

28. Please describe the process by which you identified the records you have produced in response to MAF's May 8, 2017 request. Include in your description the process by which you identified all hard copy documents, all text and instant messages, all calendar entries, and all emails. Include in your description all search protocols you used to identify electronic records for production.

RESPONSE:

29. Please describe the process by which you identified the records you have excluded from production in response to MAF's May 8, 2017 request. Include in your description the process by which you identified for exclusion all hard copy documents, all text and instant messages, all calendar entries, and all emails. Include in your description all search protocols you used to identify electronic records for exclusion.

RESPONSE:

30. Please identify all persons who participated in any way at any time in identifying the documents you produced or excluded from production in response to MAF's May 8, 2017 request.

RESPONSE:

31. Please identify and describe all responsive records you have excluded from your response to MAF's May 8, 2017 request under sections 29.070, 29.200.17, 29.221, 32.057, 610.021(1), 610.021(13), 610.021(14), 610.021(17), and 610.021(21), RSMo., and 17 U.S.C. § 102. Please identify which section or sections above you believe justify exclusion of each document identified.

RESPONSE:

32. Please identify and describe all records responsive to MAF's May 8, 2017 request that meet the following criteria: (a) you have excluded them from your response to MAF's May 8, 2017 request; and (b) you have not identified and described them in your response to Interrogatory 31.

RESPONSE:

33. Please state how many responsive records you have withheld from your response to MAF's May 8, 2017. Include in your response all records described in Paragraph 40 of your Answer as "document [sic] protected from disclosure by law." Include all records you have identified in your responses to Interrogatories 31 and 32.

RESPONSE:

34. Please state how many records you produced on or before July 21, 2017 in response to MAF's May 8, 2017 request.

RESPONSE:

35. Please state how many records you produced after July 21, 2017 in response to MAF's May 8, 2017 request.

RESPONSE:

36. Do you contend that every responsive record you have withheld from your response to MAF's May 2, 2017 request is a protected from disclosure by one or more statutes cited in Interrogatory 23?

RESPONSE:

37. Do you contend that every responsive record you have withheld from your response to MAF's May 8, 2017 request is a protected from disclosure by one or more statutes cited in Interrogatory 31?

RESPONSE:

38. Please describe the process by which you identified the records you have produced in response to MAF's May 26, 2017 request. Include in your description the

process by which you identified all hard copy documents, all text and instant messages, all calendar entries, and all emails. Include in your description all search protocols you used to identify electronic records for production.

RESPONSE:

39. Please describe the process by which you identified the records you have excluded from production in response to MAF's May 26, 2017 request. Include in your description the process by which you identified for exclusion all hard copy documents, all text and instant messages, all calendar entries, and all emails. Include in your description all search protocols you used to identify electronic records for exclusion.

RESPONSE:

40. Please identify all persons who participated in any way at any time in identifying the documents you produced or excluded from production in response to MAF's May 26, 2017 request.

RESPONSE:

41. Please identify and describe all documents you have excluded from your response to MAF's May 26, 2017 request under sections 29.070, 29.200.17, 29.221, 32.057, 610.021(1), 610.021(13), 610.021(14), 610.021(17), and 610.021(21), RSMo., and 17 U.S.C.

§ 102. Please identify which section or sections above you believe justify exclusion of each document identified.

RESPONSE:

42. Please identify and describe all records responsive to MAF's May 26, 2017 request that meet the following criteria: (a) you have excluded them from your response to MAF's May 26, 2017 request; and (b) you have not identified and described them in your response to Interrogatory 41.

RESPONSE:

43. Please state how many responsive records you have withheld from your response to MAF's May 26, 2017 request.

RESPONSE:

44. Please state how many responsive records you produced on or before July 21, 2017 in response to MAF's May 26, 2017 request.

RESPONSE:

45. Please state how many responsive records you produced after July 21, 2017 in response to MAF's May 26, 2017 request.

RESPONSE:

46. Do you contend that every responsive record you have withheld from your response to MAF's May 26, 2017 request is a protected from disclosure by one or more statutes cited in Interrogatory 41?

