

**Exhibit 3**  
**Defendant's First Interrogatories to**  
**Plaintiff**

*Hale v. Federal Bureau of Prisons,*  
Case No. 23-cv-1296-DWD

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

MATTHEW HALE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Civil No. 23-cv-01296-DWD
	)	
FEDERAL BUREAU OF PRISONS,	)	
	)	
Defendant,	)	

**DEFENDANT’S FIRST SET OF INTERROGATORIES PROPOUNDED TO PLAINTIFF**

Defendant, by and through his attorneys, Steven D. Weinhoef, United States Attorney for the Southern District of Illinois, and Kyle Christopher Oehmke, provides these interrogatories under the authority of Rule 33 of the Federal Rules of Civil Procedure and SDIL-LR 33.1, and requests that you answer in writing and under oath within thirty (30) days from service hereof of the following:

**INTERROGATORIES**

1. State your affiliation with the World Church of the Creator, The Creativity Movement, and/or any other like-minded organization of which you ever have been and/or are presently a member, including the following information:

- a. The years of your affiliation with each organization;
- b. All titles, jobs, and honorifics held by you within each organization;
- c. The years you held such titles, jobs, and honorifics; and
- d. Describe your duties and responsibilities with respect to each stated title, job, and honorific.

2. State whether you ever held and/or presently hold the title of Pontifex Maximus with the World Church of the Creator, The Creativity Movement, and/or any other like-minded organization, including the following information:

- a. The years you held such title;
- b. Describe your duties and responsibilities as Pontifex Maximus;
- c. If you do not presently hold the title and/or identify as Pontifex Maximus of the World Church of the Creator, The Creativity Movement, and/or any other like-minded organization, identify the individual(s); and
- d. With respect to any individuals identified in response to Interrogatory 2(c), state the last time you communicated or attempted communication with such individual(s), the means of such communication, and the substance of such communication.

3. Since your arrival at FCI Marion, state whether you are and/or have you ever translated Mein Kampf or any other writings of Adolf Hitler? If so, include the following information:

- a. The year (and date) of such translation(s);
- b. The purpose of such translation(s);
- c. Whether you disseminated or attempted to disseminate such translation(s) outside of the Bureau of Prisons; and
- d. The reasons for such dissemination or attempted dissemination; and

e. Which translation(s), if any, were successfully disseminated outside of the Bureau of Prisons and to whom?

4. Since your arrival at FCI Marion, have you authored anything --- including but not limited to books, articles, correspondence, e-mail --- concerning the World Church of the Creator, The Creativity Movement, and/or any other like-minded organization? If so, including the following information:

- a. The year (and date) of such writing(s);
- b. The purpose of such writing(s);
- c. Whether you disseminated or attempted to disseminate such writing(s) outside of the Bureau of Prisons;
- d. The reasons for such dissemination or attempted dissemination; and
- e. Which writing(s), if any, were successfully disseminated outside of the Bureau of Prisons and to whom?

5. With respect to Count I of your lawsuit, have you ever succeeded in disseminating any portion(s) and/or chapter(s) of *The Triumph of Life: An Assault upon the Values of the Current Society* outside of the Bureau of Prisons? If so, state the following information:

- a. Which portion(s) and/or chapter(s) of such piece have been disseminated outside of the Bureau of Prisons, including when; and
- b. Which portion(s) and/or chapter(s) of such piece have never been disseminated outside of the Bureau of Prisons.

6. With respect to Count II of your lawsuit, have you ever succeeded in disseminating any portion(s) and/or chapter(s) of “Thoughts on My Transfer to Marion CMU” (either as originally written or as revised) outside of the Bureau of Prisons? If so, state the following information:

a. Which portion(s) and/or chapter(s) of such piece (either as originally written or as revised) have been disseminated outside of the Bureau of Prisons, including when; and

b. Which portion(s) and/or chapter(s) of such piece (either as originally written or as revised) have never been disseminated outside of the Bureau of Prisons.

7. With respect to Count VI of your lawsuit, have you ever succeeded in disseminating any portion(s) and/or chapter(s) of Racism: A Reappraisal outside of the Bureau of Prisons? If so, state the following information:

a. Which portion(s) and/or chapter(s) of such piece have been disseminated outside of the Bureau of Prisons, including when; and

b. Which portion(s) and/or chapter(s) of such piece have never been disseminated outside of the Bureau of Prisons.

8. With respect to Count V of your lawsuit, state the date(s), intended recipient(s), and content of ten exemplar writings authored by you that are the subject of such claim. A copy of such writings may be produced in lieu of written answer here.

9. State the portion(s), if any, of your lawsuit pertaining to actions taken by the Bureau of Prisons and its employees during your incarceration at ADX Florence.

Respectfully submitted,

STEVEN D. WEINHOFER  
United States Attorney

*s/ Kyle Christopher Oehmke*  
KYLE CHRISTOPHER OEHMKE  
Assistant United States Attorney  
United States Attorney's Office  
Nine Executive Drive  
Fairview Heights, IL 62208  
Phone: (618) 628-3700  
Fax: (618) 622-3810  
E-mail: [Kyle.Oehmke@usdoj.gov](mailto:Kyle.Oehmke@usdoj.gov)