

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

STATE OF GEORGIA,

v.

KENNETH CHESEBRO et al.,

Defendant.

INDICTMENT NO. 23SC188947

JUDGE McAFEE

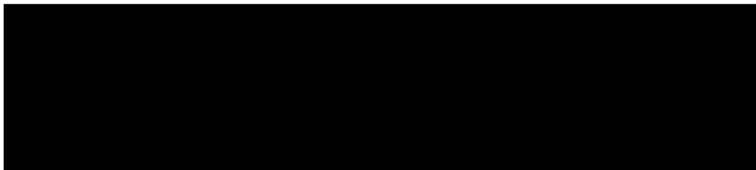
**DEFENDANT'S FIRST COMPLIANCE WITH  
DISCOVERY OBLIGATIONS**

COMES NOW, Defendant Kenneth Chesebro and respectfully provides notice of the following evidence and witness(es) for the 10/23/23 trial, in accordance with O.C.G.A. §17-16-4 et seq.:

1) Joseph Brannan



2) James "Ken" Carroll



3) Jonathan S. Massey



o 1000 Maine Ave. SW, Washington D.C. 20024

4) Vikki Townsend Consiglio



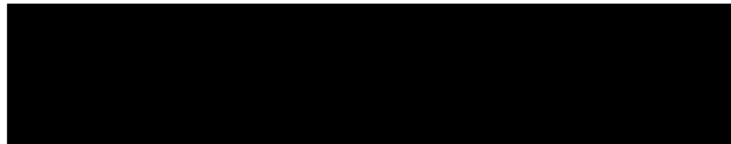
5) Carolyn Hall Fisher



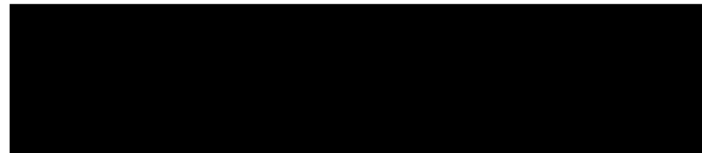
6) Honorable Burt Jones



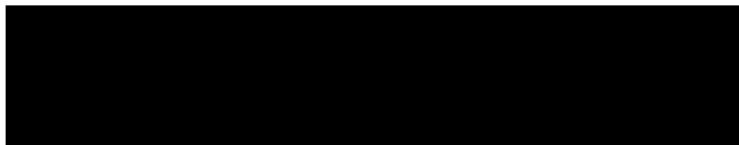
7) Gloria Kay Godwin



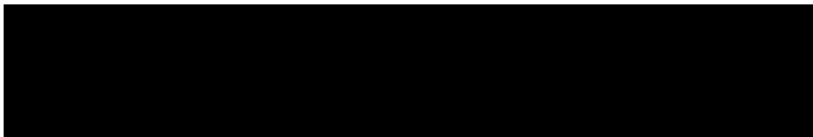
8) David G. Hanna



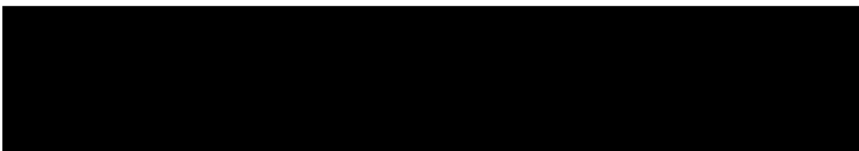
9) Mark W. Hennessy



10) Mark Amick



11) John Downey



12) Daryl Moody



13) Brad Carver



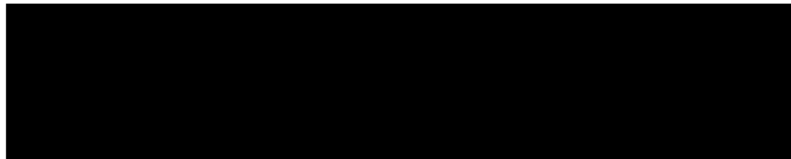
14) Thomas King III



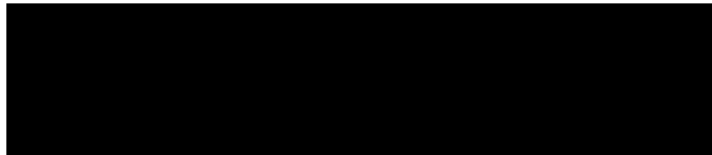
15) Lawrence Lessig (A summary of Mr. Lessig's CV and testimony will be provided upon receipt)



