

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

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

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 filed with the Clerk of the First Judicial District for the County of Santa Fe in case # D-101-CV-2022-0047, on the date of July 30 2022; and caused the Interrogatory Discovery to be served on the date of July 30 2022, to the following:

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

Respectfully submitted,


Couy Griffin

phone # 

INTERROGATORIES

INTERROGATORIES INTERROGATORY NO. 12: Please identify each social media accounts you followed, subscribed to, or otherwise received automatic notifications from between September 1, 2020 and January 31, 2021. **I am not sure of these social media accounts. All of my social media has been taken down so I can't look back to see what accounts I had followed**

RESPONSE: INTERROGATORY NO. 13: Please identify each and every chatroom, email listserv, or other group communication forum to which you had access to or participated in between September 1, 2020 and January 31, 2021. **I can't remember ever being involved in any chatrooms. I have always tried to avoid group texts or chatrooms.**

RESPONSE: INTERROGATORY NO. 14: Please state whether you or Cowboys4Trump facilitated, aided, or paid for anyone to travel to Washington, DC in the days leading up to January 6, 2021, and describe such facilitation, aid, or payment. **I nor anyone involved with Cowboys for Trump ever paid for anyone elses travel to attend January 6th.**

RESPONSE: INTERROGATORY NO. 15: Please describe in detail any conversations you had with anyone about going to Washington, DC on January 20, 2021. **I spoke on the Women for America First platform around 10 days prior to January 6th where I spoke about going to attend the rally at the Elipse. My immediate family knew I was going to attend but I don't remember really reaching out or telling anyone else I was going**

RESPONSE: REQUESTS FOR PRODUCTION REQUEST NO. 10: Please produce any and all videos in your possession related to Cowboys4Trump created between January 1, 2020 to December 31, 2020. **I don't have any videos in my possession. Matt Struck was the one who took videos and posted videos. I have very limited technical ability and Matt is very gifted in that regard. He took many videos in his own private capacity.**

REQUEST NO. 11: Please produce all documents or records of communications in your possession that relate in any way to the suspension or termination of any social media accounts belonging to you or Cowboys4Trump. **I don't have any of that information. When I looked at my facebook account and it said I was blocked I did not petition for any accounts to be turned back on. Same goes for my Twitter account.**

RESPONSE: REQUEST NO. 12: Please produce all notes, letters, memos, journal entries, or diary entries you wrote at any time concerning your travel to Washington, DC or the events that occurred in

Washington, DC on January 6, 2021. **I don't have any paper documentation concerning letters or journal entries that pertain to my trip to Washington DC**

RESPONSE: REQUEST NO. 13: Please produce all documents, including copies of all written, oral, or other recorded communications between yourself and any other person(s), between September 1, 2020 through January 31, 2021, related to carrying firearms to or within Washington, DC. **The only time I spoke publicly or privately about taking firearms with me in my car as at the county commission meeting found at this link <https://youtu.be/dyOkimYmvr4> The only reason I said I was taking firearms was for my own personal protection and I did not take these firearms with me into Washington DC. That would have been not only foolish but against the law.**

RESPONSE: REQUEST NO. 14: Please produce all documents, including copies of all written, oral, or other recorded communications between yourself and any other person(s), between September 1, 2020 through January 31, 2021, regarding the use or potential use of force related to the results of the 2020 presidential election. **I never had intent or spoke of any type of "force" related in or around January 6th. I never spoke of violence or intended to be a part of any type of violence.**

REQUEST NO. 15: Please produce all documents, including copies of all written, oral, or other recorded communications between yourself and any other person(s), between September 1, 2020 through January 31, 2021, regarding "Stop the Steal" and/or the certification of the 2020 presidential election. I just searched Stop the Steal on my cel phone and this was the only message I have. This was sent by a lady named Julia who I met years ago while serving in the ministry.

Praise the Lord, Couy! I just listened to a video of you rallying for America and Trump in Birmingham on your way to the Stop the Steal gathering in DC. I'm so proud of you and your stand for America! Thanks for serving in elected office!! (I worked for an elected official for years and helped get godly individuals elected.) I will be in DC on the 6th too with some missionaries and intercessors. I would so appreciate connecting with you after all these years. Perhaps we could meet up at some point in time by locating each other through our cell phones. I'll be staying at the Hyatt the 5th and 6th leaving in the afternoon of the 7th. I'm savoring fond memories of our Glory Ride experience and hope to see you face to face. Love and blessings to you and yours.

