

1 IN THE SUPERIOR COURT OF FULTON COUNTY

2 STATE OF GEORGIA



3  
4 IN RE: )

5 SPECIAL PURPOSE GRAND JURY )

6 ) CASE NUMBER: 2022-EX-00024

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8 2022-EX-00024

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10 SPECIAL PURPOSE GRAND JURY MOTIONS TRANSCRIPT

11 Before the HONORABLE JUDGE ROBERT C.I MCBURNEY

12 on July 25, 2022, Atlanta, GA 30303

13  
14 APPEARANCES:

15 FOR THE STATE: ADA NATHAN WADE

16 FOR THE STATE: ADA DONALD WAKEFORD

17 FOR THE STATE: ATTORNEY ANNA GREEN-CROSS

18 FOR SENATOR JONES: BILL DILLON & ANNA CLAPP

19 FOR THE JURORS: ATTORNEYS MS. PEARSON & MS. DEBORROUGH

20  
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We've got a lot of lawyers here, so I want to make sure we get on the record who is here and who will be speaking for the different parties. Before we go any further, though, Rule 22 wise. There were some media outlets that only reached out today to get the green light. If you were able to get equipment in here you are

1 free to use it, but I did not sign your Rule 22 today,  
2 because the general Rule 22 is to be signed 24 hours in  
3 advance, but you really only need the Rule 22 for purposes  
4 of getting in the building with the big cameras, so if you  
5 sought Rule 22 approval to record things while you're in  
6 here and you've got a handheld device, you are welcome to  
7 do that.

8           Going forward it's 24 hours in advance, and it would  
9 really help if you could report back to your Rule 22  
10 people, if you would designate more clearly on the Rule 22  
11 forms what kind of equipment you want to bring in. I am  
12 all for having a pool feed rather than four big cameras in  
13 here. It gets a little crowded for you all, but I can't  
14 tell because everyone who submits a Rule 22 checks  
15 everything -- I want to bring in every kind of equipment  
16 in. I'm bringing in a drone. I know you're not bringing  
17 in a drone, but apparently for everyone bringing in the  
18 big cameras we only need one, and like I said, I'm happy  
19 to have a pool, but it's hard to tell.

20           With that, let's start with the State. Who will be  
21 handling -- it can be more than one person, but I just  
22 don't want to omit anyone if I'm looking to the District  
23 Attorney's Office for answers or responses to concerns  
24 raised by some of these witnesses. Who from the DA's  
25 office or affiliated from the DA's office should I be

1 expected to hear from?

2 ATTORNEY GREEN-CROSS: Good afternoon, Your Honor,  
3 I'm Anna Green-Cross. I'm here representing the District  
4 Attorney's office on the motion to disqualify prosecutors.

5 THE COURT: So if I have questions about quashal or  
6 assertion of Fifth Amendment rights?

7 ADA WADE: Good afternoon, Judge. I'm Nathan Wade,  
8 special prosecutor from the District Attorney's office as  
9 well as Donald Wakeford.

10 THE COURT: So Wade and Wakeford for Fifth Amendment  
11 quashal and Green-Cross for the disqualification.

12 ATTORNEY GREEN-CROSS: Yes.

13 THE COURT: Okay, got it. Thank you. All right. If  
14 we pivot over to potential witnesses and counsel, Mr.  
15 Dillon, good morning. How are you?

16 ATTORNEY DILLON: Good afternoon. I'm fine, Judge.

17 THE COURT: You are representing Senator Jones. Is  
18 there anyone else? I don't want to ignore anyone.

19 ATTORNEY DILLON: My associate Anna Clapp is also  
20 here.

21 THE COURT: Great. Okay. Clapp as in applause or  
22 Platt as in . . .

23 ATTORNEY CLAPP: Clapp as in applause, two P's.

24 THE COURT: Got it. Excellent, and then on behalf of  
25 the 11 alternate electors, Ms. Pearson and Ms. Deborroughs

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1 I see Ms. Deborroughs virtually. She is appearing in  
2 Newnan or even further away, but we greenlighted that  
3 virtual appearance. It's fine, and we've got Ms. Pearson  
4 here.

5 ATTORNEY PEARSON: You do, Your Honor.

6 THE COURT: Okay. Anyone else on behalf of your  
7 clients or just the two of you?

8 ATTORNEY PEARSON: No, Your Honor, just us.

9 THE COURT: All right. I want to start with a  
10 question for either Mr. Dillon or Ms. Clapp, and that is  
11 whether you are joining in the motion that Ms. Pearson  
12 filed in which Fifth Amendment concerns are raised as  
13 opposed to conflict issues?

14 ATTORNEY DILLON: Yes, Your Honor. Insofar as Ms.  
15 Pearson's motion, I believe at page 7. It raises the fact  
16 that these witnesses who have received both subpoenas and  
17 target letters should have their appearances waived. We  
18 join in that portion of her motion.

19 THE COURT: What is the status of your client? I  
20 know he's received the subpoena, that is the only part  
21 that's been disclosed to me.

22 ATTORNEY DILLON: Well, in the government's response  
23 to our motion, they actually point out that Senator Jones  
24 received a target letter in this case.

25 THE COURT: Okay. Do you disagree with that or . . .

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1           ATTORNEY DILLON: No, I do not. It is an irrefutable  
2 fact at this point. We publicly acknowledge that it is an  
3 irrefutable fact.

4           THE COURT: Okay, so my thought is that we talk about  
5 some of the Fifth Amendment concerns first because it may  
6 make moot for practical purposes the conflict concerns  
7 that you raise in your motion. Let me simplify my thought  
8 process for you. If in the end I determine that Senator  
9 Jones need not appear because of Fifth Amendment reasons,  
10 I don't know we need to reach the question of  
11 disqualification if that would be his only connection to  
12 this grand jury.

13           This Grand Jury is not a Grand Jury that would be  
14 voting on a bill of indictment. It is a Grand Jury that  
15 has been tasked with generating a report that would  
16 contain in it, ideally, a recommendation to the District  
17 Attorney as to whether she should pursue charges or not  
18 and what those charges might look like, and any other  
19 things that that Grand Jury wants to put in there other  
20 than a true bill.

21           So the way the Fifth Amendment analysis plays out is  
22 that I conclude that Senator Jones doesn't need to appear,  
23 if they state his name or something, and we can work  
24 through those logistics probably in a smaller group  
25 setting. Do you agree that we don't need to reach the

1 question of disqualification?

2 ATTORNEY DILLON: No, Your Honor. I do disagree.

3 THE COURT: Okay.

4 ATTORNEY DILLON: I think that the disqualification  
5 issue is right, and I think that it has been exacerbated  
6 by the media circus that's been generated out of the  
7 Fulton County's DA's office in this case, and that the  
8 harm to my client, Senator Jones, is that he's being drug  
9 through the mud publicly as a subject of this special  
10 Grand Jury.

11 THE COURT: Well, apparently as a target, not a  
12 subject.

13 ATTORNEY DILLON: Well, I say a subject as someone  
14 who has been affected by this special Grand Jury,  
15 particularly as a target, but with the effort and focus  
16 being that it's going to have an impact on the Lieutenant  
17 Governor's race this fall. And so if the DA's office has  
18 a hand in it and they issue a report that says, Well,  
19 we're going to recommend an indictment of Senator Jones,  
20 it will have a direct impact on the election in November,  
21 and that's been reported in the media numerous times.

22 THE COURT: Okay. So I'll correct a couple of things  
23 for you. One, and I may have misunderstood what you were  
24 saying, but the District Attorney's Office is not offering  
25 any report. That would come from the grand jurors as

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1 supervised by me. I appreciate that the District Attorney  
2 has fashioned herself as the legal adviser to the Grand  
3 Jury, and that's an adaptation of the actual language of  
4 the role that that office plays, but ultimately it's the  
5 Grand Jury's report not the District Attorney's.

6 Second, and a concern we do need to cover today,  
7 regardless of how we approach the disqualification piece  
8 would be the timing of the release of the report. Now, I  
9 think that's something that everyone ought to leave here  
10 today with a better understanding of how that will be  
11 managed.

12 That is within my purview, and it was helpful to have  
13 it brought to my attention that timelines could collide,  
14 that the Grand Jury might complete Its work in October,  
15 and that might not be the best time for Its work product  
16 to be shared publicly in the way that many investigative  
17 agencies, that's what the Grand Jury is an effect here,  
18 they hold off on taking certain steps until an election  
19 has passed with a few exceptions, and we need to see  
20 what's going on with that report, if it's even ready by  
21 then.

22 The Grand Jury is authorized to continue its work  
23 through May 1 of next year, so I don't know that it's  
24 right yet to worry about that other than to get a general  
25 understanding that I wouldn't be a big fan of an October



1 surprise, so if we talk about when reports would be  
2 released and we work through a Fifth Amendment analysis,  
3 if that Fifth Amendment analysis is, in light of a target  
4 letter, et. cetera, Senator Jones probably doesn't need to  
5 -- and it's not my analysis yet, but if the end result of  
6 that is that Senator Jones does not need to appear before  
7 the Grand Jury, that it strikes me that the  
8 disqualification piece is moot.

