?

a. If yes, how many signatures do you claim to have obtained on
2026-R003?

ANSWER:

17. Are you Circulating 2026-R004?

a. If yes, how many signatures do you claim to have obtained on
2026-R004?

ANSWER:

Respectfully submitted,

ELLINGER BELL LLC

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