Steve Mueller or Stephanie Pino will not be able to attend the disciplinary hearing. Steve Mueller and Stephanie Pino request the following objection be entered into the record of this proceeding:

OBJECTION FOR RECORD

Steve Mueller (Member No. 10425259), Stephanie Pino (Member No. 10359731) and their defense team object to procedure of this hearing as it does not conform to Texas statute. The accused have been denied key evidential materials by the Department of Texas on more than one occasion during the pre-trial process beginning in February. Considering the gravity of these allegations made by the Department of Texas and the refusal to produce materials of evidentiary purpose, when requested, it is increasingly difficult to feel this is a fair and honest proceeding or be afforded the opportunity to respond to the allegations as outlined in the Veterans of Foreign Wars of the United States Congressional Charter By-Laws Manuel of Procedures Ritual.

1. The hearing is in violation of the rules of civil procedure. The accused has not been granted the opportunity to conduct discovery. While it is true, the defense has received some information, including Report of Investigation, emails dated November 15, 2018, and Department of Texas correspondence dated November 16, 2018, November 30, 2018, December 6, 2018 and other documents labeled "Attachments" 1-41. The defense has not received the signed and notarized statements, as referenced in the letter sent from John Shipley to Ingeborg A. Conley on November 30, 2018 regarding the testimony of "Jeff Rankin (current post 4853 Commander), Doug Edwards (Current Post 4853 Sr. Vice Commander and Patricia Hewitt (current Post 4853 Quartermaster/ Adjutant)". The Defense has not been afforded opportunities to request production, requests answer to interrogatories and depositions. Several attempts were made to request production of evidentiary materials during the pre-trial stage from John Shipley and Dan West by our Defense team as early as February 2019, however to date that information has not been produced. The materials requested are essential to answering the charges brought against Stephanie Pino and Steve Mueller and the Defense team has been repeatedly denied access to them. By denying the Defense the request for Continuance on May 21, 2019, the Defense is being denied due process and equal and fair treatment. Without being granted access to the evidentiary materials, the accused cannot prepare an adequate response to the charges and specifications contained in Special Order 27 and Special Order 28 or offer any chance of rebuttal to testimony that may be given at the Disciplinary Hearing scheduled for May 23, 2019, starting at 9:00 a.m. at 8760 FM 2243 Leander, Texas 78641.

22MAY2019
Steve Mueller/ Member No. 10425259

22may2019
Stephanie Pino/ Member No. 10359731