9 I don't know from what the office would be  
10 disqualified if Senator Jones isn't being asked to do  
11 anything between now and the release of the report other  
12 than the timing of the report, which doesn't necessarily  
13 tie into who is investigating. If we were suddenly to  
14 switch to the Lowndes County District Attorney's Office,  
15 and they finished their work with the Grand Jury in  
16 October, we'd be faced with that same chronological  
17 challenge.

18 ATTORNEY DILLON: We would, Your Honor, with the  
19 exception of the issue that has to do with the press, and  
20 the issue that has to do with the public favoring of my  
21 client's opponent for Lieutenant Governor, Charlie Bailey,  
22 and the the District Attorney in this case has raised  
23 \$32,000 for Charlie Bailey in the headliner that she  
24 hosted for him in June. Shortly thereafter, she issued my  
25 client a target letter and then shortly after that, in

1 fact, two days ago when they filed their brief, that was  
2 the first time that it was publicly known that Senator  
3 Jones was a target of this Grand Jury investigation, so on  
4 one side we have a public target, and on the other side we  
5 have a headliner fundraiser raising \$32,000, and we  
6 contend that those two things create the appearance of  
7 impropriety, that under the Rules of Ethics in the state  
8 of Georgia this is prohibited conduct, and then with  
9 regard to Senator Jones this investigation in Fulton  
10 County should be complete at this point, that this  
11 District Attorney's Office needs to be disqualified, and  
12 perhaps some other district attorney can be appointed, and  
13 in that case, Senator Jones would would be glad to  
14 cooperate with that investigation, because he has  
15 indicated and indicated early on that he was willing to  
16 cooperate and give a statement and meet with their  
17 investigators, and then two weeks later he gets a target  
18 letter, and then six days after he gets that target  
19 letter, and 'm getting ahead of myself.

20 THE COURT: Yes, you are. In fact, I'm going to cut  
21 you off, because I simply wanted to know whether you  
22 thought it was moot and you do not think it is.

23 ATTORNEY DILLON: I do not think it is, Your Honor.  
24 I think it is right at this point.

25 THE COURT: Okay, and we may get to it. I was  
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1        expecting a different answer, but I appreciate your  
2        answer. I still think we need to start with the Fifth  
3        Amendment concerns that were brought to a head in  
4        Ms. Peterson's motion, but what I want to do is start with  
5        the State on that because your perspective with the  
6        District Attorney's Office on that, because your  
7        perspective may help me better navigate what to do, and  
8        for folks in the room here representatives of the District  
9        Attorney's Office and a lawyer for another witness, that  
10       witness and I have already had some basic discussions  
11       about how we might work through the assertion of Fifth  
12       Amendment privilege in certain context, and so we will  
13       probably build on that.

14                So if I'm referring to what we talked about  
15       yesterday, that is what I mean in connection with that  
16       situation. Mr. Wade or Mr. Wakeford, what I would like to  
17       hear from you on is is your overarching reaction to  
18       Ms. Deborroughs and Ms. Pearson's motion as we discussed in  
19       the past. I don't know that there is a blanket, I don't  
20       have to answer any questions that would work here, but  
21       insofar as their 11 client's sole connection to the  
22       investigation is their participation in the alternate  
23       electors scheme, and that was going to be the focus of  
24       99 percent of your questions, if that is determined to be  
25       in light of some of the target news that's been shared,

1 something that is protected that they don't need to  
2 respond to. I'm not sure what the point would be in  
3 bringing those folks in on a non-immunized status before  
4 the Grand Jury, so help me work through that, please.

5 ADA WAKEFORD: Yes, Your Honor. I would begin by  
6 pointing, Your Honor, to the case of State v. Lampl, that  
7 is spelled L-A-M-P-L. Your Honor, may be aware of this  
8 case.

9 THE COURT: Is that Clayton County -- yes?

10 ADA WAKEFORD: I believe, I'm not sure of the  
11 jurisdiction that it began, but it speaks very poignantly  
12 to this issue. Specifically what it says is, that "Under  
13 Georgia law, the designation as a target without a formal  
14 charge being leveled against an individual doesn't change  
15 the ability to subpoena someone to appear before a special  
16 purpose Grand Jury."

17 THE COURT: Fair point, and a footnote may have been  
18 dropped somewhere with something that was provided, but  
19 that was not my question. I don't think the word target  
20 is as magical in State proceedings as it is in Federal  
21 proceedings, but it certainly has caused the temperature  
22 in the room to go up and antennas to go up everywhere, and  
23 so whether you you call him target or you call him less of  
24 a friend, we now have witnesses who are saying, "I'm not  
25 comfortable answering those questions, I think I may be

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1 facing criminal liability."

2 In other words, I assert my Fifth Amendment privilege  
3 or protection, whatever you want to call it, and that's  
4 what Ms. Pearson and Ms. Deborrough have done on behalf of  
5 their 11 clients, so my question isn't doesn't target mean  
6 you can't go any further. You may want to think through  
7 in the future labeling someone that and then hailing them  
8 in because of how this is played out.

9 Let's just stick to the topics. If my sole  
10 connection to the investigation that you are conducting  
11 with this Grand Jury is that I was one of the people who  
12 agreed or was nominated, or however it happened to be an  
13 alternate elector, you're going to ask me about that, and  
14 I have a good-faith basis to believe my decision to agree  
15 to be an alternate elector exposes me to potential  
16 criminal liability, why shouldn't I be able to say I'm not  
17 answering any of those questions in the context of a Grand  
18 Jury?

19 ADA WAKEFORD: I understand, Your Honor. Thank you  
20 for the clarification. I would say that the 11  
21 individuals identified in the motion are not all situated  
22 in exactly the same place, so there may be commonality  
23 between them, but there is going to need to be an  
24 individual determination with regard to each of them. The  
25 level of involvement is necessarily individual, so what I

1 think would work is for an individual assessment to be  
2 made in each case, since we undoubtedly have the ability  
3 under the law under Lampl to ask the witnesses to appear,  
4 then there would be ahead of time a discussion between the  
5 parties with Your Honor's involvement need be, to discuss  
6 areas of inquiry that may lead to an identification of  
7 Fifth Amendment rights.

8 If that is the case, I believe we would be able to  
9 work out a procedure where there is not a badgering of a  
10 witness, but simply an ability for the special purpose  
11 Grand Jury to walk up to an area of inquiry and be told  
12 this is going to be foreclosed by the Fifth Amendment and  
13 move on if there are other areas to pursue, so each them  
14 will require, I believe an individual assessment.

15 THE COURT: Are there any of the 11 - - I'm gonna  
16 make it 12. I'm going to include Senator Jones in the  
17 group, so any of those 12 where the only topic of interest  
18 is that witness's participation in the alternate elector  
19 scheme.

20 ADA WAKEFORD: The answer to that is no.

21 THE COURT: Every one of them - - it sounds like it's  
22 a very diverse group, and one of the concerns Ms.  
23 Deborrough and Ms. Pearson had brought up was that some of  
24 them are remote, some of them have trouble with mobility,  
25 but you are saying all of them have some other potential

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1 connection to the investigation or area of interest to the  
2 investigation.

3 ADA WAKEFORD: Standing in my place right now, Your  
4 Honor, this is an investigative Grand Jury, so we're not  
5 at the stage, you know approaching, say a trial, where I  
6 can give a statement with the definiteness that you might  
7 be seeking. What I can tell you is, right now, can I say  
8 unless there's only one thing that we can connect one of  
9 these people to, then no, Your Honor.

10 THE COURT: Okay, so just to flip it around to the  
11 type of questions asked, you envision, or you and your  
12 colleagues envision asking each of the 12, including  
13 Senator Jones, questions beyond simply why did you decide  
14 to be an alternate elector? Tell me more about that.  
15 There are other aspects of the 2020 general election that  
16 you would be asking each of the 12 about. Mr. Wade.

17 ADA WADE: Yes, sir, Judge. If I may, much like the  
18 witness on yesterday, we have planned categories to touch,  
19 and we understand per the Court's instruction, if we can  
20 narrow down these buckets, ask the general question about  
21 that particular bucket, let the witness assert, at that  
22 point ask the witness if they plan to assert their Fifth  
23 Amendment privilege to any question concerning that issue,  
24 once they say yes, we move on.

25 THE COURT: Sure.

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1           ADA WADE: Not a barrage of like 50 questions where  
2 they decide to assert, but just to be able to hit the  
3 different buckets though and to answer the Court's  
4 question directly, that, yes, sir, there are other areas  
5 that we plan to attack.

6           THE COURT: There's more than one bucket for each of  
7 the 12 - -

8           ADA WADE: Yes, sir.

9           THE COURT: -- Is what I'm hearing you say - - well,  
10 then we would need to work through that. That helps, I  
11 appreciate that, and I think there is ample case law,  
12 state and federal, that authorizes witnesses who say up  
13 front that I'm going to assert the Fifth Amendment to  
14 still be called before the Grand Jury to then assert it.