RESPONSE:

47. Please state how many records you have "review[ed]" as stated in Paragraph 50 of your Answer.

RESPONSE:

48. Please identify and describe every record that you have determined to be closed since July 21, 2017.

RESPONSE:

49. Please identify and describe all documents you have relied on to respond to any Interrogatory or Request for Production in this matter.

RESPONSE:

Respectfully submitted this 23rd day of August, 2017.

GRAVES GARRETT, LLC



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Freedom, Inc.*

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI
19th JUDICIAL CIRCUIT**

MISSOURI ALLIANCE)	
FOR FREEDOM, Inc.)	Case No. 17AC-CC00365
)	
Plaintiff,)	
)	
v.)	
)	
MISSOURI AUDITOR)	
NICOLE GALLOWAY)	
)	
Defendant.)	

**PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT NICOLE GALLOWAY**

Plaintiff Missouri Alliance for Freedom, Inc. ("MAF") propounds the following requests for production of documents to Defendant Nicole Galloway. Responses should be provided within the time period prescribed by the Missouri Rules of Civil Procedure.

Definitions and Instructions

1. The terms "you" and "your" shall mean Defendant Nicole Galloway and each and every person acting or alleged to have acted on her behalf.

2. The present tense includes the past and future tenses. The singular includes the plural, and the plural includes the singular. "All" means "any and all"; "any" means "any and all." "Including" means "including but not limited to." "And"

and "or" encompass both "and" and "or." Words in the masculine, feminine or neuter form shall include each of the other genders.

3. The term "documents" is used in the broad sense and includes, without limitation, the following items whether printed or recorded, reproduced by any mechanical, electronic or photographic process, or written or produced by hand, and shall include all drafts and copies of any such document (unless such copy is identical in every respect with the original or copy thereof produced), namely: agreements; communications, including newspaper or other periodical reports or articles; intracorporate communications; correspondence; telegrams; memoranda; records; books; summaries or records of telephone conversations; telephone logs; diaries; forecasts; financial statements; statistical statements; management letters; accountants' or clients' work papers; manuals; graphs; charts; accounts; analytical records; minutes or records of meetings or conferences; reports and/or summaries of interviews; reports and/or summaries of investigations; opinions or reports of consultants; appraisals; reports or summaries of negotiations' brochures; pamphlets; circulars; trade letters; press releases; mag cards; telex files; teletype; contracts; notes; projections; marginal notations; photographs; drawings; specifications; securities ledgers or other records of original entry; checks, back and front; typed or stenographic transcripts or any testimony given at any legal or investigative proceeding; text messages, social media posts, messages, or

communications, drafts of any of the foregoing, if applicable; or other documents or writings of whatever description.

4. If any document responsive to these requests is withheld under a claim of privilege, furnish a list specifying each such document and setting forth the following information: (a) the date of the document; (b) a description of the subject matter of the document; (c) the name, address and identification by employment and title of each person who prepared, received, viewed and has or has had possession, custody or control of the document; (d) a statement of the basis upon which the privilege is claimed; and (e) the paragraph or paragraphs of these requests to which the document relates.

5. Where a requested document is destroyed, or alleged to have been destroyed, furnish a list specifying each such document and setting forth the following information: (a) the date of the document; (b) a description of the subject matter of the document; (c) the name, address and identification by employment and title of each person who prepared, received, viewed and has had possession, custody or control of the document; (d) the date of its destruction; (e) the reason for its destruction; (f) the identity of each person having knowledge of its destruction; and (g) the paragraph or paragraphs of these requests to which the document relates.

6. If a requested document exists in electronic format, produce that document in its native electronic format, preserving all metadata.

7. These requests for production are intended to be continuing in nature and must be supplemented as required by the Missouri Rules of Civil Procedure.

Requests for Production

13. Please produce all documents relating in any way to the process described in your response to Interrogatory 20.

RESPONSE:

14. Please produce all documents relating in any way to the process described in your response to Interrogatory 21.

RESPONSE:

15. Please produce all documents described in your response to Interrogatory 23.

RESPONSE:

Respectfully submitted this 16th day of August, 2017.

