

COURT OF COMMON PLEAS
CUYAHOGHA COUNTY, OHIO

STATE OF OHIO)
)
 PLAINTIFF)
)
 Vs.)
)
 MARTIN E. YAVORCIK) **Witness/ Document List**
)
 DEFENDANT)

Now comes the Defendant, Martin E. Yavorcik, through undersigned counsel, and gives notice of the following witnesses and documents which may be presented at the trial of the case.

POTENTIAL WITNESS LIST

1. Atty. Linette Stratford
2. Atty. Paul Gains
3. Atty. Tim Tusic
4. Atty. Alan Kretzer
5. Atty. Michael Scortino
6. Atty. John McNally
7. Lisa Antonini
8. John Reardon
9. Anthony Cafaro, Sr.
10. J.J. Cafaro
11. Atty. Richard Goldberg
12. Flora Cafaro
13. Harry Strabala
14. Leo Jennings
15. Khaled Tabarra
16. Atty. Michael Morley
17. Mark Monroe
18. Tom McCabe
19. Joyce Kale-Pesta
20. Robert Wasko
21. Ron Gerberry

- 22.Kurt Welsh
- 23.Jeff Sadlak
- 24.Atty. Robert Duffrin
- 25.Atty. Paul Nick
- 26.Atty. Dennis Will
- 27.Atty. Timothy Franken
- 28.Atty. Steven M. Dettelbach
- 29.David Skolnick
- 30.Louie Free [A.K.A. Vincent Walk]
- 31.Bertram De Souza
- 32.At this time unknown bloggers on *Vindy.com*
- 33.All witnesses not above mentioned on the States witness list

POTENTIAL DOCUMENTS

1. All campaign checks received
2. All campaign filings
3. 2008 tax return and amended returns
4. All recorded conversations of Martin Yavorcik
5. All recorded conversations of anybody discussing Martin Yavorcik
6. All recorded conversations of anybody discussing Yavorcik for Prosecutor
7. Yavorcik's Bankruptcy Documents
8. Photograph of Glenwood Avenue Home
9. Photograph of Yavorcik's Law Office
- 10.All *Vindicator* articles on the Oakhill investigation and two subsequent cases
11. All *Vindy.com* blog posts by as yet unknown individuals
- 12.U.S. Department of Justice Elections Crime Manual
- 13.United States Attorney Manual
- 14.U.S. Department of Justice regulations confidential informants

**** Any and all additional individuals and information as it becomes available to the Defense ****

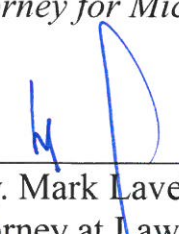
Respectfully Submitted,



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Attorney for Defendant

CERTIFICATE OF SERVICE

A copy of the foregoing has been served via electronic mail on this 30th day of NOVEMBER to: Office of Prosecuting Attorney Daniel C. Kasaris, 615 W. Superior Avenue, 11th Floor, Cleveland, Ohio 44113, Cuyahoga County Prosecuting Attorney, Timothy McGinty, 615 W. Superior Avenue, 11th Floor, Cleveland, Ohio 44113, Attorney Lynn Maro, 7081 West Blvd., Ste. 4, Youngstown, Ohio 44512, *Attorney for John McNally*, and Attorney John Juhasz, 7081 West Blvd., Ste. 4, Youngstown, Ohio 44512, *Attorney for Michael Sciortino*.



Atty. Mark Lavelle (#0061904)
Attorney at Law, LLC
Attorney for Defendant