

**IN THE CLAIMS COMMISSION OF THE STATE OF TENNESSEE**

<b>JAMES F. KENTON,</b>	)	
	)	
<i>Claimant,</i>	)	
	)	
-vs-	)	<b>Claim No. 0546-GL-03000338-001</b>
	)	
	)	
<b>STATE OF TENNESSEE,</b>	)	
	)	
<i>Defendant.</i>	)	

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**CLAIMANT’S REQUESTS FOR ADMISSION  
PROPOUNDED ON THE STATE OF TENNESSEE**

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TO: **STATE OF TENNESSEE**  
*c/o Hollie Parrish  
and Andrew Womack  
Attorney General’s Office  
P.O. Box 20207  
Nashville, TN. 37202*

Pursuant to Rules 26 and 36 of the Tennessee Rules of Civil Procedure, Claimant James P. Kenton hereby propounds his First Set of Requests for Admission to Defendant to be answered within 30 days of service as required by the Tennessee Rules of Civil Procedure. Mr. Burke reserves the right to propound additional requests for admission as discovery progresses.

These Requests are continuing in nature and require Defendant to file supplemental responses, in accordance with Rule 26 of the Tennessee Rules of Civil Procedure as soon as Defendant obtains further and different information after initial responses have been given. Any and all supplemental responses shall include the date

upon which and the manner in which such further or different information came to Defendant's attention.

### **INSTRUCTIONS**

The following Instructions shall apply to these Requests in addition to the obligations set forth in the Tennessee Rules of Civil Procedure.

1. You are requested to admit the following based on all information in Your possession and all information available to You, not merely such information as You know of Your own personal knowledge, but also all information that is available to You, Your representatives, agents and attorneys, to the extent not privileged, including inquiry of their representatives.

2. If You object to furnishing any of the information requested by these Requests on the grounds of attorney-client privilege, work product, or other privilege, or otherwise, then, with respect to each such Request:

- a. state the nature of the privilege claimed;
- b. state the date of each communication supporting the privilege claim;
- c. state the location, if any, of such supporting communication;
- d. identify by name, address, employment, position and title all participants in the supporting communication;
- e. state the specific grounds on which Your objection is based;
- f. identify the specific request calling for such information;
- g. identify each other document not requested but upon which You rely for Your claim of privilege; and

h. provide a general description as to the nature, rather than the substance, of the purportedly objectionable information.

3. These Requests shall be deemed to seek information as of the date of Your responses and shall be deemed to be continuing in nature so that any additional information relating in any way to these Requests that You acquire or that becomes known to You up to and including the time of a trial or hearing in this matter shall be furnished to Defendant promptly after the information is acquired or becomes known to You.

4. If You cannot fully answer a particular Request, after exercising due diligence to make inquiry and to secure the necessary information, state the answer to the extent possible, specifying Your inability to answer the remainder and stating whatever information or knowledge You have concerning the unanswered portion.

5. If You object to any of the Requests on the grounds that it is vague and/or ambiguous, please state:

a. The portion(s) of or terms in the Request that You claim to be vague and/or ambiguous; and

b. The interpretation of the Request pursuant to which You provide a response.

### **DEFINITIONS**

1. “Any,” “and” and “or” shall be construed either conjunctively or disjunctively as necessary to bring within the scope of the discovery request all responses which might otherwise be construed to be outside its scope.

2. “Each,” “every,” “all,” and “any” include the meaning of every other word.

3. “Person” or “persons” means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments, and other units thereof, and shall include, but not be limited to, a public or private corporation, partnership, joint venture, voluntary or unincorporated association, organization, proprietorship, trust, estate, governmental agency, commission, bureau or department.

4. “Relating,” “relates,” or “related” means and includes referring to, concerning, referencing, mentioning, associated with, constituting, discussing, containing, embodying, recording, reflecting, identifying, summarizing, incorporating and/or dealing with or pertaining to in any way.

