STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY
BRANCH 8

KHARY PENEBAKER; MARY ARNOLD; and BONNIE JOSEPH,

Plaintiffs,

v.

ANDREW HITT; ROBERT F. SPINDELL, JR.; BILL FEEHAN; KELLY RUH; CAROL BRUNNER; EDWARD SCOTT GRABINS; KATHY KIERNAN, DARRYL CARLSON; PAM TRAVIS; MARY BUESTRIN; JAMES R. TROUPIS; KENNETH CHESEBRO; and ABC DEFENDANTS,

Defendants,

and

STATE FARM FIRE AND CASUALTY COMPANY,

Intervenor.

Case No. 22CV001178

Case Code: 30106; 30701; 30956

PLAINTIFFS' UNREDACTED BRIEF IN SUPPORT OF MOTION TO COMPEL DISCOVERY FROM DEFENDANT KENNETH CHESEBRO

INTRODUCTION

Defendant Kenneth Chesebro has almost entirely refused to comply with his discovery obligations in this case. Chesebro has refused to answer a single interrogatory. He has refused to answer most requests for admission. And, as relevant to this motion, Chesebro has flatly refused to provide even a single page in response to Plaintiffs' requests for production of documents (RFP), in violation of his obligations under Wis. Stat. § 804.09(b).

Instead of complying with his discovery obligations, Chesebro made a blanket assertion of his Fifth Amendment right against self-incrimination in response to each and every document request. In Chesebro's view, "the Fifth Amendment privilege protects against the compelled production not just of incriminating testimony, but of any incriminating evidence." (Ex. B, Answer to RFP No. 1 (citation omitted)). Chesebro's position is inconsistent with the text of the Amendment—which protects against being a "*witness*"—and has been squarely and repeatedly rejected by the Supreme Court. *E.g.*, *United States v. Hubbell*, 530 U.S. 27, 35 (2000) (noting the "settled proposition that a person may be required to produce specific documents even though they contain incriminating assertions of fact or belief"). The Fifth Amendment simply does not provide a blanket shield against production of documents.

To be sure, there are "quite limited and unusual" situations when production of physical evidence such as documents might implicate the Fifth Amendment. *State v. Gonzalez*, 2014 WI 124, ¶16, 359 Wis. 2d 1, 856 N.W.2d 580. But this exception is in cases where the act of production is itself testimonial. And Chesebro's cursory and categorical assertion of the Fifth Amendment privilege provides no basis for concluding that it is relevant to the document requests at issue in this civil case.

In any event, Chesebro's categorical assertion of the privilege as a basis to refuse to provide *any* documents whatsoever in response to *any* document request is not made in good faith. A party does not have "carte blanche by virtue of the Fifth Amendment's self-incrimination clause to refuse to answer questions." *In re High Fructose Corn Syrup Antitrust Litig.,* 295 F.3d 651, 663 (7th Cir. 2002). Instead, a party invoking the privilege must do so narrowly and with respect to particular questions, and respond fully where the privilege is not applicable.

It is not Plaintiffs' burden to disprove every assertion of privilege: it is Chesebro's burden to demonstrate that the privilege applies. And his universal refusal to provide any documents—coupled with his shifting rationales—indicates that he is not asserting the privilege in good faith. Indeed, there are some categories of documents requested to which no colorable Fifth Amendment privilege claim attaches. For example, Chesebro has refused to provide any of the documents he provided to the House Select Committee to Investigate the January 6th Attack on the United States Capitol (Select Committee), which were requested in Plaintiffs' first requests for production of documents. Chesebro's production of those same documents to the non-governmental Plaintiffs in this civil case could not possibly increase his incrimination risk. This and other examples discussed below put the lie to his privilege claims.