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Freedom, Inc.*

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI
19th JUDICIAL CIRCUIT**

MISSOURI ALLIANCE)	
FOR FREEDOM, Inc.)	Case No. 17AC-CC00365
)	
Plaintiff,)	
)	
v.)	
)	
MISSOURI AUDITOR)	
NICOLE GALLOWAY)	
)	
Defendant.)	

**PLAINTIFF'S SECOND INTERROGATORIES
TO DEFENDANT NICOLE GALLOWAY**

Plaintiff Missouri Alliance for Freedom, Inc. ("MAF") propounds the following interrogatories to Defendant Nicole Galloway. Responses should be provided within the time period prescribed by the Missouri Rules of Civil Procedure.

Definitions and Instructions

1. The terms "you" and "your" shall mean Defendant Nicole Galloway and each and every person acting or alleged to have acted on her behalf.

2. The present tense includes the past and future tenses. The singular includes the plural, and the plural includes the singular. "All" means "any and all"; "any" means "any and all." "Including" means "including but not limited to." "And" and "or" encompass both "and" and "or." Words in the masculine, feminine, or neuter form shall include each of the other genders.

3. The term "documents" is used in the broad sense and includes, without limitation, the following items whether printed or recorded, reproduced by any mechanical, electronic or photographic process, or written or produced by hand, and shall include all drafts and copies of any such document (unless such copy is identical in every respect with the original or copy thereof produced), namely: agreements; communications, including newspaper or other periodical reports or articles; intracorporate communications; correspondence; telegrams; memoranda; records; books; summaries or records of telephone conversations; telephone logs; diaries; forecasts; financial statements; statistical statements; management letters; accountants' or clients' work papers; manuals; graphs; charts; accounts; analytical records; minutes or records of meetings or conferences; reports and/or summaries of interviews; reports and/or summaries of investigations; opinions or reports of consultants; appraisals; reports or summaries of negotiations' brochures; pamphlets; circulars; trade letters; press releases; mag cards; telex files; teletype; contracts; notes; projections; marginal notations; photographs; drawings; specifications; securities ledgers or other records of original entry; checks, back and front; typed or stenographic transcripts or any testimony given at any legal or investigative proceeding; text messages, social media posts, messages, or communications, drafts of any of the foregoing, if applicable; or other documents or writings of whatever description.

4. The terms "identify," "identity" or "identification," when used in reference to a natural person, require you to state the person's full name, last known address, home and

business telephone number, and present business affiliation. When used in reference to a person other than a natural person, the terms "identify," "identity" or "identification," require you to describe the nature of such person (that is, whether it is a corporation, partnership, etc. under the definition of "person" (see below)), and to state that person's last known address and telephone number, and principal place of business. Once any person has been identified properly, it shall be sufficient thereafter when identifying that same person to state the name only.

5. The terms "identify," "identity," or "identification" as they relate to documents require you to state the date, the author (and, if different, the signor or signors), the addressee, and the type of document (e.g., letter, memorandum, telegram, chart, etc.). If any document was but is no longer in your possession or subject to your control, state what disposition was made of it, the reason for the disposition, and who currently has the document or whether it was destroyed. If the document is produced under this request, label the document so it appropriately corresponds to the interrogatory in response to which it is being produced. When used in relation to communications, the term "identify" incorporates the requirements for documents and also requires that you identify the participants in, time of, and substance of any oral or non-written communications.

6. The terms "person" and "persons" refer to all individuals, partnerships, associations, firms, companies, joint ventures, corporations, trusts, estates, governmental agencies, and any other entity.

7. The term “describe” requires you to explain in full and in detail all elements of the object of the description. Where the term “describe” applies to a process, procedure, or proceeding, you must reveal the process, procedure, or proceeding in full and in detail, including: all steps or elements of the process, procedure, or proceeding; the identity of any person or group of persons with decision making authority; the identity of any person or persons with fact-finding or advisory duties as part of the process, procedure, or proceeding; the source of any person or persons’ authority or duties as part of the process, procedure, or proceeding; the facts considered by the person or persons with decision making authority, fact-finding duties, or advisory duties as part of the process, procedure, or proceeding; the applicable rules, regulations, or other similar controlling authority relating to the process, procedure, or proceeding; and the identity of any documents relating in any way to the process, procedure, or proceeding.