### **REQUESTS FOR ADMISSION**

1. Admit that William Decker Thorowogood spoke with Debora Larson about the Claimant.

RESPONSE:

2. Admit that William Decker Thorowogood spoke with Michelle Prescott about the Claimant.

RESPONSE:

3. Admit that William Decker Thorowogood spoke with Mary Ellen Kenton about the Claimant.

RESPONSE:

4. Admit that William Decker Thorowogood spoke with Marcus Scott about the Claimant.

RESPONSE:

5. Admit that William Decker Thorowogood spoke with Leslie Nolan about the Claimant.

RESPONSE:

6. Admit that William Decker Thorowogood spoke with Carol MacCollum about the Claimant.

RESPONSE:

7. Admit the Affidavit for the Warrant contained at least one false statement of fact.

RESPONSE:

8. Admit that the Warrant was not signed by a judge.

RESPONSE:

9. Admit that at the time the Warrant was issued, Tennessee Metal Roofing Company was not an existing corporate entity in the State of Tennessee.

RESPONSE:

10. Admit that the Warrant listed William Decker Thorowogood as the "Prosecutor."

RESPONSE:

11. Admit that William Decker Thorowgood is not a prosecutor.

RESPONSE:

12. Admit that William Decker Thorowgood is not a licensed attorney in the state of Tennessee.

RESPONSE:

13. Admit that the Charge(s) against the Claimant were based upon a defective Warrant issued by William Decker Thorowgood.

RESPONSE:

14. Admit that the Claimant was arrested without a properly signed or “sworn and subscribed” Warrant.

RESPONSE:

15. Admit that the Warrant fails to comply with Rule 4 of the Tennessee Rules of Criminal Procedure.

RESPONSE:

16. Admit that the Claimant was arrested in his home without a properly executed arrest warrant by the Mount Juliet Police.

RESPONSE:

17. Admit that if the Warrant was signed, it was done after the arrest and detention of the Claimant.

RESPONSE:

18. Admit that the Claimant was imprisoned for approximately two hours in the Wilson County jail.

RESPONSE:

19. Admit that the Claimant was transferred from the Wilson County jail to the Davidson County jail where he was held for an additional ten hours.

RESPONSE:

20. Admit that Mike Haskin was arrested based upon an unsigned warrant that listed William Decker Thorowgood as the Prosecutor.

RESPONSE:

21. Admit that Mike Haskin died shortly after he was arrested.

RESPONSE:

22. Admit that the Claimant was not the owner of Tennessee Metal Roofing Company.

RESPONSE:

23. Admit that Roger J. Stephens never met the Claimant.

RESPONSE:

24. Admit that Roger J. Stephens never spoke to the Claimant.

RESPONSE:

25. Admit that Roger J. Stephens failed to rescind the contract within the proper time period.

RESPONSE:

26. Admit that Mike Haskins met with Roger J. Stephens regarding a quote for roof replacement.

RESPONSE:

27. Admit that Mike Haskins gave Roger J. Stephens an initial quote for roof replacement for a total cost of \$11,990.00.

RESPONSE:

28. Admit that Mike Haskins requested a ten percent (10%) down payment from Roger J. Stephens.

RESPONSE:

29. Admit that Mike Haskins conducted a second roof inspection for Roger J. Stephens.

RESPONSE:

30. Admit that after Mike Haskins conducted a second roof inspection for Roger J. Stephens, he told Mr. Stephens that the chimney “showed rot” and stated that the original contract was no longer valid.

RESPONSE:

31. Admit that Mike Haskins told Roger J. Stephens that a new roof was going to be significantly more costly after the second roof inspection.

RESPONSE:



32. Admit that a subpoena was issued for Roger J. Stephens.

RESPONSE:

33. Admit that Roger J. Stephens never produced any documents responsive to the subpoena.

RESPONSE:

34. Admit that Chadwick Jackson attempted to quash the subpoena sent to Roger J. Stephens.

RESPONSE:

35. Admit that Chadwick Jackson represented Roger J. Stephens during the hearing on the Motion for Contempt.

RESPONSE:

36. Admit that the Charge against the Claimant was dismissed on August 21, 2021.

RESPONSE:

37. Admit that William Decker Thorowgood filed a Seizure Warrant in the Wilson County Register of Deeds; that included a legal description of real property that was owned by a limited liability company and not owned by the Claimant individually.

