

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30736
LANSING, MICHIGAN 48909

DANA NESSEL
ATTORNEY GENERAL

January 27, 2025

Clerk of the Court
30th Judicial Circuit Court
313 W. Kalamazoo Street, 1st Floor
Lansing, MI 48933

Re: *Dana Nessel, Attorney General of the State of Michigan v Donald Peltier. Case No. 24-830-CZ; Hon. Wanda M. Stokes*

Dear Clerk:

Enclosed for filing, please find the Proof of Service for the Attorney General's Second Set of Discovery Requests Part 1, Part 2 and Requests for Production of Documents to Defendant Donald Peltier in relation to the above-referenced matter.

If you should have any questions or concerns, please contact our office at the number below. Thank you.

Sincerely,

By: /s/ Brien Winfield Heckman
Brien Winfield Heckman (P76006)
Assistant Attorney General
Attorney for Plaintiff

BWH/mks
Enclosures

cc: Donald Peltier

STATE OF MICHIGAN
CIRCUIT COURT FOR THE 30TH JUDICIAL CIRCUIT
INGHAM COUNTY

DANA NESSEL, ATTORNEY GENERAL OF
THE STATE OF MICHIGAN,

Plaintiff,

No. 2024-830-CZ

v

HON. WANDA M. STOKES

DONALD PELTIER,

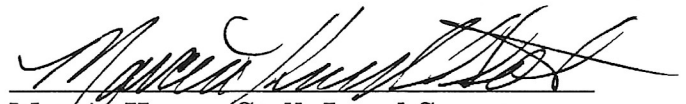
Defendant.

Brien Winfield Heckman (P76006)
Attorney for Plaintiff
Michigan Department of Attorney General
Corporate Oversight Division
P.O. Box 30736
Lansing, MI 48909
(517) 335-7632

PROOF OF SERVICE

To: Donald Peltier
356 Granby Road
South Hadley MA 01075-2210

The undersigned certifies that a copy of the Attorney General's Second Set of Discovery Requests Part 1, Part 2 and Requests for Production of Documents were served upon the above Defendant by First Class Mail at their respective address thereon, on the 27th day of January 2025.


Marcia Knapp-Stoll, Legal Secretary
Corporate Oversight Division
Michigan Dep't of Attorney General

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30736
LANSING, MICHIGAN 48909

DANA NESSEL
ATTORNEY GENERAL

January 27, 2025

Donald Peltier
356 Granby Road
South Hadley, MA 01075-2210

Re: Dana Nessel, Attorney General of The State of Michigan v Donald Peltier. Case No. 2024-830-CZ

Dear Mr. Peltier:

We've reviewed your December 20th, 2024, responses to the ATTORNEY GENERAL'S FIRST SET OF INTERROGATORIES, REQUESTS TO ADMIT, AND REQUESTS TO PRODUCE. The Attorney General's Discovery Requests require you to provide all non-objectionable documents and information.

The Attorney General's interpretation of your response is that you are refusing to answer any questions or provide any documents based on your assertion of your Fifth Amendment right. If that is not the case, supplement or amend accordingly.

We sent the enclosed second set of discovery requests to you on Jan. 10th, 2025 by certified mail. We've attached an additional copy. We aren't required to send it by certified mail. Here's a second copy sent by uncertified mail.

Normally, we'd take your deposition. However, if you intend on pleading the Fifth Amendment at the deposition, I think you asserting that objection for each answer to which it applies in this second set of discovery requests may be sufficient.

In addition, you've failed to submit initial disclosures as required by MCR 2.302 and should correct that immediately.

Sincerely,
/s/ Brien Winfield Heckman
Brien Winfield Heckman
Assistant Attorney General
Michigan Department of Attorney General
Corporate Oversight Division
(517) 335-7632
HeckmanB1@michigan.gov

STATE OF MICHIGAN
CIRCUIT COURT FOR THE 30TH JUDICIAL CIRCUIT
INGHAM COUNTY

DANA NESSEL, ATTORNEY GENERAL OF
THE STATE OF MICHIGAN,

Plaintiff,

No. 2024- 830 - CZ

v

HON. WANDA STOKES

DONALD PELTIER,

Defendant.

