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STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

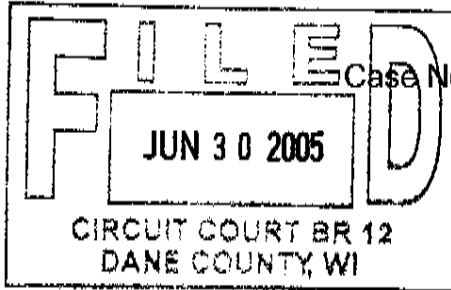
STATE OF WISCONSIN,

Plaintiff,

v.

CHARLES CHVALA,

Defendant.



Case No.: 02-CF-2451

**DEFENDANT'S DISCLOSURE OF POTENTIAL LAY WITNESSES**

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Defendant Charles Chvala by his attorneys Lawton & Cates, S.C. by Attorney James A. Olson and Attorney Bruce M. Davey hereby names and discloses the following lay witnesses who may be called upon to give testimony at the time of trial in the above matter:

1. Mr. Robert Anderson
2. Mr. Jonathan Becker
3. Mr. David Benforado
4. Mr. Michael Blumenfeld
5. Mr. Lynn Breedlove
6. Mr. Mike Browne
7. Mr. Charles Brownlow
8. Ms. Patricia Burke
9. Mr. Michael Butera
10. Mr. Andrew Cohn
11. Mr. Wayne Corey

12. Mr. Roy de la Rosa
13. Mr. Brent Embrey
14. State Senator Jon Erpenbach
15. Mr. Brandon Erickson
16. Mr. Lou Fortis
17. Mr. Andrew Franken
18. Mr. Paul Gabriel
19. Mr. Richard Gale
20. Mr. William Gerrard
21. Mr. Samuel Gratz
22. Mr. Jim Haney
23. Ms. Lynn Haanen
24. Mr. Brian Hartung
25. Mr. Douglas Haselow
26. Mr. Paul Heinen
27. Mr. Steven Hiniker
28. Mr. Jon Hochkammer
29. Mr. Todd Holschbach
30. Mr. Edward Huck
31. Mr. John Huebscher
32. Mr. David Jenkins
33. Mr. Jason Kay
34. Mr. Ross Kinzler

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- 35. Mr. James Klauser
- 36. Mr. David R. Kluesner
- 37. Jason Kratochwill
- 38. Ms. Shirley Krug
- 39. Ms. Michelle Kussow
- 40. Mr. Mark Larson
- 41. Mr. Michael Leffel
- 42. Mr. Russell Leonard
- 43. Ms. Carrie Lynch
- 44. Mr. John Manske
- 45. Ms. Cindy Maracek
- 46. Ms. Helen Marks
- 47. Mr. Cory Mason
- 48. Ms. Christine Matthews
- 49. Mr. John Matthews
- 50. Mr. Pierre McCormick
- 51. Mr. William McCoshen
- 52. Ms. Paula McGuire
- 53. Ms. Sue Meinholz
- 54. Mr. Rodney Moen
- 55. Mr. Michael Moore
- 56. Mr. Phillip Neuenfeldt
- 57. Mr. David Newby

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58. Mr. James O'Keefe
59. Ms. Mary Panzer
60. Mr. Curt Pawlisch
61. Mr. John Peacock
62. Mr. Eric Petersen
63. Mr. John Peterson
64. Mr. Phil Prange
65. Mr. Jim Pugh
66. Ms. Lisa Purtell
67. Mr. Joseph Quick
68. Records Custodian, Wisconsin Department of Natural Resources
69. Records Custodian, Wisconsin Department of Administration
70. Records Custodian, Wisconsin State Historical Society
71. Records Custodian, Wisconsin State Elections Board
72. Records Custodian, Wisconsin State Ethics Board
73. Record Custodian, Wisconsin State Senate
74. Records Custodian, Wisconsin State Assembly
75. State Representative Kitty Rhodes
76. Mr. William S. Ried
77. Representative of Wisconsin Elections Board
78. Mr. Adam Rich
79. Mr. Keith Roepelle
80. Mr. Erin Roth

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81. Mr. Michael Rogowski
82. Mr. Donald Schneider
83. Mr. Martin Schreiber
84. Mr. Michael Serpe
85. Mr. Paul Sicula
86. Mr. Jeffrey Simmons
87. Mr. Tim Sullivan
88. Ms. Gail Sumi
89. Mr. Joseph Strohl
90. Mr. James Tenuta
91. Mr. Craig Thompson
92. Mr. Michael Tierney
93. Mr. Michael Vaughan
94. Mr. Jay Wadd
95. Mr. Thomas Walker
96. Mr. Kenneth Walsh
97. Mr. Lance Walter
98. Mr. Daniel Weinstein
99. Ms. Branda Weix
100. Ms. Ellen Wiebe
101. Mr. Mark Williamson
102. Ms. Maribeth Witzel
103. Ms. Barbara Worchester

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104. Ms. Becky Young

**ADVERSE WITNESSES<sup>1</sup>**

105. Ms. Heidi Bisswurm

106. Mr. Bradley Kust

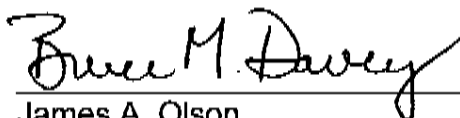
107. Mr. Aaron Weiss

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The Defendant reserves the right to name additional lay witnesses should the need arise due to new information discovered prior to the time of trial. Additionally, the Defendant reserves the right to call any lay witnesses designated by other parties to this action, and any additional witnesses necessary impeachment and sur-rebuttal witnesses. Counsel for the Defendant additionally reserves the right to call the Defendant, Charles Chvala, as a witness in the above matter.

Dated this 30<sup>th</sup> day of June 2005.

**BY: LAWTON & CATES, S.C.**



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State Bar No. 1009442

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Attorneys for Defendant Charles Chvala.

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<sup>1</sup> Defendant may also call adversely any other investigators utilized by the State of Wisconsin in the above matter.