

**IN THE CIRCUIT COURT OF THE TWELTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA
CIVIL DIVISION**

Michael T. Flynn,
Plaintiff,

v.

Case No.: 2023 CA 004264 NC

Jim Stewartson, *et al*,
Defendants.

_____ /

DEFENDANT'S NOTICE OF SERVING FIRST SET OF INTERROGATORIES

Defendant, JIM STEWARTSON, by and through his undersigned counsel, hereby gives notice of propounding his first set of interrogatories upon the Plaintiff, MICHAEL T. FLYNN, on December 14, 2024.

Dated: December 14, 2024

/s/ George A.D. Thurlow

George A.D. Thurlow, Esquire
FBN 1019960

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and proper copy of the foregoing document was served upon Jared Roberts, Esquire and Stephen French, Esquire on this 14th day of December, 2024

/s/ George A.D. Thurlow

George K. Rahdert, Esquire

FBN 213365

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Attorneys for Defendant, STEWARTSON

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**DEFENDANT'S FIRST REQUEST FOR ADMISSIONS TO PLAINTIFF
MICHAEL T. FLYNN**

Defendant, JIM STEWARTSON, by and through his undersigned attorney(s), direct this First Request for Admissions to Plaintiff, MICHAEL T. FLYNN, pursuant to Rule 1.370 of the Florida Rules of Civil Procedure. Plaintiff is requested in writing within thirty (30) days to admit or deny the follow statements:

1. You have been subjected to a substantial amount of negative press since 2016.
2. That substantial negative press you have been subjected to has caused third parties to refuse to deal with you in your business, trade, or profession.
3. You are currently undergoing psychiatric and/or psychological treatment.
4. You have obtained psychiatric and/or psychological treatment as a result of Defendant Jim Stewartson's conduct.
5. You have suffered a loss of income since January 1, 2020.
6. You have used or advocated for the use of violence as a method of political activism.
7. You met with Heinz-Christian Strache ("Strache") at some point in November or December 2016.

8. When you met with Stache, you knew that Strache is the head of Austria's far-right Freedom Party, which was established by former Nazis after World War II.
9. That during your military service, you or your direct subordinates gained intelligence on behalf of the United States government from prisoners.
10. That during your military service, you or your direct subordinates authorized the use of conduct beyond that authorized by US Law in order to obtain such intelligence from prisoners.
11. That during your time as Director of the Defense Intelligence Agency (DIA), DIA was engaged in interrogating detainees.
12. That in your political advocacy, you have interacted with groups and individuals that have espoused beliefs and ideologies similar to that of Nazis—such as antisemitism.
13. You are an acquaintance of Ivan Raiklin.
14. You and/or your business entities have employed Ivan Raiklin.
15. You advocated for the “Pence Card” theory—which asserted that Vice President Mike Pence held the power to unilaterally disqualify legitimate electors from six states and had the power to unilaterally reject certified election results.
16. The chants of “Kill Mike Pence” at the US Capitol on 2016 were directed at Mike Pence because he did not follow the “Pence Card” theory.
17. Killing Mike Pence was known to be a potential outcome of the Insurrection on January 6, 2021.
18. You were involved in promoting the Insurrection on January 6, 2021.
19. It was the intent of the Capitol rioters was to capture and assassinate elected officials in the United States government.
20. You and/or your business entities have employed Tracy “Beanz” Diaz.
21. Individuals or entities besides Jim Stewartson have identified you as being supportive of “white nationalism.”

22. That on or around July 24, 2016, you shared a link to a tweet from a user named Saint Bibiana (@30PiecesofAG_) who wrote “>Cnn implicated. ‘The USSR is to blame!’ ... Not anymore, Jews. Not anymore.” and posted the additional comment “The corrupt Democratic machine will do and say anything to get #NeverHillary into power. This is a new low.”
23. That, in August 2023, at a rally in Michigan, you remarked that there were only “thousands of” Jewish victims of the Holocaust and “not many guards,” and that parents “willingly” gave their children to the Nazis.
24. That, in August 2023, at a rally in Michigan, you implied that Jews could have fought off the Nazis by themselves.
25. That, at a rally for Don Bolduc’s US Senate campaign, you stated that conservative activists such as yourself were “being marched” to Nazi death camps and said that unlike Holocaust victims, you “would never get on that train.”
26. That, at a rally in Texas in November 2021 as part of the ReAwaken America Tour, you stated ““If we are going to have one nation under God, which we must, we have to have one religion.”
27. During your time as Director of the Defense Intelligence Agency, you were involved in the operations of the Guantanamo Bay Detention Camp.
28. You interacted with Jack Posobiec at the Guantanamo Bay Detention Camp.

29. A report issued in 2013 by Columbia University’s Institute on Medicine as a Profession (IMAP) concluded that there was “cruel, inhumane and degrading treatment and torture of detainees” at the Guantanamo Bay Detention Camp and that the US Government “continues to follow policies that undermine standards of professional conduct” with respect to interrogation, hunger strikes, and the reporting of abuse.

Dated: December 14, 2024

/s/ Craig A. Whisenhunt

Craig A. Whisenhunt, Esquire
FBN 81745

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and proper copy of the foregoing document was served upon Jared Roberts, Esquire and Stephen French, Esquire on this 14th day of December, 2024

/s/ George A.D. Thurlow

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DEFENDANT'S FIRST REQUEST FOR PRODUCTION TO PLAINTIFF
MICHAEL T. FLYNN

Defendant, JIM STEWARTSON, by and through his undersigned counsel, pursuant to Fla. R. Civ. P. 1.350, hereby requests that the Plaintiff, MICHAEL T. FLYNN, produce for inspection and/or copying the following documents, writings, papers, and other materials within thirty (30) days, at the offices of the undersigned attorneys for the Plaintiff: Ripley Whisenhint, PLLC, 8130 66th Street North, Suite 3, Pinellas Park, FL 33781 efile@rightingwrongsflorida.com craig@rightingwrongsflorida.com **and** Rahdert & Mortimer, PLLC, 535 Central Avenue, Suite 200, St. Petersburg, FL 33701 or by email to grahdert@rahdertlaw.com gthurlow@rahdertlaw.com, and tmccreary@rahdertlaw.com on or before that date.

