

**RELATORS
PEOPLE NOT
POLITICIANS, Et Al.
PETITION FOR
PROHIBITION
EXHIBIT 27**

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS, *et al.*,

Plaintiffs,

v.

MISSOURI SECRETARY OF STATE,

Defendant.

Case No. 25AC-CCo7128

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

Plaintiffs provide this supplemental response to interrogatories without waiving any objections they have previously made or waiving their right to review by the Court of Appeals. The remainder of this document restates the original responses and then, under each interrogatory, provides a "**SUPPLEMENTAL RESPONSE**" as a response to the Court's order granting Intervenor's Motion to Compel or, in the Alternative, for Sanctions.

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 without 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.

SUPPLEMENTAL RESPONSE: In response to the Court's order compelling a response, and without waiving any objections it has previously made, Plaintiffs provide the following: To the extent the request is for the number of signatures on *unfiled* referendum petition pages, at the time of the filing of the Amended Petition and/or stipulations, Plaintiffs state that in response to a request from the Missouri Attorney General to identify signatures gathered, Mr. von Glahn relied on the following facts: Mr. von Glahn was aware that thousands of Missourians were engaged in circulating initiative petition pages in an attempt to gather signatures. He had previously received oral reports about the progress of those efforts. He had talked to signature gatherers and affiliated groups and formed a general understanding of the numbers of signatures that the various individuals and groups had gathered. He also consulted an online summary concerning the number of signatures gathered. Mr. von Glahn adjusted that number slightly upward based on the historical rate of signature collection, which he knew from the same sources. There are no other facts on which the signature numbers in the Petition and Joint Stipulation were based.

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.

SUPPLEMENTAL RESPONSE: Same as to 10.

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.

SUPPLEMENTAL RESPONSE: Same as to 10.

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.

SUPPLEMENTAL RESPONSE: Plaintiffs interpret this request to ask if they are circulating the piece of paper to which the Secretary apparently assigned the identifier 2026-R0001. If that is the correct interpretation, the answer is no.

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.

SUPPLEMENTAL RESPONSE: Plaintiffs interpret this request to ask if they are circulating the piece of paper to which the Secretary apparently assigned the identifier 2026-R0002. If that is the correct interpretation, the answer is no.

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.

SUPPLEMENTAL RESPONSE: Plaintiffs are circulating the document produced as Exhibit A. Plaintiffs do not refer to it by number or accept any particular number assigned by the Secretary of State. The correspondence the Secretary sent to Plaintiffs does not use a particular number, but refers to the date on which a petition sample sheet was signed. Plaintiffs are aware that the Secretary has assigned internal numbers to petition sheets submitted at different times. Plaintiffs agree with the Secretary's representations to the Court that the document he assigned identifier 2026-R003 is identical to the document he assigned identifier 2026-R004. Plaintiffs answer that they are circulating Exhibit A, which the Secretary sometimes refers to as both 2026-R003 and 2026-R004. As to the number of signatures, Plaintiffs will produce their "filed referendum petitions" at the office of the Secretary of State later this week, at which time the Intervenors may ascertain the answers by reference to produced records.

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.

SUPPLEMENTAL RESPONSE: Same as to 16.

Respectfully Submitted,

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