



December 6, 2022

(VIA-EFS)

Tami L. Peterson  
Saxton Peterson Law Firm  
525 South Front Street  
Mankato, MN 56001

**Re: In re the Marriage of Brian Mittelstaedt and Ms. Ronda Mittelstaedt  
Court File No.: 81-FA-22-129**

Dear Ms. Peterson:

Regarding our discovery requests to you, your client is still significantly deficient in her production of documents. Please note the following deficiencies for which we have repeatedly asked, and you have ignored:

**Request for Production of Documents #3** - Any and all savings account records, money market account records, liquid asset account records, or similar asset account records, including but not limited to monthly/quarterly statements and pertinent summaries, for all such accounts, in your name individually or in which you have had an interest since January 1, 2021. This request includes accounts in which you have no ownership interest, but in which you have withdrawn from or deposited into: **You have not adequately supplemented this request. You must provide the following statements:**

**Janesville State Bank Checking x0029: 09/23/22 – 10/24/22**

**Janesville State Bank Savings x2950: 08/23/22 – present (or proof the account is closed)**

**Request for Production of Documents #7** - Monthly or Quarterly Statements for the past 36 months for any HSA, FSA, or Flex Account: **You have provided only 1 actual statement (11/1/22 – 11/30/22). Other than that, you have only provided transaction summaries, which do not provide monthly or quarterly balances. Again, please provide actual statements for the past 36 months.**

**Request for Production of Documents #9** - Any and all documents verifying both current indebtedness and indebtedness owed at the time of the parties' separation, owed by you jointly or individually, including but not limited to promissory notes, invoices, bills, and charge account statements: **We have asked numerous times for information related to any unsecured loans, specifically the details on two screenshot documents we received from you in discovery that do not include information regarding the bank. Your client has a responsibility to disclose her debts so you cannot just say "any other loan is with Affinity. You have releases of information." You also cannot claim, as you have previously, that these loans were for attorney's fees when at least one of them goes**



back to 2020. I am attaching the two documents in questions. Please provide **actual account statements** for these loans from 1/1/19 – present.

**Request for Production of Documents #14** – All monthly statements for all charge accounts, credit card accounts, debit accounts, expense accounts, reimbursement accounts, or other similar accounts which you use or are entitled to use since January 1, 2021: **You have not adequately supplemented this request with the most recent statements and still need to provide the following:**

**Old Navy Credit Card: 1/1/21 – present. Your client has never once provided us with a statement from her Old Navy Credit Card.**

**Request for Production of Documents #23** - Credit Report from within the past 6 months: **This request was made on 10/28/22 and has yet to be answered.**

**Request for Production of Documents #33** – **All** statements from your PAYPAL account with payments and receipts from 2019, 2020, and 2021. **You have provided only one statement (closing date 11/22/22). Please provide the remaining statements.**

Sincerely,

*/s/ Jason C. Kohlmeyer*

Jason C. Kohlmeyer  
Attorney

Cc: Mr. Mittelstaedt (*via email only*)

Encl.