1. As used herein, "Plaintiff," "you," and "your" refers to MICHAEL T. FLYNN.
2. As used herein, "Defendant" refers to JIM STEWARTSON.
3. "Document" shall mean each and every written, recorded, or graphic matter of any kind, type, nature, or description that is or has been in your possession, custody, or control, or of which you have knowledge, including, but not limited to, computer files, computer database, computer printouts, correspondence, electronic mail, memoranda, minutes, agendas, tapes, stenographic or handwritten notes, written forms of any kind, charts, blueprints, drawings, specifications, diaries, letters, telegrams, photographs, minutes, contracts (including all exhibits thereto), agreements, reports, surveys, data compilations of any kind, teletypes, telexes, telegrams, facsimiles, invoices, order forms, checks, drafts, statements, receipts, credit memos, reports, summaries, books, ledgers,

notebooks, schedules, transparencies, recordings, catalogs, advertisements, promotional materials, films, video tapes, audio tapes, brochures, pamphlets, transcripts, manuals, graphs, estimates, tabulations, logs, charts, books of account, financial statements, purchase orders, or any written or recorded materials of any other kind, however stored, recorded, produced, or reproduced, and also including, but not limited to, drafts or copies of any of the foregoing that contain any notes, comments, or markings of any kind not found on the original documents or that are not otherwise identical to the original documents. The term “document” shall include data stored, maintained or organized on computer or any other way electronically or magnetically.

4. “Statement” means any published writing—including but not limited to blog posts, social media posts, tweets, editorial pieces, text messages, and emails—or transcript of any speech that has been offered by You, your employees, or your agents.
5. “Person” shall mean any natural person or any corporation, partnership, associates, joint venture, firm, or other business enterprise or legal entity.
6. To “identify” a natural “person” or any reference to stating the “identity” of a natural “person” shall mean to state that person’s full name, business title or affiliation, employers, and last known address and telephone number.
7. To “identify” a “person” that is a business, organization, or group of persons or any reference to stating the “identity” of such “person” shall mean to state the full name of such business, organization, or group of persons, the form of the business, organization or group of persons (e.g., corporations, partnership, joint venture) and to “identify” a natural person who would have knowledge of the requested information.
8. “Identify” when used in reference to a “document” means to set forth following information:
 - a. A general description thereof (e.g., a letter, memorandum, report, etc.)
 - b. A brief summary of its contents;
 - c. The name and address of the custodian of the original;

- d. The name and address of the person(s) who drafted, prepared, compiled, and/or signed it; and
- e. Any other descriptive information necessary in order to adequately describe it in a subpoena duces tecum or a motion or request for production.

CLAIM OF PRIVILEGE

If you object to any document request or part thereof on the basis of a claim of attorney client or work product privilege, at the time of production you shall provide the requesting party with the following written information pertaining to such document, in compliance with Fla. R. Civ. P. 1.280(b)(5):

- a) The type of document (e.g., letter, memorandum, telegraph, photograph, reproduction);
- b) Its date, or if not dated, the date it was prepared or received;
- c) The author and addressee;
- d) The identity of the person or persons presently custodian thereof;
- e) A general description of its contents;
- f) The identity of each person who received a copy of such document and the relationship of such person to you;
- g) Whether such document contains or related to facts or opinions, or both;
- h) The nature of the privilege (e.g., work product, attorney-client, etc.) that you claim with respect to such documents.

FIRST REQUEST FOR PRODUCTION

1. All documents and exhibits you intend to introduce at trial.
2. All Form 1040 U.S. Federal Tax Returns you have filed for Tax Years 2014 to present.
3. All pleadings you have filed in any lawsuit you have initiated in the past ten (10) years that have included allegations of defamation.
4. Transcripts of any depositions that have been taken of you in any criminal or civil matter in the past ten (10) years.

5. All records of psychological treatment you have received since May 1, 2020.
6. All records that support that Defendant's conduct has caused you mental anguish.
7. All records that support that Defendant's conduct has damaged your reputation.
8. All records that support that Defendant's conduct has caused you humiliation.
9. All records that support that Defendant's conduct has caused you embarrassment.
10. All communications that you have had with Heinz-Christian Stache since November 1, 2016.
11. All communications you have had regarding the Holocaust.
12. All statements you have made about the Holocaust.
13. All statements you have made about "death camps."
14. All statements you have made about the "Jews," "Jewish" people, or the religion of Judaism.
15. All statements you have made regarding the United States of America having only one religion.
16. All statements you have made regarding the United States of America being a Christian nation.
17. All statements you have made advocating for violence as a form of political activism.
18. All records that are not otherwise classified regarding the interrogation of detainees during your time as Director of the Defense Intelligence Agency (DIA).
19. All statements and correspondence you had concerning Vice President Mike Pence and his role in certifying the results of the 2020 Presidential Election between November 1, 2020 and January 7, 2021.
20. All documents in your possession regarding the events in Washington, DC that took place January 6, 2021.

21. All correspondence and statements you made regarding the events of January 6, 2021.

Dated: December 14, 2024

/s/ Craig A. Whisenhunt

Craig A. Whisenhunt, Esquire
FBN 81745

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