

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA

v.

DONALD JOHN TRUMP,
RUDOLPH WILLIAM LOUIS GIULIANI,
JOHN CHARLES EASTMAN,
MARK RANDALL MEADOWS,
KENNETH JOHN CHESEBRO,
JEFFREY BOSSERT CLARK,
JENNA LYNN ELLIS,
RAY STALLINGS SMITH III,
ROBERT DAVID CHEELEY,
MICHAEL A. ROMAN,
DAVID JAMES SHAFER,
SHAWN MICAH TRESHER STILL,
STEPHEN CLIFFGARD LEE,
HARRISON WILLIAM PRESCOTT FLOYD,
TREVIAN C. KUTTI,
SIDNEY KATHERINE POWELL,
CATHLEEN ALSTON LATHAM,
SCOTT GRAHAM HALL,
MISTY HAMPTON a/k/a EMILY MISTY HAYES
Defendants.

CASE NO.

23SC188947

STATE'S DEMAND FOR DISCOVERY UNDER O.C.G.A. § 17-16-1 ET SEQ.
AND STATE'S DEMAND FOR WRITTEN NOTICE OF
DEFENDANTS' INTENTION TO OFFER ALIBI DEFENSE

COMES NOW the State of Georgia, by and through Fulton County District Attorney Fani T. Willis, and demands pursuant to O.C.G.A. § 17-16-1 et seq. that the Defendants in this matter produce the following to the State of Georgia:

- 1) Discovery of all photograph books, papers, documents, photographs, tangible objects, audio and visual tapes, films and recordings, or copies or portions thereof and of buildings or places, which are within the possession, custody, or control of the Defendants and which the Defendants intends to introduce as evidence in the defense's case-in-chief or rebuttal at trial, pursuant to O.C.G.A. § 17-16-4(b)(1);

- 2) Discovery of all reports of any physical or mental examinations and of scientific tests or experiments, including a summary of the basis for the expert opinion rendered in the report, or copies thereof, if the Defendants intend to introduce in evidence in the defense's case-in-chief or rebuttal the results of the physical or mental examination or scientific test or experiment, and if the report is oral or partially oral, a reduction to writing of all relevant and material oral portions of such report, pursuant to O.C.G.A. § 17-16-4(b)(2);
- 3) Discovery of all statements of any witness that is in the possession, custody, or control of the Defendants or the Defendants' counsel that relates to the subject matter concerning the testimony of the witness that the Defendants intend to call as a witness at trial, pursuant to O.C.G.A. § 17-16-7;
- 4) The names, current locations, dates of birth, and telephone numbers of all witnesses for the Defendants, pursuant to O.C.G.A. § 17-16-8;
- 5) Written notice of the Defendants' intention to offer a defense of alibi, including the specific places at which the Defendants claim to have been at the time of the offenses and the name, addresses, dates of birth, and telephone numbers of the witnesses upon whom the Defendants intend to rely to establish such alibi, pursuant to O.C.G.A. § 17-16-5;

Further, the State of Georgia requests that counsel for Defendants continue to supplement all information in relation to the above prior to trial, as required by law.


Respectfully submitted this 20th day of September 2023,

FANI T. WILLIS
District Attorney
Atlanta Judicial Circuit

/s/ F. McDonald Wakeford
F. McDonald Wakeford
Georgia Bar No. 414898
Chief Senior Assistant District Attorney
Fulton County District Attorney's Office
136 Pryor Street SW, 3rd Floor
Atlanta, Georgia 30303

/s/ John W. "Will" Wooten
John W. "Will" Wooten
Georgia Bar No. 410684
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136 Pryor Street SW, 3rd Floor
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this STATE'S DEMAND FOR DISCOVERY UNDER O.C.G.A. § 17-16-1 ET SEQ. AND STATE'S DEMAND FOR WRITTEN NOTICE OF DEFENDANTS' INTENTION TO OFFER ALIBI DEFENSE, upon all counsel who have entered appearances as counsel of record in this matter via the Fulton County e-filing system.

This 20th day of September 2023,


FANI T. WILLIS
District Attorney
Atlanta Judicial Circuit

/s/ F. McDonald Wakeford

F. McDonald Wakeford

Georgia Bar No. 414898

Chief Senior Assistant District Attorney
Fulton County District Attorney's Office
136 Pryor Street SW, 3rd Floor
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/s/ John W. "Will" Wooten

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