Brien Winfield Heckman (P76006)
Attorney for Plaintiff
Michigan Department of Attorney General
Corporate Oversight Division
P.O. Box 30736
Lansing, MI 48909
(517) 335-7632

**ATTORNEY GENERAL'S *SECOND* SET OF DISCOVERY REQUESTS
PART 1
REQUEST TO ADMIT**

NOW COMES the Michigan Department of Attorney General, by and through Assistant Attorney General Brien Winfield Heckman, who files the following requests to admit to be answered within 28 days from the date of service, separately and fully in writing under oath, pursuant to the Michigan Court Rules:

INSTRUCTIONS

Your answers are to include information that is available to you and/or information that can be obtained by you from employer(s), agents, representatives, accountants, private investigators, attorneys, lessees, sureties, and/or any other person(s), firm, corporation, or entity who is in possession of or who may have obtained information for or on behalf of you or with whom you have dealt in connection with the subject matter covered by these Discovery Requests. Demand is further made for production and attachment of all documents requested.

If any Discovery Request cannot be answered fully, please answer to the extent possible and explain why you are unable to answer fully.

If you object to any Discovery Request, answer the request by providing all non-objectionable documents and information. Then state your objection and its supporting facts.

When the identification of any document is requested, give the date, the identity of the author or addressor, the identity of the addressee, the identity of the person presently in custody, control or possession of the document, and the title and/or identifying code and state whether you will produce a copy on request without the necessity of a court order. In lieu of that identification, you may attach the documents to your answers to these Discovery Requests and state the present custodian of the record.

When the identification of any person is requested, please give the name, current address, and telephone number.

Please take notice that these Discovery Requests will be deemed to be continuing to require supplemental answers should you or anyone acting on your behalf obtain further information after the submission of answers that would tend to change, alter, or modify, wholly or in part, any such answer. Supplemental answers will be served on the undersigned counsel immediately on receipt of that information.

We will object to the introduction, use, and/or admission by you of any evidence at the trial of this matter that is responsive to this discovery request and that is not provided in response to this request.

DEFINITIONS

1. The terms document or documents include, without limitation, writings and printed matter of every kind and description, photographs, databases, checks, letters, envelopes, drawings, notes, e-mail, deleted e-mail, computer files, deleted computer files, and records (tape, disc, or other) of oral communications.
2. The terms person or persons include, without limitation, individuals, associations, partnerships, corporations, joint ventures, unions, and other organizations.
3. The term identify as used in connection with a "document" or "documents" means the following:
 - a. State the type of document (letter, agreement, memorandum, etc.), the date of the document, the name and address of the person originating the document, the name and address of the person, if any, to whom the document was addressed, the names

and addresses of all persons to whom copies of the document were to be, or have been, sent, and the firm or firms with which all such persons were associated at the date of the document;

b. State whether the original is within your access, custody, or control and identify each person in possession of the document or a copy; and

c. If you claim that any documents are privileged, (i) identify and describe each such document by date, author, and addressee; (ii) identify each person (other than stenographic or clerical assistants) participating in the preparation of the document; (iii) identify each person to whom the contents of the document have been communicated by copy, exhibition, reading, or summarization; (iv) provide a brief summary of the document's contents; and (v) state the privilege or privileges in sufficient detail so that the court may adjudicate the validity of the claim.

4. The term identify as used in connection with a "person" or "persons" means the following:

a. Regarding an individual, state the name, title, all phone numbers you have for that individual, present address (or, if unknown, the last known address), their last known employer, the exact duties and responsibilities of that individual, and

b. Regarding an association, partnership, corporation, joint venture, union, or other organization, (i) state the name of the organization, the address of the principal office, the state or country under whose law the organization is organized, and the address of any government agency where organizational records are filed and (ii) identify the person in charge of the principal office.