15           Bank of Nova Scotia from the US Supreme Court is the  
16 earliest one I found where you sometimes need to have  
17 those people get in front of the Grand Jury to actually  
18 invoke, because they might not when put in that situation,  
19 and then the investigators are not forced to rely on a  
20 claim that they will, or to your point, Mr. Wakeford and  
21 Mr. Wade, there may be areas that come up that aren't  
22 properly covered by that protection.

23           I know we've been bouncing around a lot, but I think  
24 it makes sense for me to hear now from Ms. Pearson or Ms.  
25 Deborrough about the approach you've taken, which is my

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1 client shouldn't have to come in at all, and you may not  
2 yet have been able to speak with Mr. Wade and his team to  
3 know about these other buckets, to use his terms, but I  
4 will just share with you in working with Mr. Wade and his  
5 team yesterday and a different witness and lawyer, there  
6 are other areas, they may be minor, but they're still  
7 areas where even the lawyer agreed that my client doesn't  
8 have the Fifth Amendment right not to say, this is my job.

9 I've had this job for 10 years, and then they move on  
10 to what did you have to do with the electors scheme Fifth  
11 Amendment, and then they stop. They don't go any further  
12 with that topic, but to the District Attorney's offices  
13 point it's a broad waterfront, and you have seized upon  
14 maybe the big bright lighthouse, vis-a-vis your client's,  
15 but there could be some (unintelligible) buildings at that  
16 that lighthouse that it's appropriate for questions to be  
17 asked and more importantly answered.

18 So tell me why you think that instead the answers  
19 should be, and I mean you, go to the extreme, it's  
20 quashed, they shouldn't even have to show up to give  
21 (unintelligible)

22 ATTORNEY PEARSON: Correct, Your Honor. I think the  
23 first place to start is, just to correct a few things or  
24 to clarify a few things, from my understanding of what you  
25 just said, all of my clients are identically situated from

1 a legal perspective. They were all witnesses, they were  
2 all converted to targets, and there has been no  
3 differentiation from the DA's office between that.

4 THE COURT: Let me interrupt you for a second. So,  
5 you are saying all 11 of them have received target letters  
6 or some communication from the District Attorney's Office  
7 that uses the "T" word?

8 ATTORNEY PEARSON: Yes.

9 THE COURT: Whatever that may mean in the State  
10 context, but just because two of your clients have, you  
11 are saying they are similarly situated, it's just a matter  
12 of time for the postman to get there.

13 ATTORNEY PEARSON: I have 11 target letters.

14 THE COURT: Okay. So in that way they are similarly  
15 situated, but it sounds like they are, and you note it in  
16 your own motion, they are also very differently situated.  
17 You have, and I apologize if I have the title wrong, Mr.  
18 Schaffer as the chair of the Republican Party in Georgia,  
19 A very, very, different role in connection with the  
20 affairs of election then. I don't remember who the  
21 elderly individual difficulty with mobility and whatnot.  
22 I've never heard of the person.

23 It is a differently situated individual once you get  
24 outside of that lighthouse of, I was an alternate elector.

25 ATTORNEY PEARSON: That's true, Your Honor, but I  
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1 don't know what situation you dealt with yesterday or what  
2 that person's role was or who they were, but in my  
3 client's situation I genuinely cannot think of a single  
4 topic or question that they could be asked that would not  
5 be either under the Fifth Amendment or a link in the  
6 chain.

7 What's your name under these charges that they have  
8 said they are going to do by signing your name, by saying  
9 who you are, by putting your signature on something could  
10 arguably be, as ridiculous as that sounds, an  
11 incriminating fact, so I don't think my clients are  
12 similarly situated to these other witnesses that you are  
13 dealing with, anything they could be asked.

14 What's your name? That is incriminating. What's  
15 your job? That could lead to other political links in the  
16 chain, that could lead to e-mails where they talked about  
17 various issues. It could lead to anything. I don't see  
18 any topic that could actually be relevant to the Grand  
19 Jury's inquiry, upon which my clients could not invoke  
20 their federal, their state, or constitutional rights, and  
21 their statutory rights, and I think absence of proffer  
22 that there is such a subject that you would agree with  
23 that is not incriminating.

24 Eleven people should not be essentially frogmarched  
25 in front of the cameras and the Grand Jury to be forced to

1       invoke their rights, and I echo Mr. Dillon's concerns  
2       about publicity, you know, we're not use to that. We are  
3       federal prosecutors, there is Grand Jury secrecy. We  
4       don't have that here, but the damage is being done and has  
5       already been done to all of my 11 clients, and I assume to  
6       Senator Jones, is affected, and it's only going to be  
7       exacerbated.

8               I mean the threats that they're getting, the hate  
9       mail that they're getting, the hate e-mails they're  
10      getting here, Your Honor, for doing, in our view nothing  
11      wrong. They are caught up in ambiguous circumstances,  
12      which gives them the right under the Supreme Court  
13      precedent to invoke their privileges.

14             THE COURT: We're not going to get into whether they  
15      should be surprised or not that they have become the  
16      subject of negative attention, based on the decisions  
17      they've made, but I'm wondering. You have now tried to  
18      put your arm around Mr. Dillon's client, who is in an  
19      actively contested election. I am not aware of any of  
20      your clients being in that position as well, but again, I  
21      don't recognize all of their names.

22             ATTORNEY PEARSON: Your Honor, Mr. Still, Mr. Sean  
23      Still is a candidate for senate office, and in addition,  
24      Mr. Schafer is the chairman of the GOP, and he is involved  
25      in all of these, and many of these people are involved in

1 the electoral arm of the Georgia Republican Party for many  
2 of these races, so while and I think the point is, Your  
3 Honor, so while Mr. Jones is involved in his race, and Mr.  
4 Still is involved in his race, a lot of these people are  
5 involved in all of these races, and I think the point is,  
6 Your Honor, AVA regulations with Georgia Professional  
7 Responsibility Rules cite favorably with special  
8 prosecutor rules.

9 They specifically say a target should not be put in a  
10 Grand Jury unless they are immunized, and here you know  
11 they can't be immunized because they're federal, and under  
12 the statute you can't immunize against a federal, so here  
13 the burden really should be on them to come forward with  
14 some bucket, as you call it, that they can show we can't  
15 invoke on it. If we can invoke on all of the buckets they  
16 should not be dragged down here in front of the Grand  
17 Jury, Your Honor.

18 THE COURT: Okay, do I need to check with Ms.  
19 Debrorogh as well, or do you guys both have an agreement  
20 that she will speak up if there's something she wants to  
21 add?

22 ATTORNEY PEARSON: Your Honor, you know Ms.  
23 Deborrough. If she's got something to add she certainly  
24 will, but I think I covered it.

25 THE COURT: All right. Mr. Wakeford or Mr. Wade,  
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1 talk to me a little bit about the last, second to last  
2 point I heard from Ms. Pearson about an inability to  
3 immunize because, of course, one ticket you can punch that  
4 you may not want to punch for anyone, but you may for some  
5 of the alternate electors whose sole connection or primary  
6 connection to what you're investigating may be the  
7 alternate elector situation, would be to let them know  
8 that nothing you say during a Grand Jury can be used  
9 against you.

10 If you put that in writing then you magically have  
11 some compulsory powers, I do, that did not exist before,  
12 but if there is not a way to provide sufficient protection  
13 you may not have that, and I hadn't processed it the way  
14 Ms. Pearson did. Anything you want to add on that? Mr.  
15 Wade is shaking his head. As in you disagree or I don't  
16 want to add to it?

17 ADA WADE: I vehemently disagree, and there was no  
18 effort or attempt or even any indication that our position  
19 would be to offer any type of immunity, if that is what  
20 she's looking for.

21 THE COURT: I didn't hear Ms. Pearson looking for  
22 anything. What I heard her say was that even if you  
23 wanted to, and you're saying I don't want to, the scope of  
24 the District Attorney's offices offer of immunity wouldn't  
25 be sufficient in Ms. Pearson's mind to protect her clients

1       such that they could be compelled to testify, but we don't  
2       need to work through that if that's nothing that the  
3       District Attorney's office is looking at right now.

4             ADA WADE:   Okay.

5             THE COURT:   So then what do you see, and I guess, the  
6       vision you have for moving forward with the Fifth  
7       Amendment concerns, Mr.Wade, would be to have the kinds of  
8       individualized discussions like we had yesterday, and like  
9       you suggested you would have with counsel.   I guess it  
10      would be Ms. Pearson and   Ms. Deborrough for theses 11,  
11      Mr. Dillon and Ms. Clapp for Senator Jones to talk about  
12      the buckets.

13            In no way would I be requiring that here are the 112  
14      questions, here is a script, but it would be that these  
15      are the categories that we want to explore, and then there  
16      are the disagreements between your team and counsel for  
17      the witness, then we might need to have a group  
18      discussion.

19            ADA WADE:   I think much like the process on last  
20      evening, on the day of the witnesses testimony, have that  
21      conversation.   If we can agree upon the buckets, great.  
22      If we can't, then Your Honor would be asked to get  
23      involved.   I don't think that having a conversation well  
24      in advance of 11 people's testimony -- I don't think it's  
25      fair.   I think it puts the State at a disadvantage.