Chesebro's abuse of the Fifth Amendment privilege and near-total noncompliance with discovery has significantly prejudiced Plaintiffs as they attempt to litigate their case. Chesebro should be ordered to immediately comply with Plaintiffs' requests for production of documents or face the sanctions set forth in Wisconsin law, Wis. Stat. § 804.12, up to and including entry of default judgment in Plaintiffs' favor. *Grognet v. Fox Valley Trucking Serv.*, 45 Wis. 2d 235, 240–41, 172 N.W.2d 812 (1969) (holding, in context of an assertion of the Fifth Amendment, that if "defendants wrongfully refuse to give evidence within their knowledge of their actions, such action would amount to the obstruction of the administration of justice and their answer may be stricken and a default judgment entered for such conduct").

BACKGROUND

Plaintiffs brought this lawsuit against Chesebro and his co-defendants for their scheme to submit fraudulent electoral votes to Congress, overriding the will of the people of Wisconsin. As set forth in detail in the Amended Complaint, Chesebro was heavily involved in this scheme. He

worked closely with co-defendant Troupis and other co-conspirators to devise the fraudulent elector scheme, draft fraudulent certificates, recruit the fraudulent electors to meet and sign the documents, and then transmit the fraudulent certificates to Congress. In fact, there are some 1,800 entries on Troupis's privilege log (itself the subject of motion practice as an abuse of Wisconsin discovery law) that involve a communication with Chesebro as a participant (Ex. G).

Plaintiffs served 38 requests for production of documents on Chesebro (Ex. A),[1] and Chesebro served his responses a month later. In response to all but one Request for Production,[2] Chesebro objected by referencing the Fifth Amendment (Ex. B). For months, Plaintiffs have attempted to negotiate the production of documents, but have yet to receive a single page, requiring Plaintiffs to file this motion (Mead Aff. ¶¶ 3-4, 11).[3]

LEGAL STANDARD

"The right to discovery is an essential element of our adversary system" because "the purpose of discovery is identical to the purpose of our trial system—the ascertainment of truth." *Sands v. Whitnall Sch. Dist.*, 2008 WI 89, ¶¶18–19, 312 Wis. 1, 754 N.W. 2d 439 (citation and

[1] The requests for production of documents are numbered up to 43, but five of the requests were directed only at co-defendants and not at Chesebro.

[2] In response to Request for Production Number 43, which asked for evidence of an attorney-client relationship should any other discovery request be objected to on the basis of the attorney-client privilege, Chesebro stated "This document production request is currently inapplicable." (Ex. B).

[3] Chesebro also invoked the Fifth Amendment as a basis for refusing to respond to most of the Plaintiffs' First Set of Requests to Admit. However, Wisconsin law makes clear that "[a]ny admission made by a party under this section is for the purpose of the pending action only and is not an admission for any other purpose nor may it be used against the party in any other proceeding." Wis. Stat. § 804.11(2). Because *this* proceeding is not a "criminal case," U.S. Const. am. V; Wis. Const. Art. I § 8(1), the privilege does not apply. By failing to provide an appropriate answer within 30 days to most of Plaintiffs' First Set of Requests to Admit, those requests are deemed "admitted." Wis. Stat. § 804.11(1)(b).

internal quotation marks omitted). "[O]verly broad claims of evidentiary privilege" pose a threat to a litigant's ability to ascertain such truth, and, accordingly, "privileges are the exception, not the rule." *Id.* ¶¶21–22 (citation and alternations omitted). "Evidentiary privileges . . . interfere with the trial's search for the truth, and must be strictly construed, consistent with the fundamental tenet that the law has the right to every person's evidence." *Id.* ¶21 (quoting *State v. Echols*, 152 Wis. 2d. 725, 736–37, 449 N.W.2d 320 (Ct. App. 1989)).

ARGUMENT

I. Chesebro Has Not Met His Burden of Establishing that the Fifth Amendment Privilege Applies.

A. The Fifth Amendment does not permit the withholding of documents simply because they are incriminating.

The Fifth Amendment provides that "[n]o person . . . shall be compelled in any criminal case to be a witness against himself." U.S. Const. amend. V; *see also* Wis. Const. Art. I, § 8(1) (similar).[4] The Amendment's text protects against being forced to be "a witness" in a criminal case; it says nothing about the production of documents. Indeed, it is a "settled proposition that a person may be required to produce specific documents even though they contain incriminating assertions of fact or belief." *Hubbell*, 530 U.S. at 35–36. A party may not withhold documents "merely because the demanded documents contained incriminating evidence, whether written by others or voluntarily prepared by himself." *Id.* at 36; *see also, e.g.*, *United States v. Ponds*, 454 F.3d 313, 323 (D.C. Cir. 2006) (noting that the actual "contents of the documents are irrelevant for constitutional purposes because their preparation was not 'compelled'").