RESPONSE: REQUEST NO. 16: Please produce all documents you may seek to present or rely upon at the trial of this case. **At this time I don't have any documents that I'm aware of that I am planning on producing**

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 93: Admit that, on January 6, 2021, tens of thousands of people went to Washington, DC for the purpose of stopping the transfer of presidential power from Donald Trump to Joe Biden including through intimidation, coercion, or violence, by preventing the certification of the electoral college vote in Congress or through other means. **Deny**

REQUEST FOR ADMISSION NO. 94: Admit that, on January 6, 2021, you went to Washington, DC for the purpose of stopping the transfer of presidential power from Donald 5 Trump to Joe Biden including

through intimidation, coercion, or violence, by preventing the certification of the electoral college vote in Congress or through other means. **Deny**

REQUEST FOR ADMISSION NO. 95: Admit that individuals who went to the Capitol on January 6, 2021 planned to use violence to oppose the transfer of presidential power from Donald Trump to Joe Biden, either by preventing the certification of the electoral college vote or other means. **Admit**

REQUEST FOR ADMISSION NO. 96: Admit that individuals, who went to the Capitol on January 6, 2021 to prevent the transfer of presidential power from Donald Trump to Joe Biden, carried firearms. **I guess. From what I've read there was a conviction in the case of Guy Reffitt where he apparently had a firearm. I never saw any firearms on that day though**

REQUEST FOR ADMISSION NO. 97: Admit that you knew, prior to January 6, 2021, that individuals who planned to go to Washington, DC on January 6, 2021 had declared a credible intention to use violence to prevent the transfer of power from Donald Trump to Joe Biden, by preventing the certification of the electoral college vote in Congress, or through other means. **Deny**

REQUEST FOR ADMISSION NO. 98: Admit that you knew, prior to January 6, 2021, that individuals had in fact used violence or threats of violence to attempt to prevent the transfer of presidential power from Donald Trump to Joe Biden. **Deny**

REQUEST FOR ADMISSION NO. 99: Admit that you encouraged and solicited individuals to go to Washington DC on January 6, 2021, for the purpose of stopping the transfer of presidential power from Donald Trump to Joe Biden including through intimidation, coercion, or violence, by preventing the certification of the electoral college vote in Congress, or through other means. **Deny**

REQUEST FOR ADMISSION NO. 100: Admit that, on and around January 6, 2021, you believed that, if after other means were exhausted and violence were the only means to prevent the transfer of presidential power from Donald Trump to Joe Biden, then violence was an acceptable and justified means to achieve that end. **Deny**

REQUEST FOR ADMISSION NO. 101: Admit that, on January 6, 2021, at approximately 1 p.m., individuals seeking to stop the transfer of presidential power from Donald Trump to Joe Biden, breached the security perimeter around the U.S. Capitol set up by Capitol police through the use of violence. **At the time I did not know there had been any violence. Now seeing the documented evidence I would admit that there was violence. I did not know that at the time though**

REQUEST FOR ADMISSION NO. 102: Admit that, on January 6, 2021, at approximately 2 p.m., individuals breached the Capitol building by breaking and entering. **I would admit that some individuals entered violently but many individuals are now proven to have been waved in by Capitol Police Officers. Also the 20k lb, magnetic lock front door was opened from someone inside a secured area in the Capitol.**

REQUEST FOR ADMISSION NO. 103: Admit that on January 6, 2021, between approximately 1 pm and 6 pm, individuals used violence, threats of violence, intimidation, and coercion against Capitol police officers, severely injuring multiple officers. **I have been made aware of that now but at the time I did not know that was going on.**

REQUEST FOR ADMISSION NO. 104: Admit that the law enforcement officers defending the U.S. Capitol building appeared to be overwhelmed by the amount of people in and around the Capitol complex on

January 6, 2021. **I have been aware of that now but on the day of I had no contact with any capitol police officers.**

REQUEST FOR ADMISSION NO. 105: Admit that, on January 6, 2021, at approximately 2:20 p.m., both the Senate and the House were called to recess, preventing and obstructing the process of certifying the electoral college vote until approximately 8 p.m., due to the unlawful presence of individuals including those seeking to use violence, intimidation, coercion, and other means to prevent the transfer of presidential power from Donald Trump to Joe Biden in the Capitol. **Admit, but I wasn't a part of that**

REQUEST FOR ADMISSION NO. 106: Admit that, on January 6, 2021, at points between approximately 2:31 pm and 4:47 p.m., you were on Capitol grounds, were on the inaugural stage, and could see individuals fighting to enter the Capitol building. **Deny. I could not see inside the west tunnel from my vantage point**