RESPONSE:

38. Admit that Chadwick Jackson authorized the filing of the Seizure Warrant.

RESPONSE:

39. Admit that on December 30, 2020, Wilson County Criminal Court Judge Brody Kane signed an order releasing and abandoning any encumbrance created by the Order issued in the Seizure Warrant.

RESPONSE:

40. Admit that Jason L. Lawson, Deputy District Attorney General recommended the entry of the Order issued in the Seizure Warrant.

RESPONSE:

41. Admit that William Decker Thorowgood was in charge of the investigation of the Claimant.

RESPONSE:

42. Admit that William Decker Thorowgood was working with the Prosecutors office to investigate and prosecute the Claimant.

RESPONSE:

43. Admit that William Decker Thorowgood spoke with the news media about the Claimant and the criminal case against the Claimant.

RESPONSE:

44. Admit that William Decker Thorowgood served the Seizure Warrant on the Claimant in front of WSMV News television cameras.

RESPONSE:

45. Admit that Chadwick Jackson violated Rule 3.8 of the Tennessee Rules of Professional Conduct during the prosecution of the Claimant.

RESPONSE:

46. Admit that after the Prosecutor became aware of the the Complaint filed by the Claimant, the Prosecutor began pursuing new criminal charges and indictments against the Claimants in retaliation.

RESPONSE:

47. Admit that, with respect to the newly filed charges against the Claimant, the Claimant voluntarily turned himself in to the Metro Nashville Police Department.

RESPONSE:

48. Admit that the Prosecutor set the Claimant's bail at \$75,000.00

RESPONSE:

49. Admit that the \$75,000 bail was done in retaliation of the Claimant filing this Complaint.

RESPONSE:

50. Admit that the Claimant sat in jail for eight (8) days.

RESPONSE:

51. Admit that Lynn Humphreys received all materials necessary for the project in a timely manner.

RESPONSE:

52. Admit that Lynn Humphry failed to rescind the contract in a timely manner.

RESPONSE:

53. Admit that William Decker Thorowgood drafted refund letters for Lynn Humphreys and Claude Eddie Sandford.

RESPONSE:

STATE OF TENNESSEE )  
COUNTY OF DAVIDSON )

\_\_\_\_\_

**STATE OF TENNESSEE )**  
**COUNTY OF WILLIAMSON )**

Personally appeared before me, \_\_\_\_\_, a notary public in and for said County and State, the above-signed, \_\_\_\_\_, and did make oath that the information contained in the foregoing document was true and correct to the best of his information, knowledge and belief.

Sworn to and subscribed before me this \_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_

Respectfully submitted,

**CRAIN LAW GROUP, PLLC**

Larry L. Crain, Tenn.Sup. Crt. # 9040  
5214 Maryland Way, Suite 402  
Brentwood, TN 37027  
(615) 376-2600  
[larry@crainlaw.legal](mailto:larry@crainlaw.legal)

*Attorney for the Respondent*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the \_\_\_\_ day of \_\_\_\_\_, 2023, a true and exact copy of the foregoing document has been served upon the person(s) listed below:

Hollie Parrish  
and Andrew Womack  
Attorney General's Office  
P.O. Box 20207  
Nashville, TN. 37202

By the method(s) identified as follows:

- U.S. Mail, Postage Prepaid
- Hand-Delivery
- Overnight Delivery Service
- Certified Mail, Return  Receipt Requested
- Facsimile

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James P. Kenton

IN THE CLAIMS COMMISSION OF THE STATE OF TENNESSEE

JAMES F. KENTON,

*Claimant,*

-vs-

STATE OF TENNESSEE,

*Defendant.*

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Claim No. 0546-GL-03000338-001

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CLAIMANT'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO THE STATE OF TENNESSEE

