

**STATE OF MICHIGAN  
6<sup>th</sup> CIRCUIT COURT IN THE  
COUNTY OF OAKLAND**

**PEOPLE OF THE  
STATE OF MICHIGAN,**

Case No. 2023-285759-FH

Plaintiff,

Hon. JEFFERY S. MATIS

v.

**STEFANIE LAMBERT,**

Defendant.

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**PROSECUTING ATTORNEY**

Dale J. Hilson (P57726)  
Muskegon Prosecutor  
Attorney for the People  
990 Terrace Street, Fl. 5  
Muskegon, MI 49442  
(231) 724-6435

**HARTMAN LAW FIRM, PLC**

Daniel J. Hartman (P52632)  
Attorney for Defendant  
PO BOX 307  
Petoskey, MI 49770  
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**DEFENDANT'S SUPPLEMENTAL WITNESS LIST**

1. The defendant relies upon the production of all witnesses listed in the Prosecution list
2. All the witnesses listed in the February 20, 2024 list of witnesses previously filed in the present case on behalf of the defendant.
3. Diane Patterson
4. Chris Kachoureff, expert witness on property law, agency law, administrative law, constitutional law, separation of powers, criminal investigations, civil law, civil investigations and use of expert witnesses in civil matters, election related matters.
5. Sharon Olson
6. Carol Asher
7. Carrie Milburn
8. Sheryl Tussey
9. Katrina Spasic
10. David Moreno
11. Ronald Morales
12. Andy Huang
13. Juan Andres Donato Bautista

14. Roger Allejandro Pinate Martinez
15. Jorge Miguel Vasquez
16. Elie Moreno

### **Defendant's Exhibit List**

1. Any exhibit listed by the Prosecution and produced in the course of discovery including but not limited to reports, text messages, bank records, or other documentary or photographic evidence.
2. Documents from Antrim County including but not limited to orders, reports, interrogatories, transcripts and any other document, photo, exhibit or other item *William Bailey v Antrim County*, Case NO 2020-9238-CZ
3. The Antrim Lenberg Report containing the notary seal of Diane Patterson.
4. 2020 Michigan Election Code.
5. 2020 Michigan Administrative Rules Department of State.
6. Press release Letter June 25, 2021 Daire Rendon.
7. Recordings and Transcript of Meeting with AG staff including Eric Grill (opposing counsel in Ms. Lambert and Deperno litigation) and State Troopers detailing the need to "find a crime" even if a legal act that can be said in a illegal manner and charge in Oakland County to avoid northern court and jury. The recording details knowledge of the exact reports filed by opposing counsel in civil litigation and piercing attorney client privilege with retained experts and investigators for the opposing litigation without knowing if they have legal authority to do so because they don't know contract or constitutional law.
8. Documents establishing the conflict of interest of AG and appointment of Special Counsel including but not limited to press releases, written documents, court filings
9. All emails disclosed on February 12, 2024 approximately 34 emails containing 54 items more or less which the Special Prosecutor refers to in the Motion *in Limine*.
10. Grand jury transcripts.
11. Grand jury exhibits.
12. 2022 AG Videos and Literature.
13. All Press releases by the Special Prosecutor, Secretary of State, and Attorney General related to the present case or Ms. Lambert and/or her co-defendant's.
14. All documents, statements and other policy positions documents of the Michigan Secretary of State and/or AG related to the 2020 election and the efforts to silence, intimidate, label as misinformation and discredit any investigation as to the reliability of the election results.
15. All documentary evidence related to the Muskegon Registration Investigation that was buried by DJ Hilson and the Attorney General related to the 2020 election.

Dated: 9/30/2024

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Daniel J. Hartman (P52632)