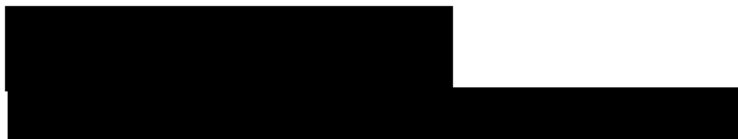
16) Matt Morgan



17) Joshua Findlay



18) Pat Philbin



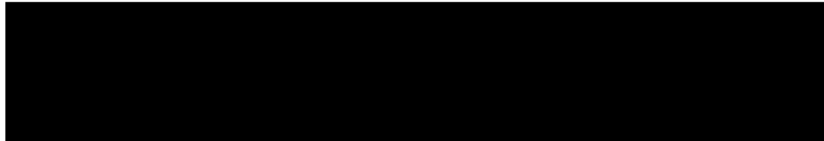
19) Justin Clark



20) Boris Epshteyn



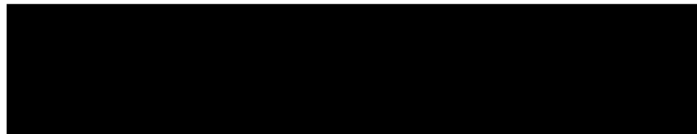
21) Bernard Kerik



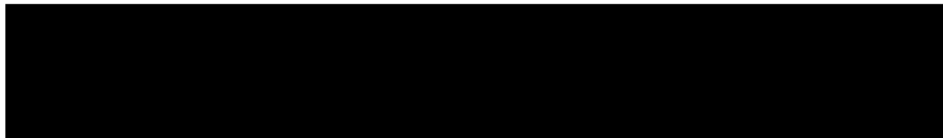
22) Andrew Hitt



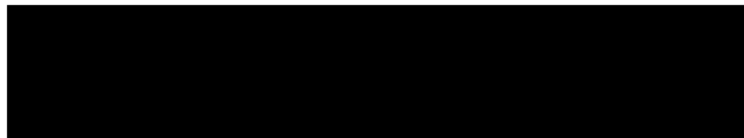
23) Brian Schimming



24) Joe Olson



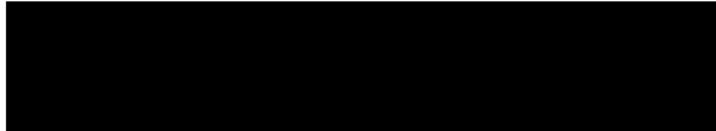
25) Mark Jefferson



26) Don Millis



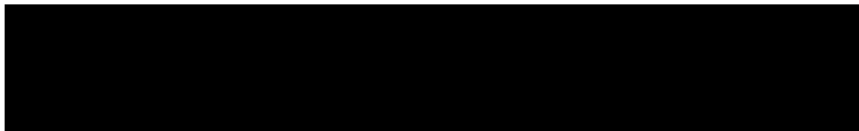
27) George Burnett



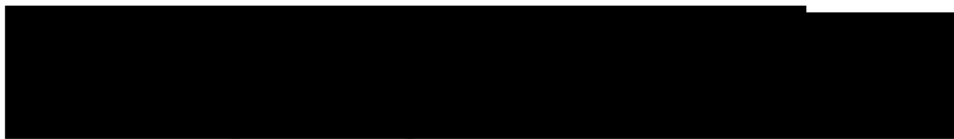
28) James Troupis



29) Josh Kaul



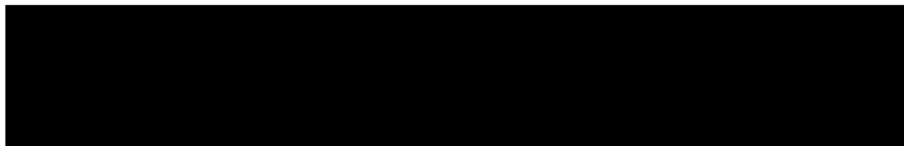
30) Robert Spindell



31) Austin Browning

- Information to be provided upon receipt

32) Jon Black



33) Clayton Henson



[Redacted]