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TO: STATE OF TENNESSEE  
c/o Hollie Parrish  
and Andrew Womack  
Attorney General's Office  
P.O. Box 20207  
Nashville, TN. 37202

**I.  
Introduction**

Pursuant to Rules 33 and 34 Tenn. R. Civ. P., the Claimant JAMES F. KENTON, requests that the Defendant STATE OF TENNESSEE, answer in writing and under oath the following Interrogatories and produce the documents set forth below for inspection and copying by Claimant's counsel. The Defendant is requested to respond within thirty days. Claimant requests that the documents be produced for inspection and

copying at the offices of its counsel, Larry L. Crain, Esq., 5214 Maryland Way, Suite 402, Brentwood, TN 37027, or at such other reasonable and convenient location as may be mutually agreed upon.

#### INSTRUCTIONS

1. In producing documents and other materials, you are requested to furnish all documents or things in your possession, custody or control, regardless of whether such documents or materials are processed directly by you or your directors, officers, agents, partners, employees, representatives, subsidiaries, managing agents, affiliates, investigators or by your attorneys or their agents, employees, representatives or investigators.
2. If any requested document or thing cannot be produced in full, produce it to the extent possible, indicating what document or portion of that document is being withheld and the reason that document is being withheld.
3. In producing documents, you are requested to produce the original of each document requested together with all non-identical copies and drafts of that document. If the original of any document cannot be located, a copy shall be produced in lieu thereof, and shall be legible and bound or stapled in the same manner as the original.



4. All documents shall be produced in the same order as they are kept or maintained by you. Documents attached to each other should not be separated.
5. All documents shall be produced in the file, folder, envelope or other container in which the documents are kept or maintained by you. If, for any reason, the container cannot be produced, please produce copies of all labels or other identifying markings.
6. A request for each document "mentioning, discussing or referring to" a subject matter extends to each document that constitutes, contains, supports, modifies, contradicts, criticizes, concerns, describes, records, reports, reflects, relates to, was prepared in connection with, arises from, or is or has been collected, recorded, by a present or former agent, representative, officer, employee, partner, attorney, board, committee or subcommittee, or any other person acting or purporting to act on your behalf in relation to the subject matter specified.
7. Documents should be produced in such fashion as to identify the department, branch, or office of any other person in whose possession it was located, and where applicable, the natural person in whose possession it was found, and the business address of each document's custodian(s).

8. Documents not otherwise responsive to this First Discovery Request shall be produced if such documents mention, discuss or refer to, or explain the documents which are called for by this Discovery Request or if such documents are attached to documents called for by this Discovery Request and constitute deposit slips, transmittal memoranda, letters, comments, evaluations, or similar materials.

9. If a document once existed and has subsequently been lost, destroyed, or is otherwise missing, please provide sufficient information to identify the document and state the details concerning its loss.

10. If you claim the attorney-client privilege or any other privilege or work product protection for any document, that document need not be produced, but you shall with respect to that document:

- (a) state the date of the document;
- (b) identify each and every other person who prepared or participated in the preparation of the document;
- (c) identify each and every person who prepared or participated in the preparation of the document;
- (d) identify each and every person who received the document;
- (e) identify each and every person from whom the document and all copies thereof;

(f) state the present location of the document and all copies thereof;

(g) identify each and every person having custody or control of the document and all copies thereof; and

(h) provide sufficient further information concerning the document and the circumstances thereof to explain the claim of privilege or protection and to permit the adjudication of the propriety of the claims.

11. In producing documents and other materials responsive to these requests, identify by paragraph and subparagraph the request to which each produced document is responsive. If a document is responsive to more than one request, such request to which it is responsive should be identified.

12. If you do not have accurate information with respect to any interrogatory, please so state and give your best estimate as to the matter inquired about and identify each person you believe may have accurate information with respect thereto.

13. Restate each interrogatory in full prior to your response.

14. If any information required by these Interrogatories or Requests for Production is considered to be confidential or protected information, please furnish this information subject to a stipulation for the protection of confidentiality.