8. If any answer is refused, in whole or in part, on the basis of a claim of privilege, state the ground of the privilege claimed, the general nature of the matter withheld (e.g., substance of a conversation, contents of a memoranda, etc.), the date of the origination of the withheld information, the name of the originator, the names of all persons to whom the withheld information was distributed, shown or explained.

9. If you cannot answer an interrogatory in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying

your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

10. "Public business" means all matters which relate in any way to the performance of your duties as Auditor or your service as Auditor or to the performance of any employee or agent of the Office of the Auditor.

11. "Correspond" means to receive or to transmit communications of any kind.

12. These interrogatories are intended to be continuing in nature and must be supplemented as required by the Missouri Rules of Civil Procedure.

Interrogatories

20. Please describe the process by which you identified the records you have produced in response to MAF's May 2, 2017 request. Include in your description the process by which you identified all hard copy documents, all text and instant messages, all calendar entries, and all emails. Include in your description all search protocols you used to identify electronic records for production.

RESPONSE:

21. Please describe the process by which you identified the records you have excluded from production in response to MAF's May 2, 2017 request. Include in your description the process by which you identified for exclusion all hard copy documents, all text and instant messages, all calendar entries, and all emails. Include in your description all search protocols you used to identify electronic records for exclusion.

RESPONSE:

22. Please identify all persons who participated in any way at any time in identifying the documents you produced or excluded from production in response to MAF's May 2, 2017 request.

RESPONSE:

23. Please identify and describe all documents you have excluded from your response to MAF's May 2, 2017 request under sections 29.070, 29.200.17, 29.221, 32.057, 610.021(1), 610.021(13), 610.021(14), 610.021(17), and 610.021(21), RSMo., and 17 U.S.C. § 102. Please identify which section or sections above you believe justify exclusion of each document identified.

RESPONSE:

Respectfully submitted this 16th day of August, 2017.

GRAVES GARRETT, LLC



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*Attorneys for Missouri Alliance for
Freedom, Inc.*

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI
19th JUDICIAL CIRCUIT**

MISSOURI ALLIANCE)	
FOR FREEDOM, Inc.)	Case No. 17AC-CC00365
)	
Plaintiff,)	
)	
v.)	
)	
MISSOURI AUDITOR)	
NICOLE GALLOWAY)	
)	
Defendant.)	

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT NICOLE GALLOWAY**

Plaintiff Missouri Alliance for Freedom, Inc. ("MAF") propounds the following requests for production of documents to Defendant Nicole Galloway. Responses should be provided within the time period prescribed by the Missouri Rules of Civil Procedure.

Definitions and Instructions

1. The terms "you" and "your" shall mean Defendant Nicole Galloway and each and every person acting or alleged to have acted on her behalf.

2. The present tense includes the past and future tenses. The singular includes the plural, and the plural includes the singular. "All" means "any and all"; "any" means "any and all." "Including" means "including but not limited to." "And"

and "or" encompass both "and" and "or." Words in the masculine, feminine or neuter form shall include each of the other genders.

3. The term "documents" is used in the broad sense and includes, without limitation, the following items whether printed or recorded, reproduced by any mechanical, electronic or photographic process, or written or produced by hand, and shall include all drafts and copies of any such document (unless such copy is identical in every respect with the original or copy thereof produced), namely: agreements; communications, including newspaper or other periodical reports or articles; intracorporate communications; correspondence; telegrams; memoranda; records; books; summaries or records of telephone conversations; telephone logs; diaries; forecasts; financial statements; statistical statements; management letters; accountants' or clients' work papers; manuals; graphs; charts; accounts; analytical records; minutes or records of meetings or conferences; reports and/or summaries of interviews; reports and/or summaries of investigations; opinions or reports of consultants; appraisals; reports or summaries of negotiations' brochures; pamphlets; circulars; trade letters; press releases; mag cards; telex files; teletype; contracts; notes; projections; marginal notations; photographs; drawings; specifications; securities ledgers or other records of original entry; checks, back and front; typed or stenographic transcripts or any testimony given at any legal or investigative proceeding; text messages, social media posts, messages, or

communications, drafts of any of the foregoing, if applicable; or other documents or writings of whatever description.

