

**DISTRICT OF COLUMBIA
COURT OF APPEALS
BOARD ON PROFESSIONAL RESPONSIBILITY
AD HOC HEARING COMMITTEE**



In the Matter of Rudolph W. Giuliani, Esq.
Bar No.: 237255

Respondent,

A Temporarily Suspended Member of the Bar
of the District of Columbia Court of Appeals.

Admitted: December 2, 1976

BDN: 22-BD-027

DDN: 2020-D253

WITNESSES FOR RESPONDENT

As directed by the Chair in his order of September 1, 2022, Respondent's Counsel submits this list of the witnesses that counsel intends to call on behalf of Respondent. It is believed that they will testify as indicated.

1. Rudolph W. Giuliani will testify that he had a reasonable basis to make the arguments that he made on behalf of his client then President Trump in the Pennsylvania litigation.
2. Christina Bobb, Esq. will testify that through her investigative work she spoke to people who witnessed voting irregularities and allegations of fraud.
3. Pam Bondi, Esq. former Attorney General of the State of Florida will testify that she was on the ground in Pennsylvania and witnessed in Philadelphia the exclusion of Republican inspectors and poll watchers including herself from inspecting any ballots.
4. Katherine Friess, Esq. will testify that she was a senior Republican inspector and observed in Pittsburgh the exclusion of Republican inspectors and poll watchers and conveyed to Respondent numerous allegations of fraud.
5. Julie Levin, Esq. will testify that she assisted in assembling Respondent's legal team and was aware of pressures and stresses placed on

the attorneys in the attempt to deter them from assisting in the representation of then President Trump.

6. Colonel Phil Waldron will testify as to the methods that were employed by staff to analyze the nature of the irregularities and alleged voting illegalities.

7. Dr. Shiva Ayyadurai will testify as to the statistical analysis as to voting results.

8. Corey Lewandowski will testify that he was on the ground in Pennsylvania and in Philadelphia he witnessed the exclusion of Republican inspectors and poll watchers including himself from inspecting any ballots.

9. Peter Navarro will testify as to his extensive analysis of voting irregularities and alleged illegalities.

10. Russell Ramsland will testify as to statistical analyses of the then available voting records.

11. Douglas Mastriano will testify as to the gathering of evidence of voting irregularities and alleged illegalities and arranged for and presided over the Gettysburg hearing.

12. Michael Roman will testify that as the chief investigator in Pennsylvania for the Trump campaign he conveyed to Respondent incidents of voter irregularities and allegations of fraud.

13. Joann Miller will testify that she assisted Peter Navarro in gathering information for his reports and conveying information to Respondent's staff.

14. John Droz, Jr. will testify as to his report on irregularities and improprieties in the Pennsylvania election which was conveyed to Respondent at the time of the Pennsylvania litigation.

15. Jenna Ellis, Esq. will, testify that she was the number two lawyer on the then President Trump's Pennsylvania litigation team.

16. Jeremy Mercer, Esq. will testify that he was in charge of numerous Republican inspectors and poll watchers who were excluded from inspecting ballots.

17. Bernard Kerik will testify that he was one of the chief investigators into the irregularities and allegations of fraud in the Pennsylvania Presidential election and in the subject litigation.



Hon. John M. Leventhal (Ret.)
Partner
Aidala, Bertuna & Kamins PC
546 Fifth Avenue - Sixth Floor
New York, New York 10036
(212) 486-0011 / (212) 750-9700



Hon. Barry Kamins (Ret.)
Partner
Aidala, Bertuna & Kamins PC
546 Fifth Avenue - Sixth Floor
New York, New York 10036
(212) 486-0011 / (212) 750-9700