[4] Wisconsin courts follow federal case law in interpreting Wisconsin's self-incrimination clause. *Gonzalez*, 2014 WI 124, ¶6 n.6. This brief uses "Fifth Amendment" as a shorthand to refer to both constitutional provisions.

The privilege applies to document production only in the most limited circumstances. When the "act of production itself" has an incriminating and testimonial aspect, a party may invoke a Fifth Amendment privilege. *Hubbell*, 530 U.S. at 36–37; *accord Gonzalez*, 2014 WI 124, ¶16. Thus, if producing the documents constitutes "testimony" that "establish[es] the existence, authenticity, and custody of items that are produced," the Fifth Amendment may apply. *Hubbell.* 530 U.S. at 41. This inquiry is entirely "distinct from the question whether the unprotected contents of the documents themselves are incriminating." *Id*. at 37. If production of the documents does not itself convey incriminating testimony about the documents' existence, authenticity, or custody, then "'no constitutional rights are touched. The question is not of testimony but of surrender.'" *Fisher v. United States*, 425 U.S. 391, 411 (1976) (quoting *In re Harris*, 221 U.S. 274, 279 (1911)).

"[T]he factual scenarios in which physical evidence has a 'testimonial aspect' sufficient to implicate constitutional protections are quite limited and unusual." *Gonzalez*, 2014 WI 124, ¶16. Thus, for example, a demand that a party produce all confidential business records in their possession that were stolen from a competitor would compel them to admit that they in fact *possessed* stolen contraband, which is itself a crime. In contrast, a demand that a party turn over a copy of a fraudulent tax form filed with the government likely would not require incriminating *testimony*, although it does require providing incriminating *evidence*. *Cf. Fisher*, 425 U.S. at 397.[5] Instead, in order to have a valid Fifth Amendment objection to production of documents,

[5] In this regard, Plaintiffs are not seeking to compel responses to interrogatories because requiring a response would compel the production of a new writing. Instead, the appropriate response to a civil litigant's assertion of the Fifth Amendment in response to questions is to adopt an adverse inference that the answer would have been against the party's interest. *E.g.*, Wis. Stat. § 905.13(4); Wis. JI Civil-425; *Grognet,* 45 Wis. 2d at 239. Plaintiffs therefore will ask the Court at the appropriate time to adopt adverse inferences against Chesebro based on his invocation of the Fifth Amendment in response to every interrogatory.

the claimant must show that: 1) he is being forced to provide documents under compulsion, 2) the act of production itself has a testimonial aspect, and 3) the testimonial aspect is incriminating. *E.g.*, *In re Grand Jury Subpoena Duces Tecum Dated Mar. 25, 2011*, 670 F.3d 1335, 1341 (11th Cir. 2012).

Citing concurring and dissenting opinions and law review articles, Chesebro advances a different view of the privilege, apparently believing it immunizes him from producing documents that might tend to incriminate him. *See* (Ex. B; Objection to Request Number One ("[T]he Fifth Amendment privilege protects against the compelled production not just of incriminating testimony, but of any incriminating evidence." (citation omitted)). That position has been expressly rejected by the Supreme Court and is not the law. *See, e.g.*, *Hubbell*, 530 U.S. at 35 (noting "settled proposition that a person may be required to produce specific documents even though they contain incriminating assertions of fact or belief"); *Fisher*, 425 U.S. at 410 (holding that a person "cannot avoid compliance with the subpoena merely by asserting that the item of evidence which he is required to produce contains incriminating writing, whether his own or that of someone else"). Under the contours of the privilege as defined by the Supreme Court of the United States, Chesebro's assertion of the privilege must be rejected.