15. Each page of a produced document shall have a legible, unique page identifier (“Bates Number”) and confidentiality legend (where applicable) on the face of the image at a location that does not obliterate, conceal, or interfere with any information from the source document. Redactions should be clearly marked or stamped on the page in such a way that it is clear from review that a portion of the image has been redacted.

16. These requests are continuing in nature, so that if responsive information or documents come to your attention after your response, your answers should be supplemented appropriately in accordance with Rule 26.05 of the Tennessee Rules of Civil Procedure.

#### DEFINITIONS

A. **“You”** as used in these Interrogatories refers to State of Tennessee, any or agent or employee of the State of Tennessee.

B. **“Document”** as used herein in its customary broad sense, and includes, without limitation, any kind or printed, recorded, written, graphic, or photographic matter (including tape recordings and computer input or output), whether in electronic, print, audio or video format, and things similar to any of the foregoing regardless of their author or origin.

C. **“Identify”** or **“Identity”** means:

(a) When used in reference to a natural person, his full name and present or last known address and telephone number, his present or last known business or governmental position of affiliation, and his position and employers for the time period covered by these requests.

(b) When use in reference to a corporation, its name, state and date of incorporation, the address or its principal place of business, officers and directors, and the position(s) held by each officer.

(c) When used in reference to a non-corporate business entity, the nature of the legal entity (e.g., partnership, joint venture, proprietorship, etc.) pursuant to which it does business, the date and place where business commenced, the address of its principal place of business, and the identity of each person holding an ownership interest in the entity.

(d) When used in reference to a document, the date, author, author's address, type of document (e.g., letter, memorandum, telegram, chart, computer input or output, photograph, etc.) and its last known custodian(s) and location together with an identification of the file from which it came and the custodian of the file.

## **INTERROGATORIES**

1. Please identify the individual(s) who furnished information used in response to these interrogatories.

RESPONSE:

2. Please identify each person with the State of Tennessee with whom the State has discussed any of the allegations in the Amended Petition.

RESPONSE:

3. With regard to each individual identified in the State's response to the preceding interrogatory, please state the date(s) of any communications and whether you maintained any written memorialization of the communication.

RESPONSE:

4. Please identify each person who participated in the investigation, arrest, imprisonment, and/or prosecution of the Claimant; as well as the dismissal of the charges against the Claimant.

RESPONSE:

5. Please identify any individual who is known or believed to have information in this matter. For each person identified, please state their full name, mailing address, telephone number and provide a detailed summary of their knowledge.

RESPONSE:

6. Please identify any individual(s) who have knowledge of the alleged crime committed by the Claimant. For each person identified, please state their full name, mailing address, telephone number and provide a detailed summary of their knowledge.

RESPONSE:

7. Please identify each person known to have any photographs, videos or depictions of the Claimant that were created or generated in connection with the criminal action against the Claimant and this action.

RESPONSE:

8. Please identify each person known to have been interviewed by the Prosecutor's office, Chadwick Johnson, William Decker Thorowgood, or

any other investigator for the alleged crime(s) committed by the Claimant. In your answer please also state that individual(s) findings.

RESPONSE:

9. Please describe how the arrest warrant was issued against the Claimant. In your answer, please describe if the arrest warrant was issued correctly, and if it was not issued correctly, please describe how the arrest warrant was done in error.

RESPONSE:

10. Please describe the protocols that were or were not followed during the detention of the Claimant.

RESPONSE:

11. Please state the protocols for transferring the Claimant from the Wilson County jail to the Davidson County jail. In your answer please state whether proper protocols were followed or not; and if any protocols were not followed please describe the failure.

RESPONSE:



12. Please describe the investigation any Prosecutor or investigator conducted regarding the entity known as Tennessee Metal Roofing, Inc. In your answer please identify all person(s) who conducted the investigation; the findings of such investigation; and who was determined to be the owner and operator of Tennessee Metal Roofing, Inc. and the name of such individual.