5. The term describe in detail means the following:

a. Describe fully by reference to underlying facts rather than by reference to ultimate facts or conclusions of fact or law;

b. To the extent possible, particularize as to time, place, and manner; and

c. Set forth all relevant facts necessary to the complete understanding of the act, process, event, or thing in question.

6. If any part of these Discovery Requests cannot be answered in full, answer to the extent and in the manner possible, using an estimate or stating your belief if exact figures, dates, methods, detailed records, or other information requested are not available and specifying if an estimate or belief rather than exact figures or statements have been used. Be as exact as possible. This does not absolve you of your obligation to search for information, documents, and others matters and materials to find the answer or document.
7. If you claim that any documents are lost or destroyed, (a) identify and describe each such document by date, author, and addressee and (b) provide a brief summary of its contents.
8. The term subject property refers to the real property that is the subject matter of your specific performance claim in the above-captioned case.

The words "you" mean and Donald Peltier include any business that Donald Peltier holds an ownership interest in, and representatives (including attorneys) and all other persons acting or purporting to act or that have acted on behalf of the same. It includes you in representative capacities, such as you working for another.

DISCOVERY REQUESTS

1. Request to Admit. You were the administrator of the website democractinationalcommittee.co.

ANSWER:

2. Request to Admit. You were the administrator of the website DEMOCRATIC.WEBSITE.

ANSWER:

3. Request to Admit. You were the administrator of the website KAMALA-HARRIS.ORG.

ANSWER:

4. Request to Admit. You were the administrator of the website NATIONALCOMMITTEE.DEMOCRAT.

ANSWER:

5. Request to Admit. You were the administrator of the website maf.democrat.

ANSWER:

6. Request to Admit. You were the administrator of the website REPUBLICANNATIONAL.NET.

ANSWER:

7. Request to Admit. You were the administrator of the website REPUBLICANNATIONALCOMMITTEE.NET

ANSWER:

8. Request to Admit. You were the administrator of the website REPUBLICANNATIONALCOMMITTEE.ORG.

ANSWER:

9. Request to Admit. You designed the above websites to obtain donations, directly through donation tabs on those websites, or indirectly by linking to a website with a donation tab.

ANSWER:

10. Request to Admit. You made representations on the above websites purporting to be a political candidate or party or affiliated with one.

ANSWER:

11. Request to Admit. You incorporated the representations referenced in paragraphs 9 and 10 of the complaint into the above referenced websites, including but not to "Partner With Us," "We're counting on our best supporters like you to help us stand up to Trump and the Republicans," "Show your Support ... Republicans are counting on your support to fight the Liberal agenda, hold the Democrats accountable, and support the America First agenda. We thank you for your generous contributions," and "@ Conservative Media Group."

ANSWER:

12. Request to Admit. You knew the above referenced representations were false when you made them.

ANSWER:

13. Request to Admit. You have utilized the following I.P. addresses since January 1st, 2020: 73.69.48.194, 115.118.128.202, and 10.32.84.116.

ANSWER:

14. Request to Admit. You obtained money through the donation tabs associated with the above referenced websites.

ANSWER:

15. Request to Admit. You attempted to obtain money using false pretenses on the above referenced websites.

ANSWER:

16. Request to Admit. Before the 2012 United States Presidential Election, you obtained donations through websites, including www.RepublicanNationalCommittee.org, by way of false representations of affiliation with a political party, candidate, or affiliate thereof.

