

IN THE SUPREME COURT OF THE CHEROKEE NATION

Lynn Wilson, Roger Johnson, Carla Porter,)
William Pearson Charles Dale Hornbuckle,)
Ronnelle Patterson, James Wade Prater,)
Norman Crowe and Philip Viles,)
)
Petitioners,)
)
v.)
)
Cherokee Nation Election Commission)
)
Respondent.)

Case No. SC-2019-

CHEROKEE NATION
SUPREME COURT
KENDALL BIRD, COURT CLERK

2019 OCT -3 PM 3:12

FILED

REQUEST FOR PRODUCTION OF DOCUMENTS

In accordance with Rule 34 of Federal Rules for Civil Procedure, plaintiffs request that respondent produce for inspection and copying all the documents described herein which are in the possession, custody or control of respondent. Said production shall be made at the offices of:

Deborah A. Reed
Reed Legal, PLLC
3101 North Hemlock Circle, Suite 112B
Broken Arrow, Oklahoma 74012

within thirty (30) days of receipt of this request, or alternatively, respond in writing within said time as to why the documents cannot, should not, or will not be produced. The respondent will be referred to as CNEC. "Candidate" means any person who was a candidate for election during the 2019 calendar year. "Citizen letter" means the letter dated July 1, 2019 in which 68 registered Cherokee voters requested an audit of certain CNEC records, receipt of which was acknowledged by respondent in its answer filed herein.

DOCUMENTS TO BE PRODUCED

Request for Production No. 1:

The Designation of Financial Agent and any amendments filed by each candidate who filed for elective office in the 2019 election.

Request for Production No. 2:

All financial reports and any amendments filed by each candidate who designated Cherokee Future LLC as her/his Financial Agent in the 2019 election.

Request for Production No. 3:

The Minutes of each open meeting of CNEC during which the CNEC Commissioners, or any CNEC Commissioner, discussed or mentioned (a) the status of Cherokee Future LLC as a financial agent, as a vendor of services to a candidate, as a contributor to an election campaign of a candidate, or in any other context as it relates to an election conducted in 2019, or (b) the citizen letter.

Request for Production No. 4:

The Minutes of each closed meeting or executive session of CNEC during which the CNEC Commissioners, or any CNEC Commissioner, discussed or mentioned (a) the status of Cherokee Future LLC as a financial agent, as a vendor of services to a candidate, as a contributor to an election campaign of a candidate, or in any other context as it relates to an election conducted in 2019, or (b) the citizen letter.

Request for Production No. 5:

The visual or audio recording of any CNEC meeting referenced in Requests 3 and 4.

Request for Production No. 6:

All financial disclosure reports of any candidate that identified Cherokee Future LLC as a provider of any goods or services to that candidate, in any form whatsoever for the 2019 election.

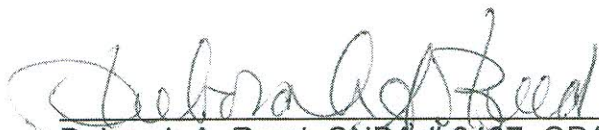
Request for Production No. 7:

The report of each audit of each financial disclosure report from the 2019 election, including the name, title and contact information of each person who performed the audit. As used in this request, report means any written or electronic document that describes and records the result of an audit.

Request for Production No.8:

Documents, whether written or electronic form, whereby the CNEC reported results of its audits of the Financial Disclosure Reports from the 2019 election, to the Cherokee Nation Attorney General.

Respectfully submitted this 3rd day of October.



Deborah A. Reed, CNBA # 0407, OBA #30693
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Attorneys for Petitioners

CERTIFICATE OF MAILING

I hereby certify that on October 3rd, 2019, I mailed the original of the above *Request for Production of Documents* to the following.

Harvey Chaffin
Attorney at Law
215 West Shawnee
Tahlequah, OK 74464
Email: hlchaffin@greencountryabstract.com

Wendy Reed

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