B. Chesebro has improperly asserted the Fifth Amendment privilege categorically to refuse to produce *any* documents whatsoever in response to discovery requests.

Chesebro's cursory and categorial assertion of the Fifth Amendment privilege is insufficient to justify his refusal to comply with Wisconsin's discovery rules. "The witness is not exonerated from answering merely because he declares that in so doing he would incriminate himself—his say-so does not of itself establish the hazard of incrimination. It is for the court to say whether his silence is justified." *Hoffman v. United States*, 341 U.S. 479, 486 (1951). "The

burden is on the [party invoking the Fifth Amendment privilege] to establish" every element of the privilege. *State v. Sahs*, 2013 WI 51, ¶9 n.7, 347 Wis. 2d 641, 832 N.W.2d 80.

Chesebro has not met his burden to establish the privilege applies to *any* of these document requests, much less *all* of them. Assertions of privilege may not be made on a categorical basis or in an abstract way. A person does not have "carte blanche by virtue of the Fifth Amendment's self-incrimination clause to refuse to answer questions." *In re High Fructose Corn Syrup Antitrust Litig.*, 295 F.3d at 663. "Determining whether an act of production is both testimonial and self-incriminating requires a particularized case-by-case analysis." *In re Grand Jury Subpoena (Mr. S.)*, 662 F.3d 65, 73 (1st Cir. 2011). Thus, a claimant must assert the "Fifth Amendment privilege pertaining to specific documents and in response to individual questions upon their reasonable belief that a compulsory response by them to these testimonial matters will pose a substantial and real hazard of subjecting them to criminal liability." *United States v. Clark*, 847 F.2d 1467, 1474 (10th Cir. 1988) (quotation omitted). Chesebro's cursory and categorical assertions fail to meet his burden of establishing that the privilege was properly claimed.

C. Specific examples demonstrate the disingenuousness of Chesebro's Fifth Amendment assertions.

Chesebro's assertions of the privilege also reek of bad faith. Even if he had a basis for asserting the privilege over *some* documents, it strains credulity to believe that Chesebro could not identify even a single page responsive to any of Plaintiffs' document requests that he could turn over. His defiance here stands in contrast to his willingness to disclose documents to prosecutors and other government entities, such as the Select Committee.

For example, Request for Production Number 1 asks for all documents provided to the Select Committee. Chesebro provided nothing in response except an objection based on the Fifth Amendment. Chesebro may not claim the privilege over documents that he provided to the

Select Committee because he faces no increased risk of self-incrimination by producing them in this civil litigation. For his claim of privilege to be sustained, Chesebro must demonstrate a risk of incrimination *from disclosure to Plaintiffs* that is "real and appreciable . . . not a danger of an imaginary and unsubstantial character." *Hiibel v. Sixth Jud. Dist. Ct. of Nevada, Humboldt Cnty.*, 542 U.S. 177, 190 (2004) (citation omitted). A witness asked to provide "precisely the same" testimony as he provided in a previous case may not invoke the privilege against self-incrimination because the new testimony "would not expose [the witness] to any further jeopardy beyond that which existed by virtue of prior testimony." *United States v. Allmon*, 594 F.3d 981, 985 (8th Cir. 2010). The same logic applies squarely to Plaintiffs' request that Chesebro provide "precisely the same" documents already provided to the Select Committee.

Chesebro also may not assert a Fifth Amendment privilege for requested documents that are listed on the privilege log provided by co-Defendant James R. Troupis in response to the discovery requests Plaintiffs served to him (Exhibit G). The party invoking the Fifth Amendment's "act of production" rationale must demonstrate that providing the documents will compel incriminating testimony about the documents' existence, possession, or authenticity. Chesebro has provided nothing to meet this burden over *any* of the documents, but Troupis's privilege log eliminates any colorable Fifth Amendment argument over the documents listed. The privilege log reveals the existence of the documents, and whether Chesebro is in possession of them or not is not itself incriminating. And simply providing the documents in response to a request for production does not authenticate them. *Castro v. DeVry Univ., Inc.*, 786 F.3d 559, 578 (7th Cir. 2015) ("The mere act of producing a document in response to a discovery request based on the content of the document does not amount to an admission of the document's authenticity." (emphasis removed)). Plaintiffs can verify their authenticity with Troupis or other participants.

