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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

RANDALL KOWALKE,)
)
Plaintiff,)
)
vs.)
)
DAVID EASTMAN,)
STATE OF ALASKA DIVISION OF)
ELECTIONS, and)
GAIL FENUMIAL,)
)
Defendants.)

FILED in the TRIAL COURTS
State of Alaska Third District

DEC 06 2022

Clerk of the Trial Courts
By _____ Deputy

Case No. 3AN-22-07404 CI

DEFENDANT DAVID EASTMAN'S
FINAL WITNESS LIST

COMES NOW Defendant David Eastman ("Representative Eastman" or "Mr. Eastman"),
by and through the Law Offices of Joseph Miller, LLC, and hereby provides this Witness List
pursuant to the Court's Amended Pretrial Order:

1. David Eastman
c/o Law Office of Joseph Miller
P.O. Box 83440
Fairbanks, AK 99708
907-451-8559
Attorney/Client Privilege
2. Randall Kowalke
c/o Savannah Fletcher
406 G Street, Suite 207
Anchorage, AK 99501
(907) 308-3395
Attorney/Client Privilege
3. Stewart Rhodes

WITNESS LIST

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LAW OFFICES OF JOSEPH MILLER, LLC

P.O. BOX 83440

Fairbanks, AK 99708

OFFICE (907) 451-8559 • FAX (888) 421-8803

Alexandria City Detention Center
2001 Mill Road
Alexandria, Virginia 22314
(703) 746-5000

(founder and officer of Oath Keepers; testimony regarding organization, activities, mission, and other aspects of the Oath Keepers as well as actions on 1/6/21, and whether Oath Keepers is an organization that advocates, by force or violence the overthrow of government; he is presently incarcerated, creating potential problems regarding testimony)

4. Michael Greene
General Delivery
Indianapolis, IN 46107
(Oath Keepers operations leader for events on 1/6/21 who will testify as to why the Oath Keepers came to Washington D.C. on that date, and whether Oath Keepers is an organization that advocates, by force or violence the overthrow of government; he is presently incarcerated, creating potential problems regarding testimony)
5. Stephen Horn
[REDACTED]
Youngsville NC 27596
[REDACTED]
[REDACTED] t who was in the Capitol on 1/6/21 and observed the Oath Keepers actions there)
6. Michael Nichols
General Delivery
King Ferry, NY 13081
[REDACTED]
(Individual who was in the Capitol on 1/6/21 and observed the Oath Keepers actions there and whether Oath Keepers is an organization that advocates, by force or violence the overthrow of government; involved in leadership of Oath Keepers)
7. Kelly Meggs
Correctional Treatment Facility
Department of Corrections
1901 E Street, SE
Washington, DC 20003
(202)-698-4932
(Oath Keeper leader who will testify as to why the Oath Keepers went to Washington D.C. on 1/6/21 and whether it is an organization that advocates, by force or violence the overthrow of government; he is presently incarcerated, creating potential problems regarding testimony)
8. John L. Siemens
General Delivery

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San Antonio, TX 78257

(Oath Keeper leader who will testify as to why the Oath Keepers went to Washington D.C. on 1/6/21, its organization, its mission, and other aspects regarding the organization, including whether it is an organization that advocates, by force or violence the overthrow of government; he is presently suffering from significant health issues, creating potential problems regarding testimony)

9. Dario Ruben Aquino

[REDACTED]
Wellington, Florida, 33414
[REDACTED]

(individual who observed leaders of the Oath Keepers on 1/6/21 and what these leaders did upon hearing about the protests and/or chaos at the Capitol on 1/6/21)

10. Kenneth Harrelson

Correctional Treatment Facility
Department of Corrections
1901 E Street, SE
Washington, DC 20003
(202)-698-4932

(Oath Keeper member who escorted VIPs from the Ellipse rally to the Capitol to attend a permitted rally on Capitol grounds, and what he observed at the Capitol grounds when he was there on 1/6/21; he is presently incarcerated, creating potential problems regarding testimony)

11. Ali Alexander

General Delivery
Fort Worth, TX 76101

(Organizer and planned speaker for the permitted rally at the Capitol grounds and the purpose of the presence of Oath Keepers at that rally on 1/6/21)

12. Stephen Brown

[REDACTED]
Lakeland, FL 33811
[REDACTED]

(Event planner who was responsible for the arrangements for Oath Keepers to be at the rally on the Capitol grounds on 1/6/21)

13. Eric Maynard

[REDACTED]
Hanover, MD 21076
[REDACTED]

(a vendor at the permitted rally on the Capitol grounds who observed the Oath Keepers and what they were doing at that rally on 1/6/21)

14. Kylie Jane Kremer

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Fairbanks, AK 99708

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P.O. Box 72861
Marietta, GA 30007

[REDACTED]
(Individual who was present in Washington D.C. on 1/6/21 and observed Oath Keepers actions there)

15. Caroline Wren
P.O. Box 72861
Marietta, GA 30007

[REDACTED]
(Advisor for Women for America First rally at the Ellipse who will testify that the Oath Keepers were in Washington, D.C. to provide security and logistical support at the rally on the Ellipse on 1/6/21)

16. Maggie Mulvaney
P.O. Box 72861
Marietta, GA 30007

[REDACTED]
(VIP lead for Women for America First rally at the Ellipse who will testify that the Oath Keepers were in Washington, D.C. to provide security and logistical support at the rally on the Ellipse on 1/6/21)

17. Laura Geiswiler
[REDACTED]
Long Island City, NY 11101

(Journalist/cameraman who took a continuous camera recording of Capitol showing the arrival of Oath Keepers, their actions at the Capitol, and why many could not leave)

18. John Eastman
[REDACTED]
Claremont, CA 91711

[REDACTED]
Expert – Constitutional Law, First Amendment, Election Law
(expected to testify regarding constitutionally protected speech as it relates to statements of the Oath Keepers, the organization of the Oath Keepers, and aspects of election law as it relates to the events of 1/6/21 in Washington D.C.)

19. John Guandolo
General Delivery
Dallas, TX 75001
Expert – National Security, Counter Terrorism

[REDACTED]
(former FBI agent with experience in counter-terrorism and domestic threats; expected to testify regarding the Oath Keepers and its advocacy or not of force or violence against government)

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20. Pat Martin
[REDACTED]
Wasilla, AK 99654
[REDACTED]
(individual who was present with Defendant David Eastman in Washington D.C. at all relevant times on 1/6/21; expected to testify regarding Defendant's association with Oath Keepers, trip to Washington D.C., and Defendant's advocacy or not of threat or violence against government)
21. James Bright
[REDACTED]
Dallas, TX 75219
[REDACTED]
(Counsel for certain Oath Keepers, present at last month's trial that resulted in the conviction of Stewart Rhodes and other Oath Keeper members; will testify regarding that trial, the convictions, the organization, bylaws, and other aspects of the Oath Keepers organization)
22. All witnesses necessary to lay the foundation for demonstrative aids and compilations of evidence.
23. All witnesses necessary for rebuttal.
24. All witnesses disclosed through further discovery or pretrial preparation.
25. Employees, owners, and/or agents of Plaintiff and any Co-Defendant.
26. The records custodian of any exhibit that the opposing party will not stipulate to as authentic, or any other witness to authenticate evidence.

DATED this 5th day of December 2022, at Fairbanks, Alaska.

LAW OFFICES OF JOSEPH MILLER, LLC

By: s/ Joseph Miller – Bar Number 9511067
Attorney for Defendant

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