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1           THE COURT: No, I agree. I wasn't suggesting that  
2 you had to map it out in a lot of detail or particularly,  
3 far in advance, but more along the lines of what we talked  
4 about yesterday.

5           ADA WADE: Yes, sir.

6           THE COURT: One more question for one or the two of  
7 you. If target letter is not a reason to conclude that a  
8 witness shouldn't appear in front of the Grand Jury, this  
9 is a two-part question, is it not at least a reason for  
10 that witness to have heightened concern, and if not, why  
11 send it? What was the purpose of it?

12           If the purpose was to get them more concerned  
13 shouldn't they be more concerned and say wait a minute?  
14 I'm not going to answer these questions in front of a  
15 Grand Jury. I might sit down with you and have a proffer  
16 if it's protected, if it can be protected enough. I'm  
17 trying to understand the thinking.

18           ADA WADE: Judge, to be transparent with the Court,  
19 the discussions that took place with our side and Ms.  
20 Pearson and Ms. Deborrough prior to a few of their clients  
21 having voluntary interviews, the questions were what is  
22 the status of my client at this point? We disclosed the  
23 status of the client at that point - -

24           THE COURT: So it was responsive. It wasn't  
25 proactive, it was reactive. You're asking - -

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1           ADA WADE: And we said to them at that time, if at  
2 any point the status of your client were to change, we'll  
3 disclose that as well, and we did that.

4           THE COURT: So that explains why, but then help me  
5 think through what the consequences should be of that  
6 elevation in status. I assume it wasn't a downgrade that  
7 you've been downgraded from, we've actually already  
8 indicted you and we've dismissed it, and now you're only  
9 target. Why shouldn't there be the enhanced concern and  
10 the beginning of the discussion that it may be that my  
11 client is going to invoke his or her Fifth Amendment  
12 rights here?

13          ADA WADE: And certainly this discussion, Judge, from  
14 our perspective, is not an attempt to circumvent anyone's  
15 rights in terms of a fifth amendment, so I think that what  
16 comes up is exactly what we're doing.

17          THE COURT: Okay.

18          ADA WADE: It gives Ms. Pearson the right to stand  
19 up and say this is not what we want, and it gives the  
20 State the right to stand up and cite Lampl, they'll have  
21 to come in and do that.

22          THE COURT: Lampl Bank of Nova Scotia. They need to  
23 come in and assert it in front of the Grand Jury as  
24 opposed to having a lawyer say or the witness, him or  
25 herself, you know what? I'm thinking about it, I'm not

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1 comfortable doing that. No matter what you ask me, I'm  
2 going to invoke.

3 ADA WADE: Yes, sir.

4 ATTORNEY PEARSON: Your Honor, may I respond briefly?

5 THE COURT: I was just about to ask you that, and  
6 there you go.

7 ATTORNEY PEARSON: Your Honor, that's not what Lampl  
8 says, as you accurately pointed out. It says they can  
9 subpoena people to a Grand Jury, and if that special Grand  
10 Jury abuses its power, you'd better bring it up at the  
11 time or there is nothing you can do about it later. We're  
12 not going to suppress the evidence. We're not going to do  
13 it, so it doesn't have anything to do with this Court's  
14 authority, either under the quashal statute or the  
15 supervisory ability of this Court to quash and otherwise  
16 properly serve a subpoena.

17 We're not saying they can't subpoena us. We're  
18 saying you could quash it, and we're asking you to. It's  
19 clear, I don't think, Your Honor, that under these facts  
20 it is sufficient to drag 11 people in here and then have  
21 them figure out the buckets. I genuinely cannot think of  
22 a single question or area of questioning that I would be  
23 comfortable allowing them to ask my clients including  
24 their names, under these circumstances, and they shouldn't  
25 be dragged down here from far away places of the State

1 just to be told, you know, either by you or us coming to  
2 you for 11 witnesses, however many times that they are not  
3 going to answer the questions.

4 They should have to come forward with at least a  
5 bucket list, so to speak, that Your Honor approves before  
6 they are dragged down here. That is not too much to ask,  
7 and if it can't be done before their appearances next  
8 week, then you can quash them and we can revisit it, and  
9 we can set them for a different time, but they should not  
10 be dragged down here and put on public display for doing,  
11 in our view, nothing wrong, but their own ambiguous  
12 circumstances being forced to invoke their rights, and  
13 it's just not appropriate under the Ethical Standards  
14 under the Georgia Professional Standards - -

15 THE COURT: But if they did nothing wrong, why aren't  
16 they talking to the Grand Jury?

17 ATTORNEY PEARSON: Because she's called them targets.  
18 I mean, Your Honor, we've outlined in our motion why we  
19 don't even think there's jurisdiction here, why the law  
20 protects what they did, but as you know the Supreme Court  
21 has made clear that the main purpose, one of the main  
22 purposes of the Fifth Amendment is to protect innocent  
23 people who can be bound up in ambiguous circumstances, and  
24 I don't think but you're going to find, at least the cases  
25 that I've never been in where ambiguous circumstances are

1 more ambiguous and politicized and fraught than this, and  
2 so, you know, that is why - -

3 THE COURT: I don't know that politicized makes it  
4 ambiguous, but you're using the word ambiguous, and I'll  
5 let you use that word.

6 ATTORNEY PEARSON: We certainly have different views  
7 of the facts in the law, Your Honor.

8 THE COURT: There are entirely different views of  
9 certain facts and non facts, I hear you on that, but I  
10 don't know if that makes it ambiguous, but I hear you, and  
11 I am mindful of an inconvenience factor, if in the end the  
12 product of the exercise is to have a witness say I assert  
13 the Fifth, and that's it.

14 Hopefully, folks will exercise discretion, but I  
15 don't think there is, other than some rules that apply  
16 more in a Federal setting where the word target means  
17 something different, not entirely different, not entirely  
18 different. I wasn't able to find any legal precedent that  
19 says it was improper that the Court should have barred the  
20 investigating body from requiring someone to come in and  
21 in their face saying I'm not answering any questions. I'm  
22 not even going to tell you my name. That may actually be  
23 something that the Grand Jury may want to know, that this  
24 person won't even give her name under oath. That could be  
25 instructive to what the Grand Jury is doing, but they

1 wouldn't know that if they never met the person.

2 ATTORNEY PEARSON: Well, given that they're not  
3 supposed to draw any negative inference from an  
4 invocation I wouldn't think that would be evidence, but  
5 even if it were, I think the reason you can't find any  
6 precedence is because in the Federal system, and then the  
7 State system doesn't do Grand Jury work very often, and  
8 then the Federal system they don't do this. .

9 They don't bring targets in and try to force them to  
10 testify because they recognize it's unethical, as the AVA  
11 has said and as the Georgia Professional Rules have  
12 outlined, and we would ask that at a minimum, Your Honor,  
13 that you ask them proffer the buckets to you or to us  
14 before our people are brought in.

15 THE COURT: Fair request. I appreciate that.

16 ADA WAKEFORD: Your Honor, may I address one point?

17 THE COURT: Hold on. Mr. Dillon, if you're going to  
18 talk more about disqualification, not yet. If it's the  
19 Fifth Amendment you've been patient, so I'm happy to hear  
20 from Senator Jones' perspective.

21 ATTORNEY DILLON: Keeping quiet my mouth quiet in  
22 this whole disqualification thing - -

23 THE COURT: But go ahead.

24 ATTORNEY DILLON: Trust me. I call the Court's  
25 attention to the Georgia Code, that's 15-12-100. It's a

1 procedure for a special Grand Jury and hours of that Grand  
2 Jury, and under Subparagraph C it says, "while conducting  
3 any investigation authorized by this part, investigative  
4 grand juries may compel evidence and subpoena witnesses."  
5 It may inspect records, documents, correspondence, and  
6 books, blah, blah, blah , and it specifically excludes  
7 subpoena targets, Your Honor, and these are the rules --

8 THE COURT: You mean it says you may not do that or?

9 ATTORNEY DILLON: No, it doesn't, but because it is  
10 not included in the list, we all know the cannons of  
11 constructing statutes. If there is a list and it's not  
12 included in the list, it's excluded from the list, and  
13 this is the provision under which this Grand Jury was  
14 impaneled.

15 THE COURT: It didn't say subpoena tall people or  
16 short people, it says witnesses.

17 ATTORNEY DILLON: It says witnesses.

18 THE COURT: You're saying a target is not a witness?

19 ATTORNEY DILLON: A target is a different category  
20 than a witness, and the case law in the state of Georgia  
21 says that because targets are discussed differently in the  
22 Lampl case, and that's a good case to cite on. A target  
23 is different than a witness, and this doesn't say subpoena  
24 targets. It says subpoena witnesses.

25 THE COURT: Okay. Mr. Wakeford.

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1           ADA WAKEFORD: Your Honor, I'll read directly from  
2           Lampl.