Thus, there is no colorable argument that the Fifth Amendment protects Chesebro from providing the documents listed on the privilege log. *See, e.g.*, *Ponds*, 454 F.3d at 320 (holding if the party seeking discovery can show with "reasonable particularity" that it knows of the existence of the documents, then producing the documents has no incriminating testimonial aspect).[6]

These specific examples highlight a few instances where Chesebro's assertion of the Fifth Amendment is improper. But it is not Plaintiffs' burden to *disprove* that the privilege applies; it is Chesebro's burden to demonstrate that it does. His spurious and sweeping claim of privilege falls well short and should be rejected.

D. Chesebro's shifting and frivolous rationales for refusing to cooperate in discovery further suggest bad faith.

Chesebro's reliance on an interpretation of the Fifth Amendment that is foreclosed by Supreme Court precedent, and his refusal to provide any documents whatsoever in response to document requests, suggest he is not engaging in good faith. But any doubt on that score is removed by Chesebro's most recent response to Plaintiffs' latest demand for these documents, which is frivolous.

[6] By not specifically asserting attorney-client privilege or work-product protection in response to Plaintiffs' requests for production of documents, Chesebro has waived any such privilege. *See* Wis. Stat. § 804.09(2)(b)(1). Moreover, the ethics rules expressly allow Chesebro to produce documents he believes are necessary to defend himself in this lawsuit. SCR 20:1.6(c)(4); *In re Disciplinary Proc. Against Thompson*, 2014 WI 25, ¶25, 353 Wis. 2d 556, 847 N.W.2d 793. In any event, even if Chesebro should attempt to assert attorney-client privilege or work-product protection at this late stage, many of the documents listed on Troupis's privilege log lack a colorable claim of privilege or work-product protection or are subject to production under the crime-fraud exception, as set forth in more detail in Plaintiffs' Brief in Support of their Motion to Compel Discovery against Troupis (Dkt. 371). Indeed, a court has already held that the crime-fraud exception prevents Chesebro's assertion of the attorney-client privilege over documents relating to the fraudulent elector scheme. *Georgia v. Kenneth John Chesebro*, Indictment No. 23SC188947 (Sup. Ct. Fulton County), Order on Deft's Mot. to Exclude Communications (Oct. 18, 2023) (available as Dkt. 373).

On January 31, after weeks of conversations seeking to negotiate the production of documents, Plaintiffs sent a letter to Chesebro, demanding, among other things, that he "immediately produce all documents that [he] turned over to the U.S. House Select Committee to Investigate the January 6 Attack on the United States Capitol." (Ex. C). This was Chesebro's obligation under Request for Production No. 1—requesting "Each document submitted by you, or on your behalf, to the Select Committee" (Ex. A)[7]—but Chesebro had simply objected on Fifth Amendment grounds (Ex. B). Plaintiffs' letter explained that because these documents had already been disclosed to the Government, there was no risk of self-incrimination from simply providing them again to Plaintiffs.

In response, Chesebro (through counsel[8]) wrote: "the documents you seek are not now and never have been in the hands of the January 6 committee, as your review of a transcript of those proceedings will confirm." (Ex. E). This newfound disavowal of any responsive documents was inconsistent with Chesebro's prior invocation of the Fifth Amendment: if no responsive documents existed, there could be nothing to withhold on the basis of the Fifth Amendment. Even more problematically, the statement is simply wrong. As Chesebro's lawyer emphasized in a statement to the Select Committee, "we have turned over to the committee a number of documents." Select Committee, Chesebro Deposition Transcript 7 (Oct. 26, 2022) (statement of Adam Kaufmann), *available at* https://www.govinfo.gov/content/pkg/GPO-J6-TRANSCRIPT-CTRL0000923618/pdf/GPO-J6-TRANSCRIPT-CTRL0000923618.pdf. Chesebro testified about

[7] The letter contains a typographical error, mistakenly referencing Requests for Production Numbers 2 and 3, which also relate to the Select Committee.

