

**RELATORS
PEOPLE NOT
POLITICIANS, Et Al.
PETITION FOR
PROHIBITION
EXHIBIT 8**

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS, *et al.*,)
)
 Plaintiffs,)
)
 v.) Case No. 25AC-CCo7128
)
 MISSOURI SECRETARY OF STATE,)
)
 Defendant.)

**PLAINTIFFS' ANSWERS AND OBJECTIONS TO INTERVENOR'S
 FIRST INTERROGATORIES TO PLAINTIFFS**

Plaintiffs have moved to strike certain documents transmitted to their counsel by Intervenor's counsel as not complying with Rule 57. *See* Mot. to Strike. Plaintiffs have never received the documents Intervenor's counsel certified were sent. Instead, Plaintiffs' counsel received a document titled "Intervenor Put Missouri First's First Requests for Production to Plaintiffs." Without waiving objections to the service of this document, Plaintiffs provide the following responses and objections.

General Objections

In addition to the objections contained in the Motion to Strike and Motion for Protective Order, Plaintiffs object to these Interrogatories to the extent they seek information not relevant to any claim or defense in this action and not proportional to the needs of the case; are overbroad in time, scope, or subject matter; are unduly burdensome or harassing; seek information protected by the attorney-client privilege, the attorney work product doctrine, or other applicable privileges and protections, including those safeguarding confidential campaign

strategy, donor information, and the privacy of third-party voters and volunteers; purport to impose obligations beyond those provided by the Missouri Rules of Civil Procedure; seek information equally available from public sources; or call for legal conclusions, premature expert disclosures, or disclosures governed by the Court's scheduling orders.

This case concerns (1) whether the Secretary of State is authorized to reject the form of a referendum petition sample sheet because the Governor had not yet decided to sign the bill up on which the referendum is being requested at the time when the sample sheet was submitted to the Secretary; and (2) whether a proponent of a referendum petition is required to wait for an approval as to form in order to gather signatures in support of a referendum petition. See gen. Am. Pet. Discovery into Plaintiffs' internal campaign governance, donor or vendor relationships, volunteer identities, signature-gathering totals, and individual signed petition pages is not relevant to those narrow questions and raises serious confidentiality and privacy concerns.

To the extent any Request seeks personally identifying information of signers, volunteers, or low-level staff, Plaintiffs object on grounds of privacy, undue burden, and potential chilling of core political speech and association, and will not produce such information. Plaintiffs further object to producing documents reflecting nonpublic campaign strategy, vendor contracts, or internal analyses.

Objections to Definitions and Instructions

Plaintiffs object to Intervenor's Definitions and Instructions to the extent they impose obligations on Plaintiffs inconsistent with or in addition to the obligations imposed by the Missouri Supreme Court Rules. Plaintiffs will respond to these interrogatories in accordance with Rule 57.01.

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: Plaintiffs object to this interrogatory to the extent it seeks attorney work product or information beyond the identity of individuals supplying factual information. Subject to and without waiving these objections, Plaintiffs respond that these interrogatories were answered by Richard von Glahn, with the assistance of counsel. Plaintiffs incorporate by reference their answer to Interrogatory Number 5.

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: None.

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: None.

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

ANSWER: Plaintiffs object to this Interrogatory in that it seeks information that is protected by the work product doctrine.

Subject to and without waiving the foregoing objection, Plaintiffs state that all parties (including Intervenor) have agreed to stipulations which should make live witnesses unnecessary. To the extent they are, Plaintiffs reserve the right to call Richard von Glahn, Chrissy Peters, Denny Hoskins, and Rachael Dunn.

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

ANSWER: Mr. von Glahn is the proponent of the referendum petitions and People Not Politicians is the campaign committee supporting those petitions, as stated in the Petition. Plaintiffs incorporate by reference their answer to Interrogatory Number 7.

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

ANSWER: Plaintiffs object that this Interrogatory seeks information which is irrelevant to any claim or defense in this litigation. Plaintiffs further object that this Interrogatory is overbroad, invasive of privacy, and not proportional to the needs of this case. To the extent personal information about board members is sought (particularly home address), Plaintiffs object.

Subject to and without waiving the foregoing objections, the board members of People not Politicians are David Cook, Tom Newport, and Michael Pridmore. Each individual has served on the board of directors since the formation of the entity, on or about August 12, 2025. They may be contacted through Plaintiffs' counsel.

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

ANSWER: Plaintiffs incorporate by reference their objections to Interrogatory Number 6 as if fully set forth herein.

Subject to and without waiving the foregoing objections, Richard von Glahn is the Executive Director, David Cook is the President, Tom Newport is the Secretary, and Michael Pridmore is the Treasurer of People Not Politicians. Mr. von Glahn has responsibility for day to day operations and the other officers have the duties traditional associated with those offices—the President oversees the board, the Secretary keeps the records, and the Treasurer manages the finances.