REQUEST FOR ADMISSION NO. 107: Admit that, on January 6, 2021, while on the grounds of the Capitol, you heard or saw individuals use violence, threats of violence, intimidation, or coercion in their attempts to prevent the transfer of presidential power from Donald Trump to Joe Biden, and that you applauded or praised such violence, threats of violence, intimidation, or coercion. **Deny**

REQUEST FOR ADMISSION NO. 108: Admit that your intent, on January 6, 2021, by being present on Capitol grounds that day was to stop, prevent, or delay the transfer of presidential power from Donald Trump to Joe Biden including through intimidation, coercion, or violence, regardless of whether the certification of the electoral college vote occurred before you entered the grounds of the Capitol. **Deny**

REQUEST FOR ADMISSION NO. 109: Admit that, after January 6, 2021, you praised, defended, and justified the events of January 6, including the use of violence, threats of violence, intimidation, and coercion, for the purpose of encouraging or soliciting others to engage in future acts of violence, threats of violence, intimidation, or coercion to prevent the transfer of presidential power from Donald Trump to Joe Biden. **Deny**

REQUEST FOR ADMISSION NO. 110: Admit that, after January 6, 2021, you planned to use violence, threats of violence, intimidation, and coercion to prevent the transfer of presidential power from Donald Trump to Joe Biden, by disrupting the presidential inauguration set for January 20, 2021 or by other means. **Deny**

REQUEST FOR ADMISSION NO. 111: Admit that while you were present on the grounds of the United States Capitol on January 6, 2021 during the events that occurred on that date, you smelled chemical irritants such as tear gas or pepper spray. **Admit, It was only when we were leaving on our own accord by our own will did I ever smell any type of irritants.**

REQUEST FOR ADMISSION NO. 112: Admit that while you were present on the grounds of the United States Capitol on January 6, 2021 during the events that occurred on that date, you witnessed groups of individuals attempting to breach and in fact breaching the Capitol building through the use of violence that overwhelmed the law enforcement officers protecting the Capitol and the persons inside. **Deny**

REQUEST FOR ADMISSION NO. 113: Admit that after you were present on the grounds of the United States Capitol on January 6, 2021 during the events that occurred on that date, you remained beyond

security barriers while protesters were attempting to breach the Capitol building. **Admit, yet I did not know it was an unauthorized zone**

REQUEST FOR ADMISSION NO. 114: Admit that your decision to travel from New Mexico to Washington, DC to attend the protests that occurred on January 6, 2021, and to enter the grounds of the United States Capitol that day was not coerced or compelled. **Deny, I was compelled to go pray with those in attendance.**

REQUEST FOR ADMISSION NO. 115: Admit that your decision to travel from New Mexico to Washington, DC to attend the protests related to the presidential inauguration on January 20, 2021 was not coerced or compelled **Deny, I was compelled by The Holy Spirit to attend.**

REQUEST FOR ADMISSION NO. 116: Admit that your Twitter account @ridewithC4T was suspended in January 2021 for violating Twitter's policies related to incitement of violence. **Deny, this was not my Twitter Account. This was Matt Strucks personal account**

REQUEST FOR ADMISSION NO. 117: Admit that the video found in the enclosed flash drive, titled Exhibit 65 IMG_9564, is a true and accurate recording of some of your activities, statements, and interactions on the morning of January 6, 2021. **I can't get my computer to open the video**

REQUEST FOR ADMISSION NO. 118: Admit that the video found in the enclosed flash drive, titled Exhibit 66 IMG_9607, is a true and accurate recording of some of your activities, statements, and interactions on the morning of January 6, 2021. **The flash drive won't play**

REQUEST FOR ADMISSION NO. 119: Admit that the video found in the enclosed flash drive, titled Exhibit 69 IMG_9698, is a true and accurate recording of a conversation between you and Matthew Struck shortly after the events of January 6, 2021. **I can't get the flash drive to play**

REQUEST FOR ADMISSION NO. 120: Admit that the video at the following web link is a true and accurate recording of statements made by you at a March 2022 event:
<https://www.youtube.com/watch?v=JWNvtsXQsKw>. **I cannot verify this video because it is posted on youtube and may have been corrupted thru editing.**