RESPONSE:

13. Please describe the investigation any Prosecutor or investigator regarding the entity known as Tennessee Metal Roofing Company. In your answer please identify all person(s) who conducted the investigation, the findings of the investigation, and who was determined to be the owner and operator of Tennessee Metal Roofing Company and the name of such individual.

RESPONSE:

14. Please describe the difference between Tennessee Metal Roofing, Inc. and Tennessee Metal Company.

RESPONSE:

15. Please state each and every fact on which the State relied upon to make the determination that the Claimant was the owner of Tennessee Metal Company.

RESPONSE:

16. Please describe the investigation the State made regarding Harold Platt. In your answer please identify all persons, agencies, or entities that participated in the investigation of Harold Platt.

RESPONSE:

17. Please summarize the findings the State made regarding Harold Platt.

RESPONSE:

18. Please summarize the findings the State made regarding the existence of Tennessee Metal Roofing Company, and Tennessee Metal Roofing Company's owner and operator.

RESPONSE:

19. Please describe Roger J. Stephens' role in the claims made against the Claimant. In your answer please state whether Roger J. Stephens ever met with or spoke to the Claimant.

RESPONSE:

20. Please describe Lynn Humphrey's role in the claims made against the Claimant. In your answer please state whether Lynn Humphrey's had any dealings, meetings or conversations with William Decker Thorowgood.

RESPONSE:

21. Please describe Mike Haskins' role in the claims made against the Claimant. In your answer please state whether Mike Haskins had any dealings, meeting or conversations with Roger J. Stephens.

RESPONSE:

22. Please describe the details of the subpoena issued to Roger J. Stephens. In your answer please describe the nature of the subpoena, the documents collected due to the subpoena, or any information gained from the subpoena.

RESPONSE:

23. Please explain or describe the contract between Roger J. Stephens and Mike Haskins. In your answer please state the parties role, the amount owed under the contract, the work to be done under the contract, and any deadlines under the contract.

REPNONSE:

24. Please explain whether any Motion for Contempt was filed against Roger J. Stephens, and if so, when was that Motion filed; what was the disposition of that Motion; who represented Roger J. Stephens; and if any documentation was turned over to the Claimant per that Motion.

RESPONSE:

25. Please describe the circumstances surrounding the Prosecutor dismissing the charges against the Claimant. In your answer please identify all person(s) who contributed to the decision to dismiss the charges.

RESPONSE:

26. Please describe the circumstances surrounding the approval of the expungement of the charges against the Claimant. In your answer please describe the charges and alleged crime expunged for the Claimant; as well as the individuals involved in the decision to expunge the charges.

RESPONSE:

27. Please explain the circumstances surrounding the Seizure Warrant issued against the Claimant. In your answer please identify all person(s), agencies or entities that participated in the issuing of the Seizure Warrant against the Claimant.

RESPONSE:

28. Please explain what happened on December 30, 2020, in the Wilson County Criminal Court and what Judge Brody Kane did regarding the Seizure Warrant. In your answer please identify all person(s), agencies or entities that were involved that day; what the order of the court was on that day; and why the State made any recommendation if any that day.

RESPONSE:

29. Please describe any failures made by the Prosecutor; or any non-compliance of the Tennessee Rules of Professional Conduct made by the Prosecutor involved in the case(s) against the Claimant. In your answer please cite to the rule(s) not followed by the Prosecutor or any policies or protocols not followed.

RESPONSE:

30. Please describe and list any information or evidence the State possessed or is still in possession of that was obtained prior to the arrest of the Claimant.

RESPONSE:

31. Please describe or list any information or evidence the State possessed or is still in possession of that was obtained prior to the dismissal of the Charges against the Claimant.

RESPONSE:

32. Please describe or list any information or evidence the State possessed or is still in possession of that would mitigate the offense(s) or charge(s) against the Claimant.

REPOINSE:

33. Please give William Decker Thorwgood's title, employer and description of his job duties.

RESPONSE:

34. Please give Chadwick Jackson's title, employer and description of job duties.

RESPONSE:

35. Please describe all communications, conversations, emails, letters, tweets, social media posts, between the state and any News outlets. In your answer please give the name of the news contact, the nature of the

communications, the information communicated, and state whether such communication was proper per ethical standards, rule(s) or protocol(s).