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

ANSWER: Plaintiffs object that this Interrogatory seeks information which is not relevant to any claim or defense in this litigation. Plaintiffs further object to this Interrogatory to the extent it seeks internal governance information and information protected by the attorney-client privilege and work product doctrine.

Subject to and without waiving the foregoing objections, decisions concerning litigation are delegated to the Executive Director.

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

ANSWER: Plaintiffs object that this Interrogatory seeks information which is not relevant to any claim or defense in this litigation.

Subject to and without waiving the foregoing objection, the Board has delegated decisions about litigation to the Executive Director. They did so on August 22, 2025.

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

ANSWER: Plaintiffs object that this interrogatory is vague and overbroad. Plaintiffs are not sure what is meant by "all facts supporting." Additionally, Plaintiffs object that this Interrogatory seeks information protected by the attorney-client privilege and work product doctrine. Subject and waiting waiving the foregoing objection, Paragraph 57 is supported by, the personal knowledge of Richard von Glahn who submitted the sheets. Plaintiffs also refer the

intervenor to Joint Stipulation of Facts and Exhibits (filed October 28) between Plaintiffs and Defendants, Paragraphs 29 and 32.

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

ANSWER: Plaintiffs object that this interrogatory is vague and overbroad. Plaintiffs are not sure what is meant by “all facts supporting.” Additionally, Plaintiffs object that this Interrogatory seeks information protected by the attorney-client privilege and work product doctrine.

Subject to and without waiving the foregoing objections, Plaintiffs state that Paragraph 29 of the Joint Stipulation of Facts and Exhibits is the result of a request from Principal Deputy Attorney General William Seidleck to counsel for Plaintiffs asking “whether we can stipulate to the number of signatures gathered as of (1) September 29 (the day Mr. von Glahn submitted the final sample sheet) and (2) October 14 (when the sample sheet was approved as to form).” Mr. Seidleck made that request on October 27. Thereafter, Plaintiffs’ counsel worked with their clients to provide good faith figures to satisfy the Secretary’s request based on information known to Richard von Glahn.

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

ANSWER: Plaintiffs incorporate by reference their answer and objections to Interrogatory Number 11 as if fully set forth herein.

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

ANSWER: Interrogatory Number 13 is identical to Interrogatory Number 9. Plaintiffs incorporate by reference their answer to Interrogatory Number 9 as if fully set forth herein.

14. Are you Circulating 2026-R001?

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

ANSWER: Plaintiffs object to this Interrogatory because it seeks information that is irrelevant to the claims or defenses in this litigation. Plaintiffs further object that this Interrogatory is overbroad, seeks sensitive campaign information, and is not proportional to the needs of this case.

Subject to and without waving the foregoing objections, Plaintiffs are circulating the sample sheet included in Exhibit A to their Amended Petition. Because the Secretary agrees that all 4 sample sheets submitted are identical, this Interrogatory is ambiguous as to what is meant by 2026-R001.

15. Are you Circulating 2026-R002?

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

ANSWER: Plaintiffs incorporate by reference their objections and answer to Interrogatory Number 14 as if fully set forth herein.

16. Are you Circulating 2026-R003?

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

ANSWER: Plaintiffs incorporate by reference their objections and answer to Interrogatory Number 14 as if fully set forth herein.

17. Are you Circulating 2026-R004?

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

ANSWER: Plaintiffs incorporate by reference their objections and answer to Interrogatory Number 14 as if fully set forth herein.

Respectfully Submitted,

STINSON LLP

/s/ Alixandra S. Cossette

Charles W. Hatfield, No. 40363

Alixandra Cossette, No. 68114

Alexander C. Barrett, No. 68695

Greta M. Bax, No. 73354

230 W. McCarty Street

Jefferson City, Missouri 65101

Phone: (573) 636-6263

Facsimile: (573) 636-6231

chuck.hatfield@stinson.com

alix.cossette@stinson.com

alexander.barrett@stinson.com

greta.bax@stinson.com

VERIFICATION

STATE OF MISSOURI)

COUNTY OF ST LOUIS)

) ss.

I Richard von Glahn, of lawful age, being first duly sworn on my oath, states that I am an officer, agent or employee of People Not Politicians, that I am duly authorized to sign these interrogatory answers on behalf of People Not Politicians + myself, that I have read the above and foregoing interrogatory answers and that the answers are true and correct according to my best knowledge, information and belief.

By: 

Subscribed and sworn to before me, a notary public, this 21st day of November, 2025.


Notary Public

My commission expires: 06/10/2029

