

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, ex rel.,  
MARCO WHITE, MARK MITCHELL,  
and LESLIE LAKEIND,

Plaintiffs,

Vs.

Case No. D-101-CV-2022-00473

COUY GRIFFIN,

Defendant

CERTIFICATE OF SERVICE

i Couy Griffin, hereby certify that the Interrogatory Discovery was sent to Plaintiffs listed by email in case #D-101-CV-2022-00473 on the date of August 2, 2022 to the following:

Joseph Goldberg  
Chris Dodd  
Debbie Tope  
Amber Fayerberg  
Donald Sherman  
Nikhel Sus  
Stuart McPhaul  
Daniel Small  
Eden Tadesse

Respectfully Submitted

  
Couy Griffin



## INTERROGATORIES

INTERROGATORY NO. 1: Please give a complete description, in chronological order, with dates and times, of all actions you took, communications you engaged in, or any other activity in which you were involved between January 3, 2021 and January 7, 2021. **During that time frame I was travelling with the Women for America First platform thru the south. I spoke at different events in different cities. All as a lead up to the rally at the Elipse on January 6<sup>th</sup>. I believe we arrived in Washington D.C. on January 5<sup>th</sup>. We walked around the city that evening, attended the rally at the Elipse and then the peaceful protest at the Capitol on the 6<sup>th</sup>. We left Washington DC on the evening of January 6<sup>th</sup> and stayed in Roanoke Virginia that evening. We then began the trip to San Diego CA in an attempt to pay our respects to the family of Ashlie Babbitt.**

INTERROGATORY NO. 2: Please identify each and every person (and provide contact information including telephone number, email address, and physical address) you have communicated with regarding the events of January 6, 2021, whether before, during, or after January 6, 2021. **I spoke publicly about the events of January 6<sup>th</sup> on our social media platform. I did not necessarily "communicate" with anyone about the events other than in casual conversations with friends and family. It is very hard for me to recollect though because I did not have any type of serious "communication" with anyone.**

INTERROGATORY NO. 3: Please state each and every reason why you traveled to Washington, D.C. for the events of January 6, 2021. **I travelled to Washington DC. because I was and still am concerned about election integrity. Through our investigations here in Otero County we have proven there to be discrepancies in our electorate. We have proof of these discrepancies which further validates the reason to travel to DC and participate in a peaceful protest. Only to bring attention to our concerns in a peaceful manner. That peaceful manner in which I conducted myself was further proved thru my acquittal on disruptive behavior and disorderly conduct charges.**

INTERROGATORY NO. 4: Please state each and every reason why you were present on the United States Capitol grounds on January 6, 2021. **I had no intention of even walking down to the Capitol on the morning of January 6<sup>th</sup>. I was contacted by a friend though that morning, Gary Chapman, who encouraged me to go pray with people at the Capitol. So that is the sole and only reason I walked down to the Capitol on the morning of January 6<sup>th</sup>. Was to go pray with people and by Gods grace I was afforded that opportunity.**

INTERROGATORY NO. 5: Please identify with specificity all methods or means by which you have communicated with others regarding the events of January 6, 2021 (e.g., text messages, phone calls, particular messaging applications, particular social media platforms, etc.). **I have spoken about January 6<sup>th</sup> at our monthly commission meeting around January 14<sup>th</sup>. I spoke at different times about January 6<sup>th</sup> on video recorded by Matt Struck. I spoke about January 6<sup>th</sup> in casual conversations over the phone.**

INTERROGATORY NO. 6: Please state each and every objective you hoped to achieve by being present on the United States Capitol grounds on January 6, 2021. **I just wanted to bring attention to the fact that our electorate is compromised and proven to be irregular. I just believe we can do more to**

**secure our electorate and wanted to convey that message. By attending a peaceful protest I wanted to bring attention to that.**

INTERROGATORY NO. 7: Please state each and every objective you understood that your fellow protestors hoped to achieve by being present on the United States Capitol grounds on January 6, 2021. **I believe the single objective that we wanted to achieve was to bring attention to what could be a very compromised electorate system**

INTERROGATORY NO. 8: Please describe your understanding of the purpose of the "Stop the Steal" movement. **My understanding is it was protests/rallies to only bring attention to any possible fraud that could be taking place in our electorate system. A place where ideas and information could come together to provide the means to seek out the truth.**

INTERROGATORY NO. 9: Please identify and state the current location of the cell phone(s) you used between September 1, 2020 and January 31, 2021, including the telephone number and service provider for each such cell phone. If you used more than one cell phone during this timeframe, please identify the dates on which you used each phone. **I only used one phone and that is the phone I currently have. I willingly allowed the FBI to search my phone on consent after my arrest on January 17<sup>th</sup>. They had possession of this phone until after my trial.**

INTERROGATORY NO. 10: Please identify and describe every phone call you made or received on or between January 1 and January 7, 2021, including the name, telephone number, and address of the person(s) on the other end of the telephone call, as well as a summary of the discussions that occurred during each call. **I truly wish I could answer this request but there is no way I can remember who I spoke to so long ago. I know I spoke to some media at different times but exactly who I have no idea.**

INTERROGATORY NO. 11: To the extent that you deny any of the Requests for Admission contained in these written discovery requests, please state for each such denial the reason and basis for your denial. **I haven't denied anything because there is absolutely nothing to hide. I only wish I could remember more to further validate my standing as attending a peaceful protest with absolutely no ill will nor malicious intent.**