ACCOUNT DETAILS

Account Name:  
UNSECURED LOAN

Account Nickname:  
UNSECURED LOAN

Loan ID:  
x [REDACTED] 👁 Show

Account Number:  
x [REDACTED] 👁 Show

Actual Balance:  
\$4,931.20

Annual Percentage Rate:  
13.99%

Regular Payment Amount:  
\$535.08

Payment Due Date:  
05/28/2022

Past Due Amount:  
\$0.00

Payoff Amount:  
\$4,950.10

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ACCOUNT HISTORY

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**EXHIBIT  
22**

## My Transactions

<b>PartialPmt 0.00 to 268.00</b> 03/03/2022	<b>\$268.00</b> \$4,931.20
<b>PartialPmt 268.00 to 0.00</b> 02/17/2022	<b>\$268.00</b> \$5,171.45
<b>PartialPmt 0.00 to 268.00</b> 02/03/2022	<b>\$268.00</b> \$5,410.42
<b>PartialPmt 268.00 to 0.00</b> 01/20/2022	<b>\$268.00</b> \$5,648.11
<b>PartialPmt 0.00 to 268.00</b> 01/06/2022	<b>\$268.00</b> \$5,884.53
<b>PartialPmt 268.00 to 0.00</b> 12/23/2021	<b>\$268.00</b> \$6,119.69
<b>PartialPmt 0.00 to 268.00</b> 12/09/2021	<b>\$268.00</b> \$6,353.60
<b>PartialPmt 268.00 to 0.00</b> 11/25/2021	<b>\$268.00</b> \$6,586.26
<b>PartialPmt 0.00 to 268.00</b> 11/11/2021	<b>\$268.00</b> \$6,817.68
<b>AddPrinc 228.95</b> 10/28/2021	<b>\$268.00</b> \$7,047.86
<b>PartialPmt 268.00 to 0.00</b> 10/14/2021	<b>\$268.00</b> \$7,276.81
<b>PartialPmt 0.00 to 268.00</b> 09/30/2021	<b>\$268.00</b> \$7,504.54
<b>PartialPmt 268.00 to 0.00</b> 09/16/2021	<b>\$268.00</b> \$7,731.05
<b>PartialPmt 0.00 to 268.00</b> 09/02/2021	<b>\$268.00</b> \$7,956.36

<b>PartialPmt 268.00 to 0.00</b> 08/19/2021	<b>\$268.00</b> \$8,180.46
<b>PartialPmt 0.00 to 268.00</b> 08/05/2021	<b>\$268.00</b> \$8,403.37
<b>PartialPmt 268.00 to 0.00</b> 07/22/2021	<b>\$268.00</b> \$8,625.09
<b>PartialPmt 0.00 to 268.00</b> 07/08/2021	<b>\$268.00</b> \$8,845.62
<b>PartialPmt 268.00 to 0.00</b> 06/24/2021	<b>\$268.00</b> \$9,064.98
<b>PartialPmt 0.00 to 268.00</b> 06/10/2021	<b>\$268.00</b> \$9,283.17

## My Transactions

<b>AddPrinc 215.86</b>	<b>\$268.00</b>
05/27/2021	\$9,500.19
<b>PartialPmt 268.00 to 0.00</b>	<b>\$268.00</b>
05/13/2021	\$9,716.05
<b>PartialPmt 0.00 to 268.00</b>	<b>\$268.00</b>
04/29/2021	\$9,930.76
<b>PartialPmt 268.00 to 0.00</b>	<b>\$268.00</b>
04/15/2021	\$10,144.33
<b>PartialPmt 0.00 to 268.00</b>	<b>\$268.00</b>
04/01/2021	\$10,356.76
<b>PartialPmt 268.00 to 0.00</b>	<b>\$268.00</b>
03/18/2021	\$10,568.05
<b>PartialPmt 0.00 to 268.00</b>	<b>\$268.00</b>
03/04/2021	\$10,778.21
<b>PartialPmt 268.00 to 0.00</b>	<b>\$268.00</b>
02/18/2021	\$10,987.25
<b>PartialPmt 0.00 to 268.00</b>	<b>\$268.00</b>
02/04/2021	\$11,195.18
<b>PartialPmt 268.00 to 0.00</b>	<b>\$268.00</b>
01/21/2021	\$11,402.00
<b>PartialPmt 0.00 to 268.00</b>	<b>\$268.00</b>
01/07/2021	\$11,607.71
<b>PartialPmt 286.40 to 0.00</b>	<b>\$268.00</b>
12/24/2020	\$11,812.32
<b>PartialPmt 18.40 to 286.40</b>	<b>\$268.00</b>
12/10/2020	\$12,015.84
<b>PartialPmt 285.48 to 18.40</b>	<b>\$268.00</b>
12/10/2020	\$12,283.84