4. If any document responsive to these requests is withheld under a claim of privilege, furnish a list specifying each such document and setting forth the following information: (a) the date of the document; (b) a description of the subject matter of the document; (c) the name, address and identification by employment and title of each person who prepared, received, viewed and has or has had possession, custody or control of the document; (d) a statement of the basis upon which the privilege is claimed; and (e) the paragraph or paragraphs of these requests to which the document relates.

5. Where a requested document is destroyed, or alleged to have been destroyed, furnish a list specifying each such document and setting forth the following information: (a) the date of the document; (b) a description of the subject matter of the document; (c) the name, address and identification by employment and title of each person who prepared, received, viewed and has had possession, custody or control of the document; (d) the date of its destruction; (e) the reason for its destruction; (f) the identity of each person having knowledge of its destruction; and (g) the paragraph or paragraphs of these requests to which the document relates.

6. If a requested document exists in electronic format, produce that document in its native electronic format, preserving all metadata.

7. These requests for production are intended to be continuing in nature and must be supplemented as required by the Missouri Rules of Civil Procedure.

Requests for Production

1. Please produce all documents relating in any way to the correspondence identified and described in your response to Interrogatory 4.

RESPONSE:

2. Please produce all documents relating in any way to the correspondence identified and described in your response to Interrogatory 5.

RESPONSE:

3. Please produce all documents relating in any way to the correspondence identified and described in your response to Interrogatory 6.

RESPONSE:

4. Please produce all documents relating in any way to the processing you describe in your response to Interrogatory 7.

RESPONSE:

5. Please produce all documents relating in any way to the instances you describe in your response to Interrogatory 8.

RESPONSE:

6. Please produce all documents relating in any way to the requests identified in your response to Interrogatory 9.

RESPONSE:

7. Please produce all documents relating in any way to the actions identified and described in your response to Interrogatory 10.

RESPONSE:

8. Please produce all documents relating in any way to the policies, practices, procedures, and other methods you identified and described in your Response to Interrogatory 11.

RESPONSE:

9. Please produce all documents relating in any way to the correspondence identified and described in your response to Interrogatory 15.

RESPONSE:

10. Please produce all documents you identified and described in your response to Interrogatory 16.

RESPONSE:

11. Please produce all records identified and described in your response to Interrogatory 18.

RESPONSE:

12. Please produce all documents relating in any way to the instances you identified and described in your response to Interrogatory 19.

RESPONSE:

Respectfully submitted this 19th day of July, 2017.

GRAVES GARRETT, LLC



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*Attorneys for Missouri Alliance for
Freedom, Inc.*

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI
19th JUDICIAL CIRCUIT**

MISSOURI ALLIANCE)	
FOR FREEDOM, Inc.)	Case No. 17AC-CC00365
)	
Plaintiff,)	
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v.)	
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MISSOURI AUDITOR)	
NICOLE GALLOWAY)	
)	
Defendant.)	

**PLAINTIFF'S FIRST INTERROGATORIES
TO DEFENDANT NICOLE GALLOWAY**

Plaintiff Missouri Alliance for Freedom, Inc. ("MAF") propounds the following interrogatories to Defendant Nicole Galloway. Responses should be provided within the time period prescribed by the Missouri Rules of Civil Procedure.

Definitions and Instructions

1. The terms "you" and "your" shall mean Defendant Nicole Galloway and each and every person acting or alleged to have acted on her behalf.

2. The present tense includes the past and future tenses. The singular includes the plural, and the plural includes the singular. "All" means "any and all"; "any" means "any and all." "Including" means "including but not limited to." "And" and "or" encompass both "and" and "or." Words in the masculine, feminine, or neuter form shall include each of the other genders.

