

VIRGINIA:

IN THE CIRCUIT COURT OF THE COUNTY OF FAIRFAX

_____)	
WORLD MISSION SOCIETY, CHURCH)	
OF GOD A NJ NONPROFIT)	
CORPORATION,)	
)	
Plaintiff,)	CASE NO.: 2011-17163
)	
vs.)	
)	
MICHELE COLON and)	
TYLER J. NEWTON)	
)	
Defendants.)	
_____)	

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
PROPOUNDED TO DEFENDANT TYLER J. NEWTON**

COMES NOW Plaintiff, World Mission Society, Church of God a NJ Nonprofit Corporation ("Plaintiff"), by counsel Dozier Internet Law, P.C., and pursuant to Rule 4:8 of the Rules of the Supreme Court of Virginia, submits this Plaintiff's First Set of Interrogatories Propounded to Defendant Tyler J. Newton for responses within twenty-one (21) days as required by the Rules of the Virginia Supreme Court:

DEFINITIONS AND INSTRUCTIONS

1. In answering these Interrogatories, you are required to furnish such information as is available to you, however obtained, including hearsay and information known by, or in the possession of, you or your agents, including every attorney representing you. If any Interrogatory cannot be answered in full after exercising due diligence to secure the information, answer to the extent possible, specifying your inability to answer the remainder, stating whatever

information and knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

2. Your answers to these Interrogatories must be supplemented, as necessary, in accordance with the Rules of the Supreme Court of Virginia.

3. The pronouns “you” and “your” refer to the parties to whom these Interrogatories are addressed, their related entities, and any representatives, agents, servants, employees and others acting on their behalves.

4. The term “document” or “documents” shall mean, without limitation, the original and any and all drafts and non-identical copies of any writings of any kind in your possession, custody or control, including, but not limited to, correspondence, electronic mail, electronic mail attachments, web pages, scripts, records, reports, external and internal memoranda, digital voice exchange transcripts or summaries, notes, letters, telegrams, telexes, messages (including, but not limited to, reports of telephone conversations, messages and conferences), studies, analyses, books, magazines, newspapers, booklets, circulars, bulletins, instructions, minutes, other communications, questionnaires, surveys, contracts, memoranda of agreement, assignments, books of account, orders, records of summaries of personal interviews or conversations, diaries, schedules, printouts, drawings, blueprints, specifications, graphs, charts, studies, planning materials, statistical statements, forecasts, work papers, invoices, statements, receipts, income and other tax returns, bills, checks, bank books, bank statements, vouchers, notebooks, data sheets, photographs, microfilm, microfiche, photographic negatives, tapes, magnetic tapes, paper tapes, cassette tapes, videotapes, plotter output recordings, discs, data cards, films, data processing files, and other computer readable records or programs, breadboards, catalogues, brochures, all other written or printed matter of any kind, and all other data compilation from

which information can be obtained and translated if necessary. Any such document bearing on any page, thereof, any marks such as initials, stamped indices, comments or notations of any character and not part of the signed text or photographic reproduction thereof is to be considered and produced as a separate document.

5. The term “identify,” “identification,” or “identity” used in reference to:

a. A natural person, shall mean to state the person’s full legal name, present or last known residential address and phone number, present or last known occupation or business affiliation, name, address and phone number of present or last known employer, and each of his/her business titles during the applicable time period;

b. A company, corporation, association, partnership or other business or legal entity shall mean to state its full legal name, the name under which it does business, the address of its principal place of business and the type of entity it is (e.g., corporation, partnership, etc.).

6. The term “communication” shall mean any oral or written statement, any conversation, and any other transmission of information.

7. Unless otherwise specified, when construing the scope of these Interrogatories, the terms shall be given their most expansive and inclusive interpretations, including but not limited to:

a. Construing the words “and” and “or” in the conjunctive or disjunctive as necessary to make the Interrogatory more inclusive;

b. Construing the words “any” and “all” to mean “any and all” as necessary to make the Interrogatory more inclusive;

c. Construing the past or present tenses of a verb to mean the present or past tenses of the verb, respectively, as necessary to make the Interrogatory more inclusive;

d. Wherever any term is used in the singular, it should be construed to include the plural, and *vice versa*, in order that the scope of these Interrogatories shall encompass the broadest range of discoverable information possible.

e. Wherever any gender is indicated by any term in these Interrogatories it should be construed to include the opposite gender or neuter in order that the scope of these Interrogatories shall encompass the broadest range of discoverable information possible.

8. Unless otherwise indicated, these Interrogatories are referring to the time, place, and circumstances of the occurrence mentioned or complained of in the pleadings.

9. Where knowledge or information in the possession, custody or control of a party is requested, such Interrogatory requires disclosure of knowledge in possession of the party's agents, servants, employees, representatives and any other person acting on his or her behalf, including, unless privileged, its attorneys.

10. Each response to an Interrogatory is to be set forth separately. Responses should not be combined for the purpose of supplying a common answer thereto, but responses may be supplied by reference to the response to another Request.

11. Where an Interrogatory cannot be answered in full, state why and furnish all available information.

12. If you assert as an objection to any of these Interrogatories that the information sought is privileged, please state the privilege that you believe is involved, identifying each such privilege with the specific Interrogatory number that seeks such privileged information. In those cases where an objection is made to an Interrogatory, all information covered by that Interrogatory but not subject to the objection should be provided.