<b>PartialPmt 17.48 to 285.48</b> 11/25/2020	<b>\$268.00</b> \$12,480.09
<b>PartialPmt 284.56 to 17.48</b> 11/12/2020	<b>\$268.00</b> \$12,684.88
<b>PartialPmt 16.56 to 284.56</b> 10/29/2020	<b>\$268.00</b> \$12,883.75
<b>PartialPmt 283.64 to 16.56</b> 10/01/2020	<b>\$268.00</b> \$13,012.10



ACCOUNT DETAILS

Account Name:  
UNSECURED LOAN

Account Nickname:  
UNSECURED LOAN

Loan ID:  
x0604 👁 Show

Account Number:  
x8726 👁 Show

Actual Balance:  
\$6,819.48

Annual Percentage Rate:  
7.49%

Regular Payment Amount:  
\$256.22

Payment Due Date:  
12/04/2022

Past Due Amount:  
\$0.00

Payoff Amount:  
\$6,837.67

 [Edit Nickname](#)

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DRAWINGS!**

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## My Transactions

<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>
10/13/2022	\$6,819.48
<b>PartialPmt 128.11 to 0.00</b>	<b>\$128.11</b>
09/29/2022	\$6,927.69
<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>
09/15/2022	\$7,035.59
<b>PartialPmt 128.11 to 0.00</b>	<b>\$128.11</b>
09/01/2022	\$7,143.18
<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>
08/18/2022	\$7,250.46
<b>PartialPmt 128.11 to 0.00</b>	<b>\$128.11</b>
08/04/2022	\$7,357.43
<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>
07/21/2022	\$7,464.10
<b>PartialPmt 128.11 to 0.00</b>	<b>\$128.11</b>
07/07/2022	\$7,570.46
<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>
06/23/2022	\$7,676.52
<b>PartialPmt 128.11 to 0.00</b>	<b>\$128.11</b>
06/09/2022	\$7,782.27
<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>
05/26/2022	\$7,887.72
<b>PartialPmt 128.11 to 0.00</b>	<b>\$128.11</b>
05/12/2022	\$7,992.87
<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>
04/28/2022	\$8,097.72
<b>x8726/RONDA MITTELSTAEDT</b>	<b>-\$8,212.35</b>
04/20/2022	\$8,212.35


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## ACCOUNT HISTORY

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<b>PartialPmt 0.00 to 128.11</b> 10/13/2022	<b>\$128.11</b> \$6,819.48	▾
<b>PartialPmt 128.11 to 0.00</b> 09/29/2022	<b>\$128.11</b> \$6,927.69	▾
<b>PartialPmt 0.00 to 128.11</b> 09/15/2022	<b>\$128.11</b> \$7,035.59	▾
<b>PartialPmt 128.11 to 0.00</b> 09/01/2022	<b>\$128.11</b> \$7,143.18	▾
<b>PartialPmt 0.00 to 128.11</b> 08/18/2022	<b>\$128.11</b> \$7,250.46	▾
<b>PartialPmt 128.11 to 0.00</b> 08/04/2022	<b>\$128.11</b> \$7,357.43	▾
<b>PartialPmt 0.00 to 128.11</b> 07/21/2022	<b>\$128.11</b> \$7,464.10	▾
<b>PartialPmt 128.11 to 0.00</b> 07/07/2022	<b>\$128.11</b> \$7,570.46	▾
<b>PartialPmt 0.00 to 128.11</b> 06/23/2022	<b>\$128.11</b> \$7,676.52	▾
<b>PartialPmt 128.11 to 0.00</b>	<b>\$128.11</b>	▾

06/09/2022	\$7,782.27	^
<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>	>
05/26/2022	\$7,887.72	>
<b>PartialPmt 128.11 to 0.00</b>	<b>\$128.11</b>	>
05/12/2022	\$7,992.87	>
<b>PartialPmt 0.00 to 128.11</b>	<b>\$128.11</b>	>
04/28/2022	\$8,097.72	>
<b>x8726/RONDA MITTELSTAEDT</b>	<b>-\$8,212.35</b>	>
04/20/2022	\$8,212.35	>