3. The term "documents" is used in the broad sense and includes, without limitation, the following items whether printed or recorded, reproduced by any mechanical, electronic or photographic process, or written or produced by hand, and shall include all drafts and copies of any such document (unless such copy is identical in every respect with the original or copy thereof produced), namely: agreements; communications, including newspaper or other periodical reports or articles; intracorporate communications; correspondence; telegrams; memoranda; records; books; summaries or records of telephone conversations; telephone logs; diaries; forecasts; financial statements; statistical statements; management letters; accountants' or clients' work papers; manuals; graphs; charts; accounts; analytical records; minutes or records of meetings or conferences; reports and/or summaries of interviews; reports and/or summaries of investigations; opinions or reports of consultants; appraisals; reports or summaries of negotiations' brochures; pamphlets; circulars; trade letters; press releases; mag cards; telex files; teletype; contracts; notes; projections; marginal notations; photographs; drawings; specifications; securities ledgers or other records of original entry; checks, back and front; typed or stenographic transcripts or any testimony given at any legal or investigative proceeding; text messages, social media posts, messages, or communications, drafts of any of the foregoing, if applicable; or other documents or writings of whatever description.

4. The terms "identify," "identity" or "identification," when used in reference to a natural person, require you to state the person's full name, last known address, home and business telephone number, and present business affiliation. When used in reference to a person other than a natural person, the terms "identify," "identity" or "identification," require you to describe the nature of such person (that is, whether it is a corporation, partnership, etc. under the definition of "person" (see below)), and to state that person's last known address and telephone number, and principal place of business. Once any person has been identified properly, it shall be sufficient thereafter when identifying that same person to state the name only.

5. The terms "identify," "identity," or "identification" as they relate to documents require you to state the date, the author (and, if different, the signor or signors), the addressee, and the type of document (e.g., letter, memorandum, telegram, chart, etc.). If any document was but is no longer in your possession or subject to your control, state what disposition was made of it, the reason for the disposition, and who currently has the document or whether it was destroyed. If the document is produced under this request, label the document so it appropriately corresponds to the interrogatory in response to which it is being produced. When used in relation to communications, the term "identify" incorporates the requirements for documents and also requires that you identify the participants in, time of, and substance of any oral or non-written communications.

6. The terms "person" and "persons" refer to all individuals, partnerships, associations, firms, companies, joint ventures, corporations, trusts, estates, governmental agencies, and any other entity.

7. The term "describe" requires you to explain in full and in detail all elements of the object of the description. Where the term "describe" applies to a process, procedure, or proceeding, you must reveal the process, procedure, or proceeding in full and in detail, including: all steps or elements of the process, procedure, or proceeding; the identity of any person or group of persons with decision making authority; the identity of any person or persons with fact-finding or advisory duties as part of the process, procedure, or proceeding; the source of any person or persons' authority or duties as part of the process, procedure, or proceeding; the facts considered by the person or persons with decision making authority, fact-finding duties, or advisory duties as part of the process, procedure, or proceeding; the applicable rules, regulations, or other similar controlling authority relating to the process, procedure, or proceeding; and the identity of any documents relating in any way to the process, procedure, or proceeding.

8. If any answer is refused, in whole or in part, on the basis of a claim of privilege, state the ground of the privilege claimed, the general nature of the matter withheld (e.g., substance of a conversation, contents of a memoranda, etc.), the date of the

origination of the withheld information, the name of the originator, the names of all persons to whom the withheld information was distributed, shown or explained.

9. If you cannot answer an interrogatory in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

10. "Public business" means all matters which relate in any way to the performance of your duties as Auditor or your service as Auditor or to the performance of any employee or agent of the Office of the Auditor.

11. "Correspond" means to receive or to transmit communications of any kind.

12. These interrogatories are intended to be continuing in nature and must be supplemented as required by the Missouri Rules of Civil Procedure.

Interrogatories

1. Please identify and describe each address and each account that you have used to correspond with any person concerning public business while serving as Auditor. This request includes not only electronic mail, but also non-traditional messaging services such as iMessage, Twitter, Facebook, Snapchat, Instagram, and other similar services. If you no longer have access to such an account, identify the date on which you last had access.