Admit that the video at the following web 12 link is a true and accurate recording of statements made by you at a November 2020 Otero County Commission Special Meeting:
<https://www.youtube.com/watch?v=hwxcsfp4p9Y&t=14727s>. **I cannot state it is a true and accurate recording because the audio may have been altered thru editing. It is posted on a public site where hackers could have manipulated the sound.**

REQUEST FOR ADMISSION NO. 122: Admit that the video at the following web link is a true and accurate recording of statements made by you at a December 2020 Otero County Commission Special Meeting:
https://www.youtube.com/watch?t=3747&v=9xClOI_94ZA&feature=youtu.be. **I do not know if it is true and accurate because it is on a public and unsecured forum and could have been manipulated thru the editing process**

REQUEST FOR ADMISSION NO. 123: Admit that in 2020, you told gathered listeners at an event that "I've come to a place where I've come to the conclusion that the only good Democrat is a dead Democrat." **As I later said just after "I mean that only in the political sense and not in the physical. I can already tell**

how people will twist this to say I want to murder all the Democrats” Play the full clip and you will see.

REQUEST FOR ADMISSION NO. 124: Admit that on April 20, 2020, you tweeted from your @RideWithC4T Twitter account a video of you stating “If there’s political leaders such as governors...y’all better start paying real close attention, because we’re moving to you. And you better make sure that you haven’t been doing anything where you would be guilty of the charge of treason, because I don’t care if you are a governor, you can still swing at the end of a rope.” **@RideWithC4T was not a social media account that belonged to me nor that I managed.**

REQUEST FOR ADMISSION NO. 125: Admit that on April 20, 2020, you tweeted from your @RideWithC4T Twitter account a video of you stating “If we have political leaders in our country today... that are guilty of treason, which is to directly undermine the United States of America...such things like the Mueller Report... all this fake stuff that was constructed to try to destroy our president and in turn bring our nation down in my opinion is treason in its truest form. Treason is punishable by death.” .” **@RideWithC4T was not a social media account that belonged to me nor that I managed.**

REQUEST FOR ADMISSION NO. 126: Admit that on April 26, 2020, you tweeted from your @RideWithC4T Twitter account a video of you stating “They’re gonna milk this coronavirus deal as long as they possibly can...Maybe they’re doing it because some of them might be guilty of treason, and treasons a hanging offense. I don’t know why they’re doing it, but they’re doing it, and we can’t let them win. We’ve gotta fight back; we’ve gotta push back.” **@RideWithC4T was not a social media account that belonged to me nor that I managed**

REQUEST FOR ADMISSION NO. 127: Admit that on April 26, 2020, you tweeted from your @RideWithC4T Twitter account “I ask you state police officers - I hope you watch this video; I hope it’s shared with the governor - don’t start a war. Don’t come out and think you’re going to shut businesses down...because if you do, I’d be willing to bet the rent that Sheriff Tony Mace and his deputies are going to make sure that doesn’t happen.” **@RideWithC4T was not a social media account that belonged to me nor that I managed**

REQUEST FOR ADMISSION NO. 128: Admit that on March 28, 2020, you tweeted from your @RideWithC4T Twitter account “If a man wants to put an army together, that’s where you would put it together at, through all of our hunters. Y’all are the guys that can protect our borders and get our Country back. That’s why that email list is so critical. That’s why it doesnt need to get in the hands of some globalist.” **@RideWithC4T was not a social media account that belonged to me nor that I managed**

REQUEST FOR ADMISSION NO. 129: Admit that on May 3, 2020, you tweeted from your @RideWithC4T Twitter account “Don’t allow the state police to operate inside of your county unconstitutionally. And if y’all don’t have enough deputies to get the job done, call on us, because there’s a lot of us ready. Form a sheriff’s posse. We’re ready. I’d rather push back now than later.” .” **@RideWithC4T was not a social media account that belonged to me nor that I managed**

REQUEST FOR ADMISSION NO. 130: Admit that on May 3, 2020, you tweeted from your @RideWithC4T Twitter account “It might be a lead up to a civil war and if we do have a civil war over this, maybe that’s

gonna be the uniforms. Maybe one of the uniforms will have masks on and the other ones won't."