INTERROGATORIES

1. Identify each person who contributes to the answers to these Interrogatories and any supplement to those answers.
2. Identify all individuals or entities with knowledge of the facts and circumstances raised by Plaintiff's Complaint or your Answer to Complaint.
3. List all "handles" or names under which you or, to your knowledge, Michele Colon have posted to the Internet or otherwise used in communications with any individual or entity regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff.
4. Identify and describe all communications you have had with any other individual or entity regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff, and include in your response, but do not limit that response to, the date of the communication, the method of communication, and the identity of the individual or entity who received or sent the communication.
5. Identify and describe all communications between you and Michele Colon regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you or Michele Colon to be associated with the Plaintiff.
6. Identify and describe all Internet postings made by you or in which you have been involved, or, to your knowledge, made by Michele Colon regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff at any time.
7. Pursuant to Rule 4:1 of the Rules of the Supreme Court of Virginia, identify each and every professional or expert you expect to call as an expert witness at trial, state the subject matter on which the expert is expected to testify, state the substance of the facts and opinions to which the expert is expected to testify, and provide a summary of the grounds for each opinion.
8. Identify each and every witness you intend to call at the trial of this action and provide a summary of each witness's testimony.

9. Identify any legal claims or lawsuits filed by or against you in the last ten (10) years, including the case style, case number, parties, and jurisdiction, agency, or other entity in which such claim or suit was filed.
10. Identify all of what you called in your Answer to Complaint “WMSCOG’s harmful and abusive methods,” including, but not limiting your response to, the specific individuals subjected to any such methods, those who subjected such individuals to such methods, and the dates, times, and locations where any such individuals were subjected to these methods.
11. Identify anyone you claim to be a “victim” and any member of the “families” you claim to have been “administering” as a result of actions of the Plaintiff (*See Answer to Complaint ¶27*).
12. Identify any recordings made by or with your involvement regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff, including, but not limiting your response to the date, location and reasons any such recording was made.
13. Identify and explain in detail what you call “questionable financial practices” and the basis for your statement “they totally have to be laundering money” (*See Answer to Complaint ¶33*).
14. Explain in detail all facts upon which you rely in support of each of the defenses raised in your Answer to Complaint, setting forth each fact which you claim supports each defense.
15. Identify and explain in detail all methods you have used to investigate the truth or falsity of your claims regarding Plaintiff, made directly or by denying in your Answer to Complaint having made any false statements, including, but not limited to, claims that the Plaintiff is a cult, uses harmful and abusive methods, is engaged in questionable financial practices, is laundering money, destroys marriages or families, uses mind control tactics, deceived the Points of Light Institute, uses fear and guilt as tactics, uses sleep deprivation, has a business relationship or financial connection to Big Shine Worldwide, Inc., and lied to the IRS. Include, but do not limit your response to the identity of any individuals with which you have had contact regarding those claims and any communications you have issued or received with regard to those claims.

16. Explain why you created the website www.examinethewmscog.com and describe in detail how that website came into being.
17. Identify all individuals or entities that have contributed to or have administrative access to the www.examinethewmscog.com website.
18. Explain how and why Michele Colon was given administrative access to the www.examinethewmscog.com website.
19. If you claim that any statement or document responsive to any Interrogatory or Request for Production has been destroyed, deleted, or is otherwise unavailable, identify each such statement or document, providing the date such statement or document was made or published, the last date that statement or document is known to have existed, what happened to that statement or document, and provide a summary of the content and meaning of that statement or document.
20. If you claim that Plaintiff has made any admission or statement against interest which you claim to be relevant to the claims or defenses in this matter, identify each admission or statement, providing the identity of anyone who heard or received such admission or statement, the date of any such admission or statement, how such admission or statement was made, where each such admission or statement was made, and a summary of the content and meaning of that admission or statement.
21. Identify any oral, written, or recorded statements taken by you or on your behalf in connection with the claims or defenses raised in this matter, providing the identity of anyone who heard or received such statement, the date of any such statement, how such statement was made, where each such statement was made, a summary of the content and meaning of that statement and the identity of anyone in possession of a copy of each statement.

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22. Identify any insurance agreements held by you that may be used to satisfy part or all of a judgment, if any, that may be entered in this action.

PLEASE BE ADVISED THAT YOU MAY BE REQUIRED TO SEASONABLY SUPPLEMENT YOUR RESPONSES.

Dated: 4-16-12

WORLD MISSION SOCIETY, CHURCH
OF GOD A NJ NONPROFIT CORPORATION

By: John W. Dozier, Jr. VSB44586 For JWD Jr.

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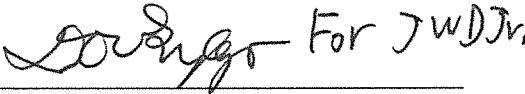
*Attorneys for Plaintiff
World Mission Society,
Church of God a NJ
Nonprofit Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April, 2012, the foregoing PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION PROPOUNDED TO DEFENDANT TYLER J.

NEWTON was transmitted to Lee E. Berlik, Esquire, Counsel for Defendants, via email to lberlik@berliklaw.com, facsimile to **(888) 772-0161**, and was deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to:

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