3           THE COURT: Lampl is getting a lot of attention. Am  
4           I right? Is it a Clayton County - - It was some sort of  
5           city counsel - -

6           ADA WAKEFORD: I think so, Your Honor.

7           THE COURT: Ms. Green-Cross is now nodding her head.  
8           She would know. She's the appellate expert. All right.  
9           Continue.

10          ADA WAKEFORD: "One who has not been so charged,  
11          meaning formally charged, in a formal charging instrument  
12          --

13          THE COURT: Which would be every single recipient of  
14          a subpoena so far?

15          ADA WAKEFORD: Yes.

16          THE COURT: All right.

17          ADA WAKEFORD: -- may be compelled to appear before a  
18          Grand Jury that he retains the option during his  
19          appearance of invoking his privilege against  
20          self-incrimination and refusing to testify regarding the  
21          incriminating matters, this is true even if the witness is  
22          a target of the grand jury's investigation."

23          THE COURT: So Mr. Dillon stood up first, and he's  
24          freshest from saying ha ha, take Lampl that way, State.  
25          So did he skip a sentence? That's a pretty powerful

1 sentence, Mr. Dillon.

2 ATTORNEY DILLON: A very powerful sentence, and with  
3 regard to regular grand juries, I have no doubt that the  
4 District Attorney might, but the statute under which the  
5 subpoena is issued in this case properly is not that the  
6 ordinary Grand Jury, nor the special grand jury, and it's  
7 under this chapter in the Georgia code, and the rules are  
8 different.

9 THE COURT: So your argument is that a regular Grand  
10 Jury that could indict and would target -- Lampl says you  
11 can call that person in front of a that Grand Jury who has  
12 the ability to indict Lample, and they can invoke his  
13 Fifth from which they need to draw no adverse inference,  
14 but a special purpose Grand Jury which can indict no one  
15 or anything, they can't subpoena a target because they use  
16 the word witness instead of target?

17 ATTORNEY DILLON: Yes, Your Honor.

18 THE COURT: Is the word target used in the  
19 non-special purpose Grand Jury statute, or is the word  
20 witness used?

21 ATTORNEY DILLON: Interesting question, Your Honor,  
22 but I do note that the subpoena is - -

23 THE COURT: What's the answer?

24 ATTORNEY DILLON: I don't know, but I do note that  
25 the statute under which the subpoenas were supposed to be



1 issued in this case is under Title 15, but the subpoena is  
2 actually rolled out under the provision of the Georgia  
3 code that is not under Title 15, and they were, in fact,  
4 technically, improper subpoenas because they were issued  
5 under the normal statute and not under this chapter.

6 THE COURT: So I guess we could republish them and  
7 resign them if that is the - -

8 ATTORNEY DILLON: Exactly, and then recognize that  
9 this rule applies, but not the Lampl rule that we're  
10 citing here.

11 ATTORNEY PEARSON: Your Honor, we would take a  
12 slightly different differentiation of Lampl - -

13 THE COURT: A third reading.

14 ATTORNEY PEARSON: It's actually the same read, and  
15 that is the sentence that he read is (unintelligible) What  
16 the the Supreme Court is saying in Lampl, we have an  
17 individual who didn't take his Fifth in the Grand Jury,  
18 the special purpose grand jury, the special purpose Grand  
19 Jury used its authority to have a conveyer who was later  
20 indicted in an improper Grand Jury.

21 I'm not suggesting they were improper, but a  
22 different regular Grand jury, and then he tried to get  
23 evidence suppressed from the special Grand Jury. This is  
24 not about whether they can compel people. We're not  
25 disputing they can issue the subpoenas, everybody says

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1       they can. That is the only thing Lample even arguably  
2       says. The only issue then is you get to quash them if you  
3       want to.

4             If you believe that you should, and there's nothing  
5       that says your authority under the statute, or under  
6       supervisory authority is in any way affected by Lampl at  
7       all whatsoever, so you clearly have the authority to do  
8       what you think is proper with this Grand Jury here, and  
9       we're asking you, on behalf of our clients, not to have  
10      them frogmarched in front of a cameras and in this  
11      courtroom.

12            THE COURT: Okay.

13            ADA WAKEFORD: At this point I was going to address  
14      the original point I was going to make, which is I believe  
15      we've heard the phrase "frog marched" in front of the  
16      cameras three times now.

17            THE COURT: All right.

18            ADA WAKEFORD: I do not want to talk about this, but  
19      I have to at this point. Publicity is a hindrance to the  
20      special purpose Grand Jury's work. I believe earlier  
21      Ms. Pearson stated that there may have been a witness in  
22      here yesterday, but she didn't know who it was or how they  
23      appeared, or what they had talked about, which is an  
24      indication that the witnesses can come before the special  
25      purpose Grand Jury, and no one ever know anything about

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1       it. If witnesses exercise their First Amendment right to  
2       disclose after the fact or before the fact they were  
3       called, then they are allowed to do that. That is the  
4       source of publicity around this. It is, I think here we  
5       are tired of hearing that there is publicity jammed up by  
6       the District Attorney's Office in order to create a circus  
7       around this when we have actually taken pains to try to  
8       create an environment of circus around this, so there is  
9       no frogmarching, and there are ways to come before the  
10      special purpose Grand Jury without publicity being brought  
11      into it. I just wanted to clarify it right after the  
12      third time we heard that phrase.

13           THE COURT: Okay. Well, I appreciate much of what  
14      you said. I think it's a little rich to suggest that any  
15      particular side that has avoided the cameras. One need  
16      look only at basically any major news outlet, and you will  
17      see who is talking to the media, and it is not always the  
18      lawyers for the witnesses, so I think everyone involved in  
19      this has taken full advantage of media coverage.

20           That said, they're are some things that can be done,  
21      I know, because I've been asked to be involved with it to  
22      ensure that witnesses can enter into the building and  
23      leave the building without much harassment from the media,  
24      and we can get to do that.

25           I don't know that there are many of Ms. Pearson's  
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1 clients that the media would even recognize when they  
2 walked up the front steps of the courthouse if that's how  
3 they came in, so I think the concern about putting people  
4 on public display is a bit exaggerated for most of her  
5 clients, but if there are clients who need special  
6 accommodations and ingress and egress we can always  
7 accommodate them, we've done it before and can do it  
8 again. Anything more from the District Attorney's office  
9 on the fifth Amendment concerns raised in Ms. Pearson and  
10 Mr. Deborrough's motion as expanded by Mr. Dillon?

11 ADA WAKEFORD: No, your Honor. We have responded to  
12 your questions, and we have proposed a method going  
13 forward, and we have nothing else to add.

14 THE COURT: Thank you. Okay. Ms. Pearson or Ms.  
15 Deborrough, anything else on behalf of your 11 clients in  
16 connection with the quashal of the requests, in other  
17 words the Fifth Amendment concerns?

18 ATTORNEY PEARSON: I think that's it, Your Honor.

19 THE COURT: Mr. Dillon, anything more on the Fifth  
20 Amendment aspects?

21 ATTORNEY DILLON: No, Your Honor, we've got the  
22 motion as communicated earlier.

23 THE COURT: Okay. Thank You. So I will not be  
24 quashing any of the subpoenas, but I will be asking -- we  
25 may need to change some of the timelines. How many of

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1        your 11 are coming all at once? Are all 11 supposed to  
2        come out the same day or are they spread out, Ms. Pearson?

3        ATTORNEY PEARSON: Your Honor, we have - - they are  
4        all coming on the 26th, 27th, and the 28th, so that's 3,  
5        4, 5. I allocated over the states maybe 9 exactly.

6        THE COURT: The process is going to take longer  
7        because what will happen, I suspect it will become more  
8        regularized and streamlined after the first few of your  
9        witnesses, but what will need to happen is that your  
10       witness, and you Ms. Pearson and Ms. Deborroughs, if she  
11       clears quarantine she can be here too. She can appear  
12       virtually, however we need to make it work, however we can  
13       make it work.

14       We'll need to sit down, and it may just be lawyers at  
15       first, so you can have your client wherever you want them  
16       to be, as long as he or she is in the building, and  
17       you're going to have that bucket conversation and see  
18       where there is agreement or disagreement, and you've made  
19       very clear that you can't think of anything, not even  
20       astrological signs because somehow that would be tied to  
21       something, or it would be irrelevant, but that  
22       conversation needs to happen so that that we can, lawyers  
23       and I can have a conversation about is it really a  
24       complete impasse, of I may make the ruling, and you can  
25       challenge it in whatever way you want, that the witnesses

1 will need to go in front of the Grand Jury to answer name,  
2 rank, and serial number and then the rest will be Fifth  
3 Amendment.

4 It helps the District Attorney's office has 12  
5 because they know basically that they're going to ask one  
6 question beyond name, rank, and serial number, if I get  
7 folks passed that because there is not an area that can be  
8 explored that I don't think is unprotected by the Fifth  
9 Amendment.