@RideWithC4T was not a social media account that belonged to me nor that I managed

REQUEST FOR ADMISSION NO. 131: Admit that the below image is a true and accurate depiction of a May 10, 2020 tweet by you from the @CouyGriffinC4T Twitter account, viewable at

<https://twitter.com/CouyGriffinC4T/status/1259669617246482432?s=19>. **I do not remember this account nor do I remember writing this tweet**

REQUEST FOR ADMISSION NO. 132: Admit that the below image is a true and accurate depiction of a December 25, 2020 tweet by you from the @CouyGriffinC4T Twitter account. **I do not remember this account nor do I remember writing this tweet**

REQUEST FOR ADMISSION NO. 133: Admit that the below image is a true and accurate depiction of an April 30, 2020 tweet by you from the @CouyGriffinC4T Twitter account, viewable at <https://twitter.com/CouyGriffinC4T/status/1255839742366752770>. **I do not remember this account**

REQUEST FOR ADMISSION NO. 134: Admit that the below image is a true and accurate depiction of a June 10, 2020 tweet by you from the @CouyGriffinC4T Twitter account, viewable at <https://twitter.com/CouyGriffinC4T/status/1255839742366752770>. **I do not remember this account**

REQUEST FOR ADMISSION NO. 135: Admit that the below image is a true and accurate depiction of a November 5, 2020 tweet by you from the @CouyGriffinC4T Twitter account, viewable at <https://twitter.com/CouyGriffinC4T/status/1255839742366752770>. **I do not remember this account**

REQUEST FOR ADMISSION NO. 136: Admit that the below image is a true and accurate depiction of an April 18, 2020 tweet by you from the @CouyGriffinC4T Twitter 19 account, which you posted and which is viewable at <https://twitter.com/CouyGriffinC4T/status/1245215030146002945>. **I do not remember this account**

REQUEST FOR ADMISSION NO. 137: Admit that the video at the following web link is a true and accurate recording of statements made by you, actions taken by you, and conditions observed by you on the morning of January 6, 2021: <https://twitter.com/brunolp30/status/1346813917889253377>. **I can't see the video because I don't have a twitter account**

REQUEST FOR ADMISSION NO. 138: Admit that the video in the enclosed flash drive, titled 2022.06.09 Jan 6 Committee Hearing Video Exhibit, is a true and accurate compilation of recordings of the events that transpired at the U.S. Capitol building on January 6, 2021. **I can't get the flash drive player to play**

REQUEST FOR ADMISSION NO. 139: Admit that the video in the enclosed flash drive, titled Exhibit 73 USCP compilation (entire), is a true and accurate compilation of recordings of the events that transpired at the U.S. Capitol building on January 6, 2021. **I can't get the flash drive player to play**

REQUEST FOR ADMISSION NO. 140: Admit that the video at the following web link is a true and accurate recording of your statements and/or actions during the July 1, 2022 Otero County Commission meeting: **I cannot verify this video because it was posted on a public site that could have been edited or changed.**

REQUEST FOR ADMISSION NO. 141: Admit that the below image is a true and accurate depiction of a March 3, 2022 tweet by you from the @CowboyCouy Twitter account, viewable

<https://twitter.com/CowboyCouy/status/1499390154112442372> **This was my Twitter handle at one time but I don't recall making this tweet and sure don't remember the details it contains. This tweet may have been edited or changed**

REQUEST FOR ADMISSION NO. 142: Admit that the below image is a true and accurate depiction of a March 16, 2022 tweet by you from the @CowboyCouy Twitter account, viewable at <https://twitter.com/CowboyCouy/status/1504114081602707465> **This was my Twitter handle at one time but I don't recall making this tweet and sure don't remember the details it contains. This tweet may have been edited or changed**

REQUEST FOR ADMISSION NO. 143: Admit that the below image is a true and accurate depiction of a May 19, 2022 tweet by you from the @CowboyCouy Twitter account, viewable at <https://twitter.com/CowboyCouy/status/1527328977278599168> **This was my Twitter handle at one time but I don't recall making this tweet and sure don't remember the details it contains. This tweet may have been edited or changed**

REQUEST FOR ADMISSION NO. 144: Admit that the video at the following web link is a true and accurate recording of your statements or actions on the morning of January 6, 2021 in the presence of Jacob Lang: **I can't see the video because I don't have a Twitter account anymore**

REQUEST FOR ADMISSION NO. 145: Admit that the video at the following web link is a true and accurate recording of the actions of Jacob Lang, dressed in black leather jacket on the left side of the image swinging a baseball bat at police officers, at the U.S. Capitol building on January 6, 2021: **I can't see the video because I don't have a Twitter account anymore**

REQUEST FOR ADMISSION NO. 146: Admit that the below image is a true and accurate depiction of Jacob Lang, dressed in a black leather jacket, on January 6, 2021: **I cannot say this is a true and accurate depiction because this photo may have been edited or changed**