RESPONSE:

2. Please identify and describe each address and each account that Paul Harper has used to correspond with any person concerning public business while you have been serving as Auditor. This request includes not only electronic mail, but also non-traditional messaging services such as iMessage, Twitter, Facebook, Snapchat, Instagram, and other similar services. If he no longer has access to such an account, identify the date on which he last had access.

RESPONSE:

3. Please identify and describe each address and each account that Douglas Nelson has used to correspond with any person concerning public business while you have been serving as Auditor. This request includes not only electronic mail, but also non-traditional messaging services such as iMessage, Twitter, Facebook, Snapchat, Instagram, and other similar services. If he no longer has access to such an account, identify the date on which he last had access.

RESPONSE:

4. Please identify and describe each instance when you have corresponded with any party concerning public business while serving as Auditor using any account

identified in your response to Interrogatory 1. Identify the party and the date and the subject matter of the correspondence.

RESPONSE:

5. Please identify and describe each instance when Paul Harper has corresponded with any party concerning public business while you have been serving as Auditor using any account identified in your response to Interrogatory 2. Identify the party and the date and the subject matter of the correspondence.

RESPONSE:

6. Please identify and describe each instance when Douglas Nelson has corresponded with any party concerning public business while you have been serving as Auditor using any account identified in your response to Interrogatory 3. Identify the party and the date and the subject matter of the correspondence.

RESPONSE:

7. Please identify and describe the processing of each request for public records that you have received while serving as Auditor. Describe all records relating to the processing of the request, including the request, the date your received the request, your response to the request, and any correspondence (within your Office or between

your Office and other parties) concerning the processing of the request. Please do not include the actual documents you produced, other than your letter describing your response.

RESPONSE:

8. Please identify and describe each instance when you have provided any correspondence concerning public business from any account to any person other than the correspondent or correspondents of such document, whether or not in response to any request.

RESPONSE:

9. Please identify and describe each instance when any person has requested production of any correspondence concerning public business transmitted or received by you. For purposes of your response, you do not need to disclose instances already disclosed in your responses to Interrogatories 7 and 8.

RESPONSE:

10. Please identify and describe the actions you have taken in response to every request identified in your response to Interrogatory 9. Specifically identify and describe whether and to what extent you have produced correspondence in response to

such requests. For purposes of your response, you do not need to disclose information already disclosed in your responses to Interrogatories 7 and 8.

RESPONSE:

11. Please identify and describe all policies, practices, procedures, and other methods you and your staff use to respond to requests under Chapter 610, RSMo.

RESPONSE:

12. Please identify all agents, staff, or employees of yours who carry out, perform, or otherwise act in response to requests under Chapter 610, RSMo.

RESPONSE:

13. Please identify all agents, staff, or employees of yours who carry out, perform, or otherwise act with respect to any policy, practice, procedure, or other method identified in your response to Interrogatory 11.

RESPONSE:

14. Please identify all agents, staff, or employees of yours who participated in any way in your response to MAF's May 2, May 8, and May 26, 2017 requests under Chapter 610, RSMo.

RESPONSE:

15. Please identify and describe all correspondence involving any person, individual, or group relating in any way to MAF's May 2, May 8, and May 26 requests under Chapter 610, RSMo.

RESPONSE:

16. Please identify and describe all documents relating in any way to your consideration or processing of MAF's May 2, May 8, and May 26 requests under Chapter 610.

RESPONSE:

17. Please identify each person who has provided information technology support to you concerning any account or device you have used to correspond concerning public business.

RESPONSE:

18. Please identify and describe all records relating in any way to your decision to audit the Department of Revenue concerning its processing of tax refunds. In your response, you should identify the date and the subject matter of the record.

Include all correspondence (within your Office or between you or your agents and employees and other parties) relating in any way to your decision to audit the Department of Revenue.

RESPONSE:

19. Please identify and describe each instance when you or any of your agents or employees (including Paul Harper and Douglas Nelson) have corresponded with any party (whether within or outside of your Office) concerning either (i) your audit of the Department of Revenue concerning its processing of tax refunds, or (ii) your audits of the Treasurer for the periods ending June 30, 2016 and January 9, 2017.

RESPONSE:

Respectfully submitted this 19th day of July, 2017.

GRAVES GARRETT, LLC



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