

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

Donald J. Trump, Candidate for President  
of the United States of America,

Plaintiff,

vs.

Case No. 2:-20-cv-01785-BHL

The Wisconsin Elections Commission, and its  
members, Ann S. Jacobs, Mark L. Thomsen,  
Marge Bostelman, Dean Knudson, Robert F.  
Spindell, Jr., in their official capacities, Scott  
McDonell in his official capacity as the Dane  
County Clerk, George L. Christenson in his  
official capacity as the Milwaukee County Clerk,  
Julietta Henry in her official capacity as the  
Milwaukee Election Director, Claire Woodall-  
Vogg in her official capacity as the Executive  
Director of the Milwaukee Election Commission,  
Mayor Tom Barrett, Jim Owczarski, Mayor Satya  
Rhodes-Conway, Maribeth Witzel-Behl, Mayor  
Cory Mason, Tara Coolidge, Mayor John  
Antaramian, Matt Krauter, Mayor Eric Genrich,  
Kris Teske, in their official Capacities; Douglas J.  
La Follette, Wisconsin Secretary of State, in his  
official capacity, and Tony Evers, Governor of  
Wisconsin, in his Official capacity.

Defendants.

**PLAINTIFF’S WITNESS LIST**

Plaintiff Donald J. Trump, by counsel, identifies the witnesses he presently intends to call at the hearing in this matter pursuant to paragraph 2 of the Court’s Minutes and Order of December 4, 2020 (Doc. 45). Plaintiff presently expects to call the following witnesses at the hearing in this matter:

## Witnesses

1. Meagan Wolfe – Wisconsin Elections Commission Administrator

**Contact information:** Ms. Wolfe can be contacted through counsel for Defendant Wisconsin Elections Commission.

**Areas of anticipated testimony:** Ms. Wolfe will be questioned about the policies, procedures and activities of the Wisconsin Elections Commission and in relation to 2020 elections in Wisconsin or such other elections as may relate to or be compared to the 2020 election, including, but not limited to, funding, training, directives, interpretations and other communications issued to election officials.

2. Maribeth Witzel-Behl – Madison City Clerk

**Contact information:** Defendant Witzel-Behl can be contacted through her counsel.

**Areas of anticipated testimony:** Defendant Witzel-Behl will be questioned about election planning, administration, funding and activities undertaken related to elections in the City of Madison in 2020, and regarding the policies, procedures and activities of the Wisconsin Elections Commission and in relation to 2020 elections in Wisconsin or such other elections as may relate to or be compared to the 2020 election, including, but not limited to, guidances, directives, interpretations and other communications issued to election officials.

3. Claire Woodall-Vogg – Milwaukee Election Commission Executive Director

**Contact information:** Defendant Woodall-Vogg can be contacted through her counsel.

**Areas of anticipated testimony:** Defendant Woodall-Vogg will be questioned about election planning, administration, funding and activities undertaken related to elections in Milwaukee in 2020, and regarding the policies, procedures and activities of the Wisconsin Elections Commission and in relation to 2020 elections in Wisconsin or such other elections as

may relate to or be compared to the 2020 election, including, but not limited to, guidances, directives, interpretations and other communications issued to election officials.

4. Tom Barrett – Milwaukee Mayor

**Contact information:** Defendant Barrett can be contacted through his counsel.

**Areas of anticipated testimony:** Defendant Barrett will be questioned about election planning, administration, funding and activities undertaken related to elections in the Milwaukee in 2020, his communications with fellow mayors and other public officials regarding the 2020 election and regarding the policies, procedures and activities of the Wisconsin Elections Commission and in relation to 2020 elections in Wisconsin or such other elections as may relate to or be compared to the 2020 election, including, but not limited to, guidances, directives, interpretations and other communications issued to election officials.

5. Bartholomew (“Bart”) Williams

**Contact information:** 2420 Skyline Drive, West Bend, WI 53090

**Areas of anticipated testimony:** Mr. Williams served as an observer at the Milwaukee Central Count on Election Day and is expected to testify concerning his personal experience and observations that day, including limits that were placed on a meaningful opportunity to observe certain activities and ballots being counted, certain actions of ballot counters, status and condition of the absentee ballots and envelopes observed, and instructions that were provided to inspectors and ballot counters for counting or challenging absentee ballots.

6. Daniel Miller

**Contact information:** 931 E Auer Ave, Milwaukee, WI 53212-2213

**Areas of anticipated testimony:** Mr. Miller served as a ballot counter at the Milwaukee Central Count on Election Day and is expected to testify concerning his personal experience and

observations that day, including limits that were placed on a meaningful opportunity for observers to observe certain activities and the absentee ballots being counted, certain actions of ballot counters and election officials, the status and condition of absentee ballots and envelopes, and instructions that were provided to inspectors and ballot counters for counting or challenging absentee ballots.

7. David Bolter

**Contact information:** 2761 South 43rd Street, Milwaukee, WI 53219

**Areas of anticipated testimony:** Mr. Bolter served as a ballot counter at the Milwaukee Central Count on Election Day and is expected to testify concerning his personal experience and observations that day, including limits that were placed on a meaningful opportunity for observers to observe certain activities and the absentee ballots being counted, actions of ballot counters and election officials, the status and condition of absentee ballots and envelopes, and instructions that were provided to inspectors and ballot counters for counting or challenging absentee ballots.

Respectfully Submitted,

KROGER, GARDIS & REGAS, LLP

/s/ William Bock, III

William Bock III, Indiana Attorney No. 14777-49

James A. Knauer, Indiana Attorney No. 5436-49

Kevin D. Koons, Indiana Attorney No. 27915-49

ATTORNEYS FOR PLAINTIFF DONALD J. TRUMP

KROGER, GARDIS & REGAS, LLP  
111 Monument Circle, Suite 900  
Indianapolis, IN 46204  
Phone: (317) 692-9000

**CERTIFICATE OF SERVICE**

A copy of the foregoing document was served upon all parties' counsel of record via this Court's CM/ECF service on this 6th day of December, 2020.

/s/ William Bock, III