ANSWER:

17. Request to Admit. You have utilized the following email: design@ingth.com.

ANSWER:

18. Request to Admit. You have utilized the following email: dpeltier@comcast.net.

ANSWER:

19. Request to Admit. You have utilized the following email: info@republicanpac.net.

ANSWER:

20. Request to Admit. You have utilized the following email: 021donald@comcast.net.

ANSWER:

21. Request to Admit. You have utilized the following email: paypal@maf.democrat.

ANSWER:

22. Request to Admit. You have utilized the following email:
cpa@ingth.com.

ANSWER:

23. Request to Admit. You have utilized the following email:
paypal@democraticnationalcommittee.org.

ANSWER:

24. Request to Admit. You have utilized the following financial
accounts and cards: Bank Account ending in 5207 routing
211871691

ANSWER:

25. Request to Admit. You have utilized the following financial
accounts and cards: Business debit MasterCard EMV US account
ending in 1997

ANSWER:

26. Request to Admit. You have utilized the following financial
accounts and cards: Credit or Debit Card ending in 9423

ANSWER:

ATTESTATION

"The answers to these Requests to Admit are true and accurate to the best of my knowledge, information, and belief."

Dated: _____ /s/ _____

DONALD PELTIER

STATE OF _____)
_____ COUNTY)

Signed and sworn to before me in _____ County, State of _____ on this _____ day of _____, 2024

/s/ _____

Notary Public's Name _____

Notary public, State of _____, County of _____.

My commission expires _____.

STATE OF MICHIGAN
CIRCUIT COURT FOR THE 30TH JUDICIAL CIRCUIT
INGHAM COUNTY

DANA NESSEL, ATTORNEY GENERAL OF
THE STATE OF MICHIGAN,

Plaintiff,

No. 2024- 830 - CZ

v

HON. WANDA STOKES

DONALD PELTIER,

Defendant.

Brien Winfield Heckman (P76006)
Attorney for Plaintiff
Michigan Department of Attorney General
Corporate Oversight Division
P.O. Box 30736
Lansing, MI 48909
(517) 335-7632

**ATTORNEY GENERAL'S *SECOND* SET OF DISCOVERY REQUESTS
PART II
INTERROGATORIES AND REQUEST TO PRODUCE**

NOW COMES the Michigan Department of Attorney General, by and through Assistant Attorney General Brien Winfield Heckman, who files the following interrogatories and requests to produce to be answered within 28 days from the date of service, separately and fully in writing under oath, pursuant to the Michigan Court Rules:

INSTRUCTIONS

Your answers are to include information that is available to you and/or information that can be obtained by you from employer(s), agents, representatives, accountants, private investigators, attorneys, lessees, sureties, and/or any other person(s), firm, corporation, or entity who is in possession of or who may have obtained information for or on behalf of you or with whom you have dealt in connection with the subject matter covered by these Discovery Requests. Demand is further made for production and attachment of all documents requested.

If any Discovery Request cannot be answered fully, please answer to the extent possible and explain why you are unable to answer fully.

If you object to any Discovery Request, answer the request by providing all non-objectionable documents and information. Then state your objection and its supporting facts.

When the identification of any document is requested, give the date, the identity of the author or addressor, the identity of the addressee, the identity of the person presently in custody, control or possession of the document, and the title and/or identifying code and state whether you will produce a copy on request without the necessity of a court order. In lieu of that identification, you may attach the documents to your answers to these Discovery Requests and state the present custodian of the record.

When the identification of any person is requested, please give the name, current address, and telephone number.

Please take notice that these Discovery Requests will be deemed to be continuing to require supplemental answers should you or anyone acting on your behalf obtain further information after the submission of answers that would tend to change, alter, or modify, wholly or in part, any such answer. Supplemental answers will be served on the undersigned counsel immediately on receipt of that information.

We will object to the introduction, use, and/or admission by you of any evidence at the trial of this matter that is responsive to this discovery request and that is not provided in response to this request.

