

Name, Address, Phone Number	Brief description of the witness' relevant knowledge (non-exclusive)
<p>Tamborine Borrelli 14511 George Rd SE Yelm, WA 98597 253-375-1255</p>	<p>Public Records Request; cast ballots anonymous; Senate Bill 5459; penalties for failure to comply with Public Records Request, including, use of uncertified system; data and findings of election process issues of vote flipping, additions, and deletions in the 2020 General Election.</p>
<p>Steve Gibson 8110 206th Ave E Bonney Lake, WA 98391 605-315-4821</p>	<p>Data analysis of 2020 General Election official reporting results; party preference tracking in ballot reports.</p>
<p>Jovan H. Pulitzer 10900 Research Blvd Suite 160C-95 Austin, Texas 78759 646-656-1876</p>	<p>Ballot-forensic expert witness opinions and related testimony; analysis of public records requested by WEICU (records currently unavailable due to refusal by Defendants/Counter-claimants to allow examination). Resume: https://www.academia.edu/40879071/Jovan_Hutton_Pulitzer_Short_Resume</p>
<p>Amber Krabach 12925 206th Ave NE Woodinville, WA 98077 425-686-5299</p>	<p>Authentication of video-recording of King County elections personnel; personnel instructed to not leave zip ties tight on ballot containers; lack of ballot security.</p>
<p>Harlyn Thompson 38800 Creekside Loop Apt. 114 Sandy, OR 97055 (360) 567-7676</p>	<p>Authentication of video-recording of meeting with Clark County Auditor; no 'secrecy' concerns possible with cast ballot review, as cast ballots are anonymous and may not be tied back to a voter.</p>

DISCLOSURE OF POSSIBLE PRIMARY WITNESSES

Virginia P. Shogren, P.C.
961 Oak Court
Sequim WA 98382
360-461-5551

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Terpsehore Maras 410 Superior Ave #14597 Cleveland, OH 44114	Declaration dated November 29, 2020 filed in <i>Feehan v. Wisconsin Elections Commission</i> , Case No. 2:20-cv-01771-PP; ProV&V accreditation with Election Assistance Commission effective through February 24, 2017; 2020 General Election process issues involving electronic, algorithmic manipulation of election records with the human addition of paper ballots on the back-end.
Whistleblower X name withheld pending protective order/motion for permission to use pseudonym	Communications during 2020 General Election between and among Chief Information Security Officer/Secretary of State and Auditors regarding, <i>inter alia</i> , electronic changes to voting systems mid-2020 General Election.
Julie Wise Director of Elections 919 SW Grady Way Renton, WA 98057 206-477-4140	King County Elections procedures, physical and electronic security, Washington State Association of County Auditors, Counter-claims, Loose Zip Ties, Party Preference Tracking, Vote Tabulation, Audits, Certification, Investigations, Senate Bill 5459, Public Records Act Response, Public Records Act Penalties relating to all of the above.
Janice Case County Exec. Assistant 919 SW Grady Way Renton, WA 98057 206-477-4300	Knowledge of electronic voting system upgrades mid-2020 General Election; Washington State Association of County Auditors meetings, workgroups, chats; potential knowledge of election procedural issues relating to other causes of action.

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1 2 3 4 5 6	Margaret Brownell IT Manager III 919 SW Grady Way Renton, WA 98057 206-263-8936	Knowledge of King County Elections electronic voting systems; data transfer; potential knowledge of election procedural issues relating to other causes of action.
7 8 9 10 11	Steven Barron Program Supervisor I 919 SW Grady Way Renton, WA 98057 206-296-0310	Ballot collection and logistics supervision; potential knowledge of election procedural issues relating to other causes of action.
12 13 14 15 16	Jaclyn Adams Project Manager II 919 SW Grady Way Renton, WA 98057 206-263-2514	Public Disclosure Requests; penalties under the Public Records Act; records retention; potential knowledge of election procedural issues relating to other causes of action.
17 18 19 20 21 22	Derek Anderson WSACA P.O. Box 6104 Olympia, WA 98507 (360) 529-5628	Authentication of Washington State Association of County Auditors records, recordings, electronic communications, including Elections Committee Meetings, Public Disclosure Request Meetings, workgroups, chats.
23 24 25 26	Jerry Pettit 831 No. 6 Road Ellensburg, WA 98926 509-929-1591	Knowledge of electronic voting system problems during 2020 General Election; expressed appropriate concerns regarding upgrades to systems mid-2020 General Election shortly prior to certification.

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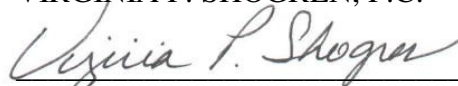
1 2 3 4	Justin Burns 7617 Alice SE Ct Olympia WA 98503 360-250-9020	Knowledge of electronic voting system problems during 2020 General Election, including the urgent need for pre-certification updates to servers in previous role as Chief Information Security Officer for the WA Secretary of State.
5 6 7 8	Bill Rowland 10305 139 th St Ct E D9 Puyallup, WA 98374 253-536-3322	Expert cyber-forensic witness opinions and related testimony regarding King County election systems; opinions subject to Defendants' cooperation in providing requested public records and in discovery.
9 10 11 12	Custodian of Election Records, King County, Identity TBD	King County Elections voting systems; server communications; the generation, transmission and storage of King County Elections electronic data and tabulation data for the 2020 General Election.

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14 The above list is non-exclusive. WEICU reserves all rights to the disclosure of additional witnesses, as Defendants have, to date, failed to produce records in response to written discovery requests.

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16 WEICU further reserves all rights to introduce additional documentary and audio-visual evidence at the time of trial.

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18 Respectfully submitted,

19 VIRGINIA P. SHOGREN, P.C.

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21 By: Virginia P. Shogren, Esq.

22 WSBA No. 33939

23 961 W. Oak Court

24 Sequim, WA 98382

25 360-461-5551

26 vshogren@gmail.com

27 Attorney for Plaintiff WEICU

28 Dated: May 22, 2023

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DECLARATION OF SERVICE

I hereby certify that on May 22, 2023, I electronically filed the following document with the Clerk of the Court using the King County Superior Court E-Filing System and caused a copy to be served upon the parties listed below via the method indicated:

PLAINTIFF WASHINGTON ELECTION INTEGRITY COALITION UNITED’S DISCLOSURE OF POSSIBLE PRIMARY WITNESSES

JOINDER IN PLAINTIFF WASHINGTON ELECTION INTEGRITY COALITION UNITED’S DISCLOSURE OF POSSIBLE PRIMARY WITNESSES

Counsel for Defendants Julie Wise, King County:

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Heath L. Hyatt

Via email: HHyatt@perkinscoie.com

And I hereby certify that I caused to be served the document via email provided by the following *pro se* plaintiffs:

Doug Basler

Timofey Samoylenko

Dated: May 22, 2023

s/ Virginia P. Shogren

Virginia P. Shogren

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