U.S. Department of Justice

Enron Task Force

515 Rusk Avenue
Room 12140
Houston, Texas 77002

January 6, 2006

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Houston, Texas 77019

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Houston, Texas 77007

Re: *Production of Government's Updated Witness List*

Counsel:

Attached hereto is a copy of our revised witness list in compliance with the Court's instructions on December 28, 2005. Please note that we have removed the following names from the list that we produced to you on December 15, 2005:

Carl Bass
Eric Boyt
Chris Calger
Ron Coker
Mike Jones
Patti Klien
Dana Lee
Lindsay Long
Sean Long
Jesus Melendrez
Deborah Perotta
Jennifer Riley
Cassandra Schultz
Chris Sherman
Ryan Synnott
Joyce Tang
Warren White

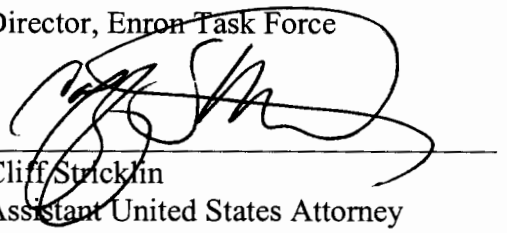
In addition, you will find that the follow witnesses have been added to our list:

Karen Choyce
Joanne Cortez
Ed Kosmicki
David Port

This list represents our view of the case at this time. We may need to supplement the list as the trial approaches and we reserve the right to do so.

Sincerely,

SEAN M. BERKOWITZ
Director, Enron Task Force



Cliff Stricklin
Assistant United States Attorney
Enron Task Force

cc: The Honorable Sim Lake
United States District Court
Southern District of Texas
Houston, Texas 77002

att.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES of AMERICA	§	
	§	
-vs.-	§	Crim. No. H-04-25 (S-2)
	§	
JEFFREY K. SKILLING and	§	
KENNETH LAY,	§	
	§	
Defendants	§	

GOVERNMENT'S REVISED WITNESS LIST
JANUARY 6, 2006

Christopher Abel
Vincent Anzalone
Ron Barone
Tom Bauer
John Beard
Tim Belden
Don Black
Norman Blake
Pam Butler
Karen Choyce
Wesley Colwell
Joanne Cortez
Wanda Curry
Katherine Dalton
Charles Davidow
David Delainey
John Diaz
John Duncan
Andrew Fastow
Stephanie Anderson Forest
Ben Glisan
Kevin Hannon
Keith Harris
Julie Haviland
Stan Horton
Wincenty Kaminski
Carolyn Kee
Kelly Kimberly
Mark Koenig
Chris Loehr
Amanda Martin
Sheila McNulty
Peter Melley
Mike Muckleroy
Eric Mullins
John Nelson
Mark A. Palmer
Sarah Palmer
David Port
Dale Rasmussen
Glenn Ray
Andrea Reed
Ken Rice
Paula Rieker
Richard Sanders
John Schreiber
Stephen Schwarzbach
Jim Schwieger
Marc Shapiro
Peter K. Shonerd
John Sides
Ryan Siurek
Rebecca Smith
John Stewart
John R. Sult
Terrance Thorne
Sherron Watkins
Terry West
Sidonia Wilson
David Woytek
Howard Zall

ENTITIES FROM WHICH THE GOVERNMENT MAY BE CALLING CUSTODIANS:

Arthur Anderson
Bank of America
Barclays
Bloomberg
Charles Schwab
CIBC
Citicorp
Credit Suisse First Boston
Deloitte & Touche
Dynegy
Enron
Goldman Sachs
Harrier I LLC
Innovision
Janus
J.P. Morgan-Chase
Ed Kosmicki
Luntz Research
Merrill Lynch
PaineWebber
Southwest Bank
Thomson Financial
Wessex
Wilmington Trust

SUMMARY WITNESSES:

Special Agent, IRS
Special Agent, FBI