DEFINITIONS

1. The terms document or documents include, without limitation, writings and printed matter of every kind and description, photographs, databases, checks, letters, envelopes, drawings, notes, e-mail, deleted e-mail, computer files, deleted computer files, and records (tape, disc, or other) of oral communications.
2. The terms person or persons include, without limitation, individuals, associations, partnerships, corporations, joint ventures, unions, and other organizations.
3. The term identify as used in connection with a "document" or "documents" means the following:
 - a. State the type of document (letter, agreement, memorandum, etc.), the date of the document, the name and address of the person originating the document, the name and address of the person, if any, to whom the document was addressed, the names

and addresses of all persons to whom copies of the document were to be, or have been, sent, and the firm or firms with which all such persons were associated at the date of the document;

b. State whether the original is within your access, custody, or control and identify each person in possession of the document or a copy; and

c. If you claim that any documents are privileged, (i) identify and describe each such document by date, author, and addressee; (ii) identify each person (other than stenographic or clerical assistants) participating in the preparation of the document; (iii) identify each person to whom the contents of the document have been communicated by copy, exhibition, reading, or summarization; (iv) provide a brief summary of the document's contents; and (v) state the privilege or privileges in sufficient detail so that the court may adjudicate the validity of the claim.

4. The term identify as used in connection with a "person" or "persons" means the following:

a. Regarding an individual, state the name, title, all phone numbers you have for that individual, present address (or, if unknown, the last known address), their last known employer, the exact duties and responsibilities of that individual, and

b. Regarding an association, partnership, corporation, joint venture, union, or other organization, (i) state the name of the organization, the address of the principal office, the state or country under whose law the organization is organized, and the address of any government agency where organizational records are filed and (ii) identify the person in charge of the principal office.

5. The term describe in detail means the following:

a. Describe fully by reference to underlying facts rather than by reference to ultimate facts or conclusions of fact or law;

b. To the extent possible, particularize as to time, place, and manner; and

c. Set forth all relevant facts necessary to the complete understanding of the act, process, event, or thing in question.

6. If any part of these Discovery Requests cannot be answered in full, answer to the extent and in the manner possible, using an estimate or stating your belief if exact figures, dates, methods, detailed records, or other information requested are not available and specifying if an estimate or belief rather than exact figures or statements have been used. Be as exact as possible. This does not absolve you of your obligation to search for information, documents, and others matters and materials to find the answer or document.
7. If you claim that any documents are lost or destroyed, (a) identify and describe each such document by date, author, and addressee and (b) provide a brief summary of its contents.
8. The term subject property refers to the real property that is the subject matter of your specific performance claim in the above-captioned case.

The words "you" mean and Donald Peltier include any business that Donald Peltier holds an ownership interest in, and representatives (including attorneys) and all other persons acting or purporting to act or that have acted on behalf of the same. It includes you in representative capacities, such as you working for another.

DISCOVERY REQUESTS

1. If your answer to any of the Requests to Admit in the ATTORNEY GENERAL'S *SECOND SET OF DISCOVERY REQUEST PART I* is anything other than an unequivocal admission, for each, describe in detail your position and identify all persons and documents that may support your position.

ANSWER:

2. Interrogatory. Identify all persons, including yourself, with knowledge of the facts that could be utilized to defend this case, describe in detail the potential testimony they can provide, and identify any documents that support their potential testimony.

ANSWER:

3. Interrogatory. For each paragraph in the complaint that you will present evidence to dispute, identify the paragraph, and for each, identify all persons, including yourself, with knowledge of the facts you will utilize to dispute, describe in detail the potential testimony they can provide in dispute the paragraph, and identify any documents that support their potential testimony.

ANSWER:

4. Request to Produce. Produce all documents that you intend to use to support or refute your defense in this case.

ANSWER:

5. Request to Produce. Produce all documents referenced or referred to in your responses to ATTORNEY GENERAL'S *SECOND SET OF DISCOVERY REQUEST PART I* and *PART II*.

ANSWER:

ATTESTATION

"The answers to these Interrogatories and the documents furnished in connection therewith are true and accurate to the best of my knowledge, information, and belief."

Dated: _____

/s/ _____

DONALD PELTIER

STATE OF _____)
_____ COUNTY)

Signed and sworn to before me in _____ County, State of _____ on this
_____ day of _____, 2024

/s/ _____

Notary Public's Name _____

Notary public, State of _____, County of _____.

My commission expires _____.