RESPONSE:

36. Please describe or explain how the Prosecutor did or did not comply with the Rules 3.6 & 3.8(f) of the Tennessee Rules of Professional Conduct in the case(s) pertaining to the Claimant. In your answer please state whether the Prosecutor in the case encouraged or discouraged investigators, law enforcement personnel, or any other person(s) assisting or associated with the Prosecutor in this matter from making any statements that would be prohibited under Rule 3.6 or 3.8 of the Tennessee Rules of Professional Conduct.

RESPONSE:

37. Please describe if there has been any retaliation on behalf of the State by Chadwick Jackson against the Claimant since the commencement of this



Complaint against the State of Tennessee. In your answer please describe any new or recent charges filed against the Claimant since the time of filing this Petition; any Grand Jury Indictment(s); or any other sort of legal action against the Claimant by any State or local actors.

RESPONSE:

38. Please describe the details behind the Grand Jury Indictment resulting in a True Bill on April 28, 2022 against the Claimant. In your answer please describe the factual basis that Claimant's bail was set at \$75,000.00 and whether this bail and indictment were retaliation.

RESPONSE:

39. Please describe all communications between any state Prosecutor(s), William Decker Thorowgood, and/or Roger J. Stephens relating to the Grand Jury Indictment of the Claimant. In your description of these communications, please state the time, place and manner of the communication(s), as well as the content of such communications.

RESPONSE:

40. Please describe in detail the factual basis for all allegations made against the Claimant in all criminal court cases filed against him.

RESPONSE:

41. Please describe Claude Eddie Sandford's role in the claims made against the Claimant. In your answer please state whether Claude Eddie Sandford had any dealings, meetings or communications with William Decker Thorowgood.

RESPONSE:

42. Please describe Debora Larson's role in the claims made against the Claimant. In your answer please state whether Debora Larson had any dealings, meetings or communications with William Decker Thorowgood.

RESPONSE:

43. Please describe Michelle Prescott's role in the claims made against the Claimant. In your answer please state whether Michelle Prescott had any dealings, meetings or communications with William Decker Thorowgood.

RESPONSE:

44. Please describe Marcus Scott's role in the claims made against the Claimant. In your answer please state whether Marcus Scott had any dealings, meetings or communications with William Decker Thorowgood.

RESPONSE:

45. Please describe Leslie Nolan's role in the claims made against the Claimant. In your answer please state whether Leslie Nolan had any dealings, meetings or communications with William Decker Thorowgood.

RESPONSE:

46. Please describe Carol MacCollum's role in the claims made against the Claimant. In your answer please state whether Carol MacCollum had any dealings, meetings or communications with William Decker Thorowgood.

RESPONSE:

STATE OF TENNESSEE     )  
COUNTY OF DAVIDSON    )

\_\_\_\_\_

**STATE OF TENNESSEE     )**  
**COUNTY OF WILLIAMSON    )**

Personally appeared before me, \_\_\_\_\_, a notary public in and for said County and State, the above-signed, \_\_\_\_\_, and did make oath that the information contained in the foregoing document was true and correct to the best of his information, knowledge and belief.

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_

### **DOCUMENTS REQUESTED**

1. Please provide a copy of all documents or evidence identified in, referred to, supports, and/or pertains to your answers to the preceding Interrogatories.

RESPONSE:

2. Please provide a copy of any photograph, video or visual depiction of any physical evidence that the State utilized in their criminal charge(s) and/or indictment(s) against the Claimant.

RESPONSE:

3. Please provide all emails or correspondence between the State, the Prosecutor, or any law enforcement agent, and Debora Larson, Michelle Prescott, Mary Ellen Kenton, Marcus Scott, Leslie Nolan, Lynn Humphreys and Carol MacCollum.

RESPONSE:

4. Please provide all documentation obtained from Debora Larson, Michelle Prescott, Mary Ellen Kenton, Marcus Scott, Leslie Nolan, Lynn Humphreys and Carol MacCollum, that was used in the case(s) against the Claimant.

