

**IN THE SUPERIOR COURT OF THE STATE OF RIDGEWAY
IN AND FOR RIDGEWAY COUNTY**

WILFORDSHULMAN,
Petitioner-Plaintiff,

v.

JAMESGARDAI, in his official and
quasi-official capacities as Sergeant in the
Ridgeway National Guard,
Respondent-Defendant.

No. RSC-CV-3172

Plaintiff WilfordShulman, by and through undersigned counsel, hereby requests pursuant to Ridgeway Rule of Civil Procedure 19(A) that Defendant JamesGardai answer, in full, the following set of Request for Admissinos, in writing and under official oath—

DEFINITIONS

- A. "DEFENDANT", "YOU" and "YOUR" shall mean Defendant JamesGardai.
- B. "PLAINTIFF" shall mean Plaintiff WilfordShulman.
- C. "SUBJECT INCIDENT" means and refers to the incident on June 22, 2024, described in PLAINTIFF's Complaint upon which this suit is founded.
- D. "NEW HOPE SANCTUARY" means and refers to the religious group or assembly described in PLAINTIFF's Complaint whose members were arrested by DEFENDANT.
- E. "PALMER COUNTY HALL" means and refers to the Palmer County Hall located in Palmer, Ridgeway County, Ridgeway,
- F. "UNLAWFUL ASSEMBLY STATUTE" means and refers to § 2.14 of the Ridgeway Criminal Code described in PLAINTIFF's Complaint.

REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

- 1. Admit that YOU arrested multiple of NEW HOPE SANCTUARY's members including PLAINTIFF during the SUBJECT INCIDENT under the UNLAWFUL ASSEMBLY STATUTE.

REQUEST FOR ADMISSION NO. 2:

- 2. Admit that the arrest was made in retaliation to NEW HOPE SANCTUARY's peaceful assembly on a public sidewalk near the PALMER COUNTY HALL.

REQUEST FOR ADMISSION NO. 3:

- 3. Admit that YOU saw a group of 4 or more individuals assembling and campaigning for Matrix_oc near the PALMER COUNTY HALL.

REQUEST FOR ADMISSION NO. 4:

4. Admit that YOU did not arrest this group under the UNLAWFUL ASSEMBLY STATUTE despite the fact that they did not have a “valid permit” as required thereby.

REQUEST FOR ADMISSION NO. 5:

5. Admit that YOU selectively enforced the UNLAWFUL ASSEMBLY STATUTE against NEW HOPE SANCTUARY’s members.

REQUEST FOR ADMISSION NO. 6:

6. Admit that YOUR arrest of PLAINTIFF lacked probable cause.

REQUEST FOR ADMISSION NO. 7:

7. Admit that YOUR arrest of NEW HOPE SANCTUARY’s members lacked probable cause.

REQUEST FOR ADMISSION NO. 8:

8. Admit that, before arresting NEW HOPE SANCTUARY’s members, YOU had an argument with a member of NEW HOPE SANCTUARY.

REQUEST FOR ADMISSION NO. 9:

9. Admit that, during this argument, this member said “u cant do nothing lil bro”

REQUEST FOR ADMISSION NO. 10:

10. Admit that, immediately after this member made that comment, YOU threatened with arrest, and afterwards arrested, NEW HOPE SANCTUARY’s members including Plaintiff.

REQUEST FOR ADMISSION NO. 11:

11. Admit that, despite claiming YOU arrested NEW HOPE SANCTUARY for violating the UNLAWFUL ASSEMBLY STATUTE by assembling without a “valid permit,” YOU knowingly failed to enforce the UNLAWFUL ASSEMBLY STATUTE against another group of 4 or more individuals assembling without a “valid permit.”

REQUEST FOR ADMISSION NO. 12:

12. Admit that YOU were in a state of anger during the SUBJECT INCIDENT as a result of the statement made by a member of NEW HOPE SANCTUARY.

REQUEST FOR ADMISSION NO. 13:

13. Admit that YOUR arrests of NEW HOPE SANCTUARY’s members during the SUBJECT INCIDENT were caused by YOUR anger.

DATED: JULY 22, 2024
Palmer County Hall

CENTER FOR INDIVIDUAL RIGHTS

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