[8] Plaintiffs' understanding is that Chesebro has retained counsel for certain purposes related to this case, but that counsel will not be entering an appearance in this case on Chesebro's behalf. (Mead Aff. ¶ 8; Ex. E).

his search for and production of documents to the Committee. *Id.* at 9–11. Indeed, the Select Committee publicly posted one of the documents that Chesebro provided.[9] Chesebro's latest response to Plaintiffs' demand for records demonstrates he is not engaging in good faith.

Chesebro's latest response also raises, for the first time, a baseless argument that the Court lacks personal jurisdiction over Chesebro (Ex. E). This objection was not asserted in Chesebro's initial responses to the discovery requests. Chesebro answered Plaintiffs' complaint without filing a motion to dismiss for lack of personal jurisdiction. He also appeared on his own behalf at court proceedings (via Zoom) without raising any such objection. Moreover, the objection is frivolous. Wisconsin's long-arm statute, Wis. Stat. § 801.05, "was intended to provide for the exercise of jurisdiction over nonresident defendants to the full extent consistent with the requisites of due process of law." *Rasmussen v. Gen. Motors Corp.*, 2011 WI 52, ¶20, 335 Wis. 2d 1, 803 N.W.2d 623. Chesebro conspired with co-defendants who were all based in Wisconsin, intentionally directed his efforts at Wisconsin, and intended his actions to have an impact in Wisconsin. (Dkt. 107, Am. Compl. ¶¶90, 128–50, 163, 186–229). Indeed, Chesebro himself physically traveled to Wisconsin on December 14, 2020, to participate in the fraudulent electors' meeting. (Am. Compl. ¶132). There is no colorable argument that this Court lacks personal jurisdiction over him. *See, e.g.*, *Oxmans' Erwin Meat Co. v. Blacketer*, 86 Wis. 2d 683, 693, 273 N.W.2d 285 (1979) (finding personal jurisdiction over a party for "tortious act he committed while personally present in the state").

Chesebro's refusal to provide any documents, based on shifting and meritless rationales, is a prime example of bad faith, and should not be tolerated by the Court.

[9] Available at https://www.govinfo.gov/content/pkg/GPO-J6-DOC-CTRL0000918596/pdf/GPO-J6-DOC-CTRL0000918596.pdf

E. The Court should compel Chesebro to provide all responsive documents immediately, and consider such other sanctions as appropriate.

Chesebro's complete refusal to cooperate in document discovery has hampered Plaintiffs' ability to gather evidence and litigate this case. As the Wisconsin Supreme Court has noted, the "purpose of discovery is identical to the purpose of our trial system—the ascertainment of truth." *Sands*, 2008 WI 89, ¶19. The "invocation of [the Fifth Amendment] privilege [i]s . . . discovery noncompliance," *Link v. Link*, 2022 WI App 9, ¶5, 401 Wis. 2d 73, 972 N.W.2d 630, and interferes with Plaintiffs' "pursuit of truth and justice," *Sands*, 2008 WI 89, ¶21. The wrongful assertion of the Fifth Amendment "amount[s] to the obstruction of the administration of justice." *Grognet*, 45 Wis. 2d at 240–4.

Plaintiffs therefore ask the Court to order Chesebro to produce, immediately, all responsive documents. *See* Wis. Stat. § 804.12(1)(a). The Court should further award Plaintiffs' their attorney's fees for having to bring this motion, and such other relief that it deems appropriate. *Id.* Should Chesebro continue to refuse to comply with his obligations to produce documents, the Court should enter default judgment in Plaintiffs' favor against Chesebro. *See* Wis. Stat. § 804.12(2)(a)(3); *Grognet*, 45 Wis. 2d at 240–41 (noting a default judgment is an appropriate remedy for a wrongful refusal to answer based on the Fifth Amendment).

CONCLUSION

For the reasons set forth above, the Court should grant Plaintiffs' Motion to Compel.

Dated February 13, 2024

Respectfully submitted,

Electronically signed by Joseph W. Mead

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