34) Jeremy Hughes

[Redacted]

35) Brian Seitchik

[Redacted]

36) Richard Esenberg

[Redacted]

37) Brian McGrath

[Redacted]

38) Luke Berg

[Redacted]

39) Katherine Spitz

[Redacted]

40) Lawrence Tabas

[Redacted]

41) Jesse Binnall



42) Jim Degraffenreid



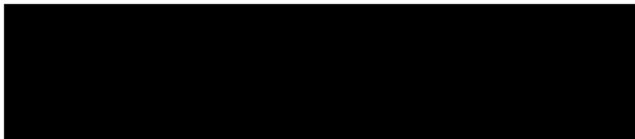
43) Kathy Berden



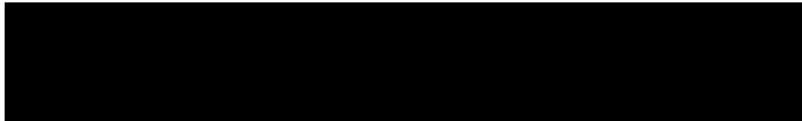
44) Greg Safsten



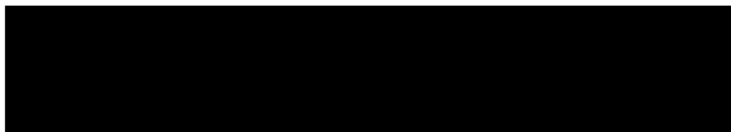
45) Jack Wilenchik



46) Ronna McDaniel



47) Van Jones



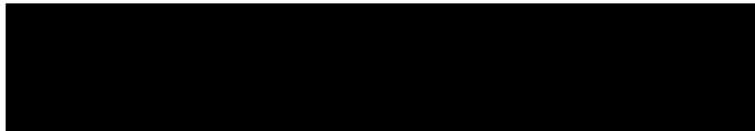
48) Robert Sinners



49) Anne Hansen



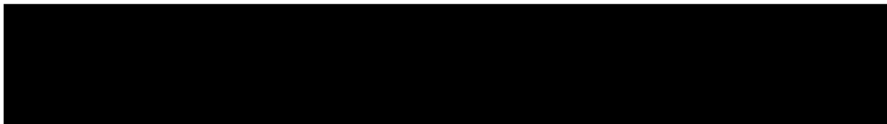
50) Ben Jones



51) Kurt Hilbert



52) Mark Post



53) Documents will be sent to the State via separate email on September 20, 2023. These files will be transmitted via .zip file.

54) There are additional files that may need to be turned over once the privilege issue is resolved by the Court.

55) Counsel has contacted the attorneys involved in numerous state court proceedings involving election matters (civil cases) in other jurisdictions and has received a portion of their files. Counsel for the State can pick-up these documents from the Arora Law Firm (address below).

- 75 W. Wieuca Rd, Atlanta, GA 30342



56) Any witnesses that may be listed in the government's list of witnesses as mandated by O.C.G.A. § 17-16-8.

Respectfully submitted this 20<sup>th</sup> day of September, 2023.

/s/ Scott R. Grubman  
SCOTT R. GRUBMAN  
Georgia Bar No. 317011  
Counsel for Defendant

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/s/ Manubir S. Arora  
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Georgia Bar No. 061641  
Attorney for Defendant

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Atlanta, Georgia 30342  
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing  
**DEFENDANT'S FIRST COMPLIANCE WITH DISCOVERY OBLIGATIONS** upon  
all counsel via the Fulton County e-filing system.

This 20<sup>th</sup> day of September, 2023.

/s/ Scott R. Grubman  
SCOTT R. GRUBMAN  
Georgia Bar No. 317011  
Counsel for Defendant

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