RESPONSE:

5. Please provide any emails or correspondence between the Prosecutor and William Decker Thorowgood that mentions, pertains or discusses the Claimant and any charges against the Claimant.

RESPONSE:

6. Please provide any emails or correspondence between the Prosecutor and Roger J. Stephens that mentions, pertains or discusses the Claimant and any charges against the Claimant.

RESPONSE:

7. Please provide a copy of any document on which the State relied or which the State consulted in preparing the State's responses to the foregoing interrogatories.

RESPONSE:

8. Please provide a copy of any emails or correspondence between the State and any investigator, agent or officer which mention or refer to the Claimant.

RESPONSE:

9. Please provide a copy of any documents that the State provided to any member, agent or officer which mention or refer to the Claimant.

RESPONSE:

10. Please provide any emails or correspondence between the Prosecutor and any news outlet that mentions, pertains or discusses the Claimant and any charges against the Claimant.

RESPONSE:

11. Please provide a copy of any documents or correspondence exchanged between the State and Jennifer Kraus which mention or refer to the Claimant.

RESPONSE:

12. Please provide a copy of any documents that any officer or investigator with the Metro Nashville Police Department has provided to the State which mention or refer to the Claimant.

RESPONSE:

13. Please provide all copies of any Warrant's that name the Claimant.

RESPONSE:



14. Please provide a copy of any documents that any officer or investigator with the Mount Juliet Police Department has provided to the State which mention or refer to the Claimant.

RESPONSE:

15. Please provide all documents that pertain to the arrest of Mike Haskin, including the arrest warrant(s).

RESPONSE:

16. Please provide all documents that were obtained during the investigation and utilized in the charging of the Claimant that have the name Tennessee Metal Roofing, Inc. anywhere within the document.

RESPONSE:

17. Please provide all documents that were obtained during the investigation and utilized in the charging of the Claimant that have the name Tennessee Metal Roofing Company anywhere within the document.

RESPONSE:

18. Please provide all documents pertaining to the investigation of, and/or naming Harold Platt.

RESPONSE:

19. Please provide a copy of all documents received by the Prosecutor from Joe Calvert.

RESPONSE:

20. Please provide a copy of any document, photograph, video, memorandum or other data compilation which the State contends supports the State's claim that Claimant committed a crime(s).

RESPONSE:

21. Please provide all documents that either came from or have the name Mike Haskins on it.

RESPONSE:

22. Please provide all documents that either came from or have the name Roger J. Stephens on it.

RESPONSE:

23. Please provide all documents that pertain to the Seizure Warrant against the Claimant.

RESPONSE:

24. Please provide all documents and communications from or to Jason L. Lawson that pertain to the Claimant.

RESPONSE:

25. Please provide all documents and communications regarding any punishment(s), reprimand(s), violation(s) of policy(s), or malfeasance by any Prosecutor(s) handling any and all cases against the Claimant.

RESPONSE:

26. Please provide all communications or documents from Claude Eddie Sandford relating to the Claimant.

RESPONSE:

27. Please provide all documentation or evidence that formed the basis of each count of the Grand Jury Indictment against the Claimant.

RESPONSE:

28. Please provide copies of all letters drafted by William Decker Thorowgood on behalf of Lynn Humphreys and Claude Eddie Sandford.

RESPONSE:

Respectfully submitted,

**CRAIN LAW GROUP, PLLC**

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*Attorney for the Respondent*



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the \_\_\_\_ day of \_\_\_\_\_, 2023, a true and exact copy of the foregoing document has been served upon the person(s) listed below:

Hollie Parrish  
and Andrew Womack  
Attorney General's Office  
P.O. Box 20207  
Nashville, TN. 37202

By the method(s) identified as follows:

U.S. Mail, Postage Prepaid  
Hand-Delivery  
Overnight Delivery Service  
Certified Mail, Return Receipt Requested  
Facsimile

\_\_\_\_\_  
Larry L. Crain