10 ADA WADE: One thing I believe, Judge, from our side  
11 that is noteworthy, is the very thing that the District  
12 Attorney's office has fought so hard to do, was keep our  
13 witnesses secret and out of the public eye. What Ms.  
14 Pearson just did was, she gave the dates that her clients  
15 were coming in here, that's the exact thing she's  
16 complaining about. She gave - -

17 THE COURT: Well, before we draw more attention to  
18 this, I did not hear Ms. Pearson say Steve Jones is coming  
19 in on this day. She divided it over days and did not  
20 identify people, and I mentioned, if there is a concern  
21 about letting someone in the building discreetly, we can  
22 address that and get someone in the building discreetly.

23 Most of these folks who walk, as long as they are  
24 wearing normal clothes, they can walk right in the  
25 courthouse, and those cameras that seem to be glued to our

1 courthouse steps right now wouldn't even pivot on that, so  
2 I think the concern is greater than it needs to be, but we  
3 can accommodate it. I'm not going to ask someone to be  
4 more specifically about who is going to be here when, I  
5 just need to know if it's going to take a while for these  
6 witnesses because there will be the conference before the  
7 witness testifies. .

8 Testimony may be greatly reduced because of the  
9 outcome of the conference may be that testimony is going  
10 to be just as long as the District Attorney's Office had  
11 forecast, but there's still this lawyer-to-lawyer  
12 conference in advance, but that's how we're going to work  
13 through it, and as I said, we may develop some guidelines.

14 A ruling I make with Witness One, isn't going to  
15 apply to Witness Two insofar as she is similarly  
16 situated. I don't believe all are similarly situated.  
17 There's still the overlap. They are all alternate  
18 electors, so there are certain commonalities, and I assume  
19 that is why they all want to have you and Ms. Deborrough.  
20 Similarly, they are all situated in this same situation,  
21 but they are not clones, and so there may be areas that  
22 are explorable with Witness One that are not explorable  
23 with Witness Two, so I'm going to let the parties develop  
24 the framework they want to use as we go forward.

25 I am here to assist when you reach an impasse, but I  
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1 don't think it's appropriate under the case law Lampl and  
2 others to quash the subpoenas, but it may be that these  
3 witnesses have very, very, brief appearances in front of  
4 the Grand Jury.

5 ATTORNEY PEARSON: Your Honor, just so that I  
6 understand. We aren't going to elaborate on it ahead of  
7 time. We will collaborate when the first witnesses come  
8 here or in between each witness? I mean, we've got 11  
9 people to get through, so I guess I need some clarity on  
10 how that's going to work for each witness.

11 THE COURT: So I invite early collaboration, but I  
12 also understand that if the District Attorney's Office is  
13 reluctant to get too specific too far in advance, so they  
14 may buckle under the pressure of how long that would take  
15 as well, and there may be some basic frameworks that they  
16 want to share with you in advance, but if you're now  
17 getting into the nuts and bolts that I get to stay out of.

18 I will get in the mix should an impasse be reached.  
19 If that impasse is reached tomorrow, because you're  
20 talking about a witness who is coming on an undisclosed  
21 date next week, at an undisclosed location, then I could  
22 talk with you all tomorrow, but it may well be that the  
23 default is let's talk when you're witness is here.

24 That may mean you won't get to everything next week.  
25 That was - - the reason why I was asking is that if they



1 are spread out you four weeks you - - they're all coming  
2 in next week. I could see it being that what had been  
3 scheduled for Thursday ends up being what was scheduled  
4 for Tuesday, because you only got through two people on  
5 Tuesday because of the confirming that doesn't occur until  
6 Tuesday, so I'm not forcing an answer to your question,  
7 what you develop with the District Attorney's Office.

8 ATTORNEY PEARSON: In light of that, Your Honor,  
9 would the Court at all be amenable to to moving our grand  
10 jurors, not quashing them but moving them to later so that  
11 we can work this process out in advance?

12 THE COURT: So another really good question for you  
13 to explore with the District Attorney's office, they may  
14 think that's wise and necessary as well, and it may well  
15 be that 6 of the 11 go next week because everything is  
16 taking a little bit longer because we are being careful  
17 about the concerns raised in your motion, but I have made  
18 clear that other than checking on the welfare of the Grand  
19 Jury, in other words they are not in session from 8 a.m.  
20 to 10:00 p.m.

21 I don't micromanage who gets called it or when, but  
22 I'll let you know that the District Attorney's office has  
23 been flexible at having to move things if obstacles come  
24 up.

25 ATTORNEY PEARSON: Well, we had asked for that, Your  
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1 Honor, and they refused, that's why I brought that up, but  
2 we'll talk to them about it.

3 THE COURT: Well, things are a lot less streamlined  
4 than they were before, so you work through that.

5 All right. Let's talk about disqualification and  
6 this process has moved up to the driver's seat on the DA's  
7 side, and I think since Mr. Dillon got in about three  
8 quarters of his argument in answering my simple question  
9 of do you think it's moot or not, I want to give the DA's  
10 office a chance to share some of their perspective about  
11 it.

12 I think the word partisan gets thrown around a lot in  
13 this and why they think disqualification doesn't fit or  
14 how to manage what I think are some valid concerns that  
15 Senator Jones has raised through counsel, but at a minimum  
16 pretty clear appearance of conflict, if it's developed not  
17 before the investigation started but in the midst of it.

18 ATTORNEY GREEN-CROSS: Thank you, your Honor. I  
19 think Your Honor has used the phrase appearance of  
20 impropriety. There is Mr. Dillon's use of the phrase  
21 appearance impropriety or appearance of conflict, and the  
22 first place the State is going to direct your attention to  
23 is on the law cited in the responsive brief that  
24 appearance of conflict is enough.

25 Under Georgia law, the disqualification of a  
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1 prosecuting attorney or entity requires an actual  
2 conflict, not speculative, not conjecture, but an actual  
3 personal interest, and in this case would be the  
4 investigation of the special purpose Grand Jury or the  
5 prosecution potentially of Senator Jones.

6 So I think that while optics in this case may be  
7 more front and center than in some others, optics doesn't  
8 carry the day, it's an actual conflict, and there's just  
9 nothing at all that suggests that there is the actual  
10 personal interest on the behalf of the District Attorney.  
11 I'll note that insofar as the motion target, special  
12 prosecutor Wade, there is --

13 THE COURT: Oh, thank you for that. Pause on that.  
14 Mr. Dillon, do you agree -- originally we were going to  
15 talk about just disqualification and Ms. Deborrough, and  
16 Ms. Pearson arrived on the scene about the Fifth  
17 Amendment. My first question was meant to be that, do you  
18 agree, Mr. Dillon, that Mr. Wade's purported donations,  
19 and I'm not attributing anything to him, but it looks like  
20 from the records that Mr. Wade gave \$2,000 to Mr. Bailey  
21 when Mr. Bailey was running for Attorney General.

22 No donations of record or any public insofar as the  
23 donations is the public because records are made of it, no  
24 public donations in support of Charlie Bailey by Nathan  
25 Wade since Charlie Bailey switched races, and is instead

1       trying to be Lieutenant Governor instead of Attorney  
2       General; do you agree with that?

3             ATTORNEY DILLON: I agree with that, Your Honor.

4             THE COURT: Okay.

5             ATTORNEY GREEN-CROSS: That was my whole paragraph.

6             THE COURT: You don't need to cover that, because  
7       that was very persuasive.

8             ATTORNEY GREEN-CROSS: Thank you.

9             THE COURT: If that fact is true, I am focused very  
10       much on the appearance of the District Attorney. Using  
11       that title District Attorney Fani Willis, invites you and  
12       encourages you to come to this fundraiser for the  
13       political opponent of the target of my investigation.  
14       That's what we need to navigate here, and I guess the  
15       question is, if there's an actual conflict, is  
16       disqualification mandatory or discretionary, and if it's  
17       mandatory then does that mean that the appearance of  
18       conflict still give the judge the discretion to fashion  
19       some form of relief?

20             ATTORNEY GREEN-CROSS: Let me start with the last  
21       question. No.

22             THE COURT: No?

23             ATTORNEY GREEN-CROSS: I don't think the Court has  
24       the discretion law. While I want to give the Court as  
25       much discretion as you want to have - -

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1 THE COURT: Only what it should have.

2 ATTORNEY GREEN-CROSS: Yes. I don't think the law  
3 allows the Court to elevate the standard, what the legal  
4 standard is an actual conflict. I don't believe that the  
5 Court's discretion is broad enough to force a remedy for  
6 an appearance of conflict.

7 THE COURT: And examples of actual conflict that I  
8 saw in your pleading were somehow the prosecutor was able  
9 to be like a defense attorney at the same -- I mean it was  
10 these things where like what were you thinking? Yes, it  
11 was kind of crazy. I represent one co defendant and as  
12 the defense attorney in a criminal proceeding become the  
13 DA and the prosecute the co defendant.

14 THE COURT: okay.

15 ATTORNEY GREEN-CROSS: That makes no sense, and that  
16 is not the situation we've got here, but that is the kind  
17 of extreme example of what the law recognizes as an actual  
18 conflict for a prosecuting attorney, at one time I  
19 represented the victim in a case that is now before me in  
20 a divorce preceding who is now before me in a case.

21 It's that kind of really striking in your face and  
22 routine political support for a political ally. It just  
23 doesn't make it there. It doesn't go that far.

24 THE COURT: The routine -- I would interpret as Mr.  
25 Wade strokes a check for the candidate he wants to

1 support. Using the title of your office and having a  
2 social media that you as this political office holder are  
3 holding a fundraiser for the opponent of someone that this  
4 political office is investigating. I don't know that it's  
5 an actual conflict, but I use that phrase, "what were you  
6 thinking," where the prosecutor thought I could prosecute  
7 the codefendant of someone I defended.

8 It's a what are you thinking moment? The optics are  
9 horrific. If you are trying to have the public believe  
10 that this is a non-partition driven by the facts, and I'm  
11 not here to critique decisions. The decision was made,  
12 but If we are trying to maintain confidence that this  
13 investigation is pursuing facts in a non-partisan sense,  
14 no matter who the District Attorney is, we follow the  
15 evidence where it goes and ignore that fact that I hosted  
16 a fundraiser for the political opponent of someone I just  
17 named a target.

18 That strikes me as problematic. Maybe not from an  
19 actual conflict level, but if we are at a cocktail party  
20 and people are asking do you think that this is a fair and  
21 balanced approach to things, I do. Well, how do you  
22 explain this?

23 I mean, how does one explain? I mean, that is the  
24 concern I'm working through is that it is not a lowercase  
25 A appearance, it is a capital A with flashy lights

1 fundraiser District Attorney for the political opponent of  
2 someone I've named a target of my investigation, while I'm  
3 a legal adviser of the Grand Jury, and I'm on national  
4 media almost nightly talking about this investigation  
5 and That's problematic.

6 ATTORNEY GREEN-CROSS: Okay. Not accepting the  
7 entirety of the Court's characterization of the series of  
8 events. I'm going to explain it in a couple of ways.  
9 First, it's still not a legal conflict. It's still not  
10 anything within the Court's discretion to remedy in the  
11 way that Mr. Dillon has advocated on behalf of Senator  
12 Jones. As a legal matter, everybody can talk at cocktail  
13 parties all they want and watch the cable news station of  
14 their choosing, but no matter what it still doesn't amount  
15 to a legal conflict under Georgia law.

16 Second, I want to direct the Court's attention to the  
17 absolute lack of any evidence to the case that any action  
18 taken during the course of the investigation has been  
19 politically motivated at all. As the Court made  
20 reference, and maybe I'm paraphrasing, but it's the Grand  
21 Jury's duty to Senator Jones, not the District Attorney's  
22 office.

23 The District Attorney is the legal adviser of the  
24 special purpose Grand Jury, and may well have an  
25 investigation of their own, but Senator Jones is trying to

1 fight a subpoena to the special purpose Grand Jury, and it  
2 was brought under their authority.

3 THE COURT: It was, and I think technically you are  
4 correct. I wouldn't want anyone to be misled, that the  
5 special purpose Grand Jury is the only -- meaning those  
6 grand jurors are the only source of subpoenas that they  
7 say to their legal adviser, where is what we'd like to see  
8 next. That can happen, but what can also happen, and it  
9 doesn't matter who it happened here because your point is  
10 a good one, but I don't want people leaving here thinking  
11 oh, it's only the special purpose Grand Jury that decides  
12 to come in and. Equally so and perhaps most of the time  
13 it's the District Attorney's team that says, here's who we  
14 would like to have come before the special purpose Grand  
15 Jury next. .

16 That subpoena comes through the Grand Jury maybe the  
17 wrong statute under the subpoena, but it comes through the  
18 Grand Jury, but the idea, motivation, and the decision is  
19 from the District Attorney's office. I don't know how  
20 Senator Jones' subpoena which channel from which it  
21 flowed, I've got an inkling, but it doesn't matter. Your  
22 point is a good one.

23 I don't know that it cures the concern about  
24 political support for an opponent not having any bearing  
25 on how focused or not the special purpose Grand Jury would



1 be on the person I'm supporting's political opponent before  
2 November X, whenever the election is.

3 ATTORNEY GREEN-CROSS: I understand, and I didn't  
4 mean to imply otherwise to the public in my report, but I  
5 certainly understand the need to clarify that. The larger  
6 point being though, I think in this posture is that,  
7 Senator Jones is still in obligation to some action taken  
8 during the investigation that is the Court's allegation of  
9 a political motivation, and you just haven't seen it here.  
10 The -- Yes, sir.

11 THE COURT: Mr. Dillon will get a chance to say more,  
12 but part of his introductory remarks he emphasized a whole  
13 lot then this target letter arise, like there was some  
14 cause and effect. I am not familiar with the timeline and  
15 you mentioned that my description of events may have  
16 gotten some of the timeline, and I'm not anchored to any  
17 particular timeline other than the correct one.

18 Hopefully, there is only one set of facts as to the  
19 timeline. What was your reaction to the way Mr. Dillon  
20 was painting -- it was almost a cause and effect timeline  
21 that X happens and as a result of X support for Charlie  
22 Bailey then Y happens, something that that in the public  
23 eye would be negative to Senator Jones.

24 ATTORNEY GREEN-CROSS: I represent to the Court, and  
25 I believe it's accurate that all of the target letters

1       went out at the same time.

2               THE COURT:   Okay.

3               ATTORNEY GREEN-CROSS:   So it was not pegged to any  
4       event that had any relevance of Lieutenant Governor's race  
5       or any other political option was dictated by the terms  
6       and the pace of that investigation.

7               THE COURT:   So the 11 that Ms. Pearce and Ms.  
8       Deborrough received were issued on the same day, and  
9       effectively the same time as Senator Jones?

10              ATTORNEY GREEN-CROSS:   Yes.

11              THE COURT:   It is not Senator Jones got his on a  
12       special day, and it was a broadcasted event, and then the  
13       other 11 went out?

14              ATTORNEY GREEN-CROSS:   It was a routine issuance of  
15       the change of status as Mr. Wade explained in an effort to  
16       be transparent to everyone who had been working and  
17       talking with the State.

18              The final point I think I kind of want to make is  
19       that, as noted in the brief, we have partisan District  
20       Attorneys and partisan elections for those offices, so it  
21       should surprise exactly nobody elected District Attorney's  
22       should have political affiliations with other individual  
23       within the same political party, and I think the post case  
24       -- I've got a copy for the Court if you are not familiar  
25       with it and a copy for Mr. Dillon.

1 THE COURT: Is there a cite?

2 ATTORNEY GREEN-CROSS: It is. 298 Georgia 241. It's  
3 a 2015 decision. It's post, P-O-S-T. I've got a copy  
4 that is highlighted. I'll hand Mr. Dillon the same copies  
5 that have been highlighted for the Court. May I approach,  
6 please?

7 THE COURT: Sure. Thank You.

8 ADA GREEN: On page 5 it is a reference. The case  
9 doesn't raise the issue of a prosecuting attorney who has  
10 been or sought disqualified by a defendant or target or a  
11 subject, or a witness in the case. It's an even higher  
12 stand to what a judicial recusal would be, and I think  
13 it's instructed as a lower standard -- I'm sorry, a lower  
14 burden and a higher standard for a recusal of Court, and  
15 in this case it was the situation where the District  
16 Attorney had been listed as a campaign official of a  
17 Superior Court judge's campaign at one time, and the Court  
18 in that case found -- well, that's beyond routine, it's  
19 beyond financial, it's beyond what we normally expect.

20 Although it even -- and so the Court concluded, You  
21 know what, when you got that allegation and the affidavit  
22 of recusal you should have sent that on. I'll note too  
23 though, that once it was sent on, the Court determined  
24 that that wasn't an actual (unintelligible), and it went  
25 right back, so I bring the language to the Court's

1 attention because it does draw a focus on these are the  
2 things that happen when you have political affiliations  
3 for elected offices. It's expected, it's normal, and  
4 until or it shows some actual conflict then that is just  
5 maybe the upside, maybe the downside, but that's a  
6 consequence of the system that we have.

7 THE COURT: Okay.

8 ATTORNEY GREEN-CROSS: One more final thing, and I  
9 think this could streamline some of our other  
10 conversations about remedy. The State is not interested  
11 in any summer surprises. I couldn't source that October  
12 deadline to anything. I'm unable to determine when that  
13 is. I don't believe we have that here. It's especially  
14 unlikely.

15 THE COURT: My understanding from speaking with the  
16 Grand Jury directly. My supervisory role is that the  
17 timeline is whatever the timeline is. There is no  
18 deadline, they like to be done with this soon, but that is  
19 only because they are giving much of their life to this  
20 process, but they'll follow this process as it unfolds,  
21 and as I intimated to Mr. Dillon and I'll make it clearer  
22 when I wrap up the disqualification session that if the  
23 work is completed such that it lands on or near the  
24 election, it will state in the pleading and be in my  
25 office until it gets disclosed after the election.

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1           ATTORNEY GREEN-CROSS: You won't be hearing any  
2           objection about that from the State.

3           THE COURT: I never I heard any requests to the  
4           contrary. What I heard is we don't know when it will end.  
5           When will it will be done, when we're done.

6           ATTORNEY GREEN-CROSS: I got a passed a note that's  
7           going to clear up that timeline. The political event for  
8           Mr. Bailey was June 14th, and the target letter was sent  
9           to Senator Jones and the others in that July 5th, July 6th  
10          timeline.

11          THE COURT: So three weeks later. All right. Mr.  
12          Dillon or Ms. Clapp. I'm happy to hear what you want to  
13          share. Don't repeat what you already said because I heard  
14          that. I'd like you to start with Ms. Cross's focus, and  
15          it is different. I'm very familiar with the judicial  
16          requirements and the impact and affect of apparent  
17          conflicts, and Ms. Cross's observation is the District  
18          Attorney is not a judge.

19          This is true, but because of that the apparent  
20          conflict may be an area of concern that we ought to talk  
21          about, but that it would not require me to take any  
22          remedial action, only if there were an actual conflict,  
23          and even if it was an actual conflict, but I don't  
24          disagree with you if you say there is an appearance of a  
25          conflict. You don't need to try to convince me of that.

1           If that's not enough, legally, then we'll all agree  
2           that there was an appearance of conflict, hopefully  
3           something like that doesn't happen again between now and  
4           the conclusion of this electoral cycle, but that is what I  
5           need you to start with appearance verses actual and  
6           anything else we need to cover that you already didn't.

7           ATTORNEY DILLON: Your Honor, if I may. My associate  
8           has a power point, and we'd like to plug into the screen  
9           if that is possible to the Court.

10          THE COURT: It is, Ms. Clapp is a part of this zoom  
11          session, and you're able to share your screen. Is what  
12          you're going to share something you shared with Ms. Cross  
13          or is this brand new?

14          ATTORNEY DILLON: We have not shared this with Ms.  
15          Cross.

16          THE COURT: It's not evidence?

17          ATTORNEY DILLON: It's not evidence, but we do have  
18          some exhibits, Your Honor, we do have some evidence here  
19          today.

20          THE COURT: Okay, if there is going to be evidence,  
21          let's just make sure Ms. Cross gets a chance to see it  
22          before we blast it on the screen.

23          ATTORNEY DILLON: Absolutely. oh, no. It won't be  
24          blasted on the screen. It won't be published before --

25          THE COURT: Okay.

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1           ATTORNEY DILLON: As the initial point, Your Honor,  
2 I'd like to point out that Senator Jones received his  
3 Grand Jury subpoena in late May, and he was set for  
4 testimony in late July.

5           We won't go into the date because we don't want to  
6 create a bottle neck, but he was assured by the DA's  
7 office that he was a witness in the case, and he was glad  
8 to do his civic duty. We were trying to work out the  
9 parameters for a voluntary interview to avoid the reptile  
10 marching. I won't use that term. while I like it, I just  
11 won't use it.

12          THE COURT: Simple, but what you are avoiding is  
13 answering my question. My question was, appearance of  
14 conflict verses actual conflict, what do you think the law  
15 is, and where do you think this falls?

16          ATTORNEY DILLON: I think, based on my reading of the  
17 law that controls in this area is that when there is a  
18 public perception of a conflict, then there's an issue  
19 that this Court has to look at, and the standard is the  
20 standard that is layed out in the Young case, the Supreme  
21 Court case that the DA cites in their response brief.

22          THE COURT: Young as in not old?

23          ATTORNEY DILLON: Young as in not old, and I don't  
24 have the cite in front of me.

25          THE COURT: I'll get it.

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1           ATTORNEY DILLON:  It's also in my brief.

2           THE COURT:  Lampl.

3           ATTORNEY DILLON:  Okay.  The DA cites it for the  
4           proposition that, "The standard of neutrality for  
5           prosecutors is not necessarily astringent as those  
6           applicable to judicial or quasi -- judicial offices," and  
7           she is correct, direct quote from Young.

8           It is not astringent, and the Court goes on to say  
9           that the different in treatment is relevant whether a  
10          conflict is found, however, not to it's gravity once  
11          identified.  We may require a stronger showing for a  
12          prosecutor that a judge in order to conclude that a  
13          conflict of interest exists, but once we have drawn that  
14          conclusion we have deemed the prosecutor subject to  
15          influences that undermine confidence that a prosecution  
16          can be conducted in a disinterested fashion.

17          If this is the case we can not have confidence that a  
18          proceeding in which the officer plays the critical role of  
19          preparing and presenting the case for the defendant's  
20          guilt or hear the defendant's recommendation for a charge.

21          And so here is the Supreme Court saying that if the  
22          confidence is undermined, if the Court is saying, what  
23          were you thinking, then the decision is already made,  
24          because if we have a what were you thinking factor that  
25          even if they recommend discharge, and even if they died,



1 and if they go to trial, and even if they win the case,  
2 which we submit will never happen, there it has occurred  
3 in the Young case.

4 The bigger issue here is not whether or not they can  
5 indict him for submitting a false document, they determine  
6 the falsity of all the documents in this case. The issue  
7 here is whether or not they can drag Senator Jones down by  
8 literally releasing to the press that he's a target. This  
9 guy get's \$32,000 dollars. This guy get's a publicly  
10 disclose target letter.

11 THE COURT: You're going a little bit off the -- the  
12 focus here is disqualification, and I'm not quite sure  
13 what you are invoking from the press or who you think said  
14 to the press that someone was a target, maybe other than  
15 you or your client talking to the press, but that's not  
16 what your motion was about. Your motion was about the  
17 decision the District Attorney made to support someone in  
18 her political party --

19 ATTORNEY DILLON: Yes, Your Honor.

20 THE COURT: -- and how that may create, and it does  
21 create the appearance of possible conflict, but is it an  
22 actual conflict, and you are helping me process that maybe  
23 an appearance would be enough, but that is what I need us  
24 to focus on and not your theory that the District  
25 Attorney's office is trying to affect someone's political

1 career as opposed to revelations about someones connection  
2 to a series of events that are particularly controversial  
3 in our society right now might prove problematic for that  
4 political candidate. I can't help that part. Those were  
5 choices that were made. That might elevate that candidate  
6 in the eyes of some. They might not elevate that  
7 candidate in the eyes of many.

8 ATTORNEY DILLON: It may, Your Honor, and with regard  
9 to those facts, Senator Jones was willing to come in and  
10 meet with the prosecutor and sit down and say these are  
11 the facts of the case, under oath and maybe not under  
12 oath, but then they received this carpet bombing of target  
13 letters for everyone who signed the document, it is  
14 suddenly 16 witnesses had the door slammed in their face  
15 because they were told that they less friends of the  
16 investigation or targets.

17 Can we go to the next slide? Mr. Jones received his  
18 target letter on July 6th as the DA indicated. Contrary  
19 to their motion where they indicated he was a potential  
20 target, he was told he was What? Next slide. "You are  
21 advised that you are "A target" of the Grand Jury." This  
22 was on July 6th.

23 Next slide, please. On July the 12th, six days  
24 after, I received this target letter, and I will say that  
25 we consider this to be highly confidential, and the only

1 two people in the world that knew about the target letter  
2 were me and the district Attorney's office. I get this  
3 unsolicited e-mail from a reporter with --

4 ATTORNEY GREEN-CROSS: I'm sorry --

5 THE COURT: Stop.

6 ATTORNEY GREEN-CROSS: I'm sorry. This isn't a  
7 document that I've seen before, so before we publish it,  
8 Mr. Dillon can you --

9 THE COURT: Can you take that down, Ms. Clapp back to  
10 the preceding page? And so, Mr. Dillon, you had assured  
11 me that --

12 ATTORNEY DILLON: Yes, I did, Your Honor, and in my  
13 zeal I got a little ahead of myself.

14 THE COURT: Well, be less zealous. Represent your  
15 client, but let's not slap e-mails for which no foundation  
16 has not been laid upon the screen. I thought you said, in  
17 fact, I know you said don't worry, the actual exhibits I  
18 won't put on the screen, they'll just be in my hands and  
19 they won't be published.

20 ATTORNEY DILLON: I had a carefully drafted script,  
21 and I lost it because we started in the middle of my  
22 argument. May I approach and enter before the Court with  
23 a copy.

24 THE COURT: You may.

25 ATTORNEY GREEN-CROSS: If it's a copy of Defense  
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1 Exhibit 2 then again, there's no foundation. I haven't  
2 seen it before.

3 THE COURT: I'll take it. I won't necessarily make  
4 it a part of the record --

5 ATTORNEY GREEN-CROSS: That was a part of my request.

6 THE COURT: If we're going to have a discussion about  
7 it, I need to be able to see it. Thank you.

8 ATTORNEY DILLON: It's an original and one.

9 THE COURT: All right. Any way. Your representation  
10 is that you previously shared with me what happened in  
11 your life, and in your life a reporter out of the blue  
12 reached out to you and said hey, I heard that your client  
13 is targeted in the District Attorney's investigation?

14 ATTORNEY DILLON: Yes, Your Honor.

15 THE COURT: Well, the special Grand Jury's  
16 investigation. Okay.

17 ATTORNEY DILLON: Three days later this same reