

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 SECOND 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. (please note that the personal information for each witness has been sanitized but that information has been provided to the State):

- 1) Greg Bluestein (via attorney Thomas Clyde -- (404) 815-6038)

[REDACTED]

- 2) Kimberly Bourroughs Debrow

[REDACTED]

- 3) Richard Elliott (via attorney Andrew Siegel -- (404) 873-7016)

[REDACTED]

- 4) Michael Murphy

[REDACTED]



- 5) Social Media post and photo taken by Richard Elliott dated 12/14/20.
- 6) Social Media posts from Greg Bluestein dated 12/4/20.
- 7) Wisconsin DOJ memo to the Wisconsin Elections Commission dated 2/9/22.
- 8) 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 6th day of October, 2023.

/s/ Scott R. Grubman
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Georgia Bar No. 317011
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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 SECOND COMPLIANCE WITH DISCOVERY OBLIGATIONS
upon all counsel via the Fulton County e-filing system.

This 6th day of October, 2023.

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

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