## STATE OF VERMONT PROFESSIONAL RESPONSIBILITY BOARD

## PRB-124-2022, PRB-076-2023

In re: W. MICHAEL NAWRATH

## **RESPONDENT'S WITNESS DISCLOSURES**

NOW COMES the Respondent, W. Michael Nawrath, pursuant to A.O. 9, Rule 19.B(1), and hereby submits the following names and addresses of all persons who may have relevant facts or knowledge of the above-captioned matters.

- All witnesses disclosed in Special Disciplinary Counsel's *List of Witnesses*, served on December 7, 2023.
- 2. John Benson, current address unknown, phone number 802-366-0606.
- 3. Donna Benson, current address unknown, phone number 802-366-0606.
- 4. Brian Benson, current address unknown (spend January and February in Florida, rest of time in Vermont), phone number 964-415-2479.
- 5. Susan Benson, current address unknown (spend January and February in Florida, rest of time in Vermont), phone number 964-415-2479.
- 6. Susan Benson, current address unknown (lives in Syracuse, NY area), phone number 954-683-1175.
- 7. Mary Benson Herba, current address unknown (lives in Syracuse, NY area), phone number 315-440-4786.

This disclosure will be updated if and when addresses are known to Respondent.

Respectfully submitted this 8th day of December 2023.

Dated: December 8, 2023

Alexander M. Dean, Esq.

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adean@barrsternberg.comCounsel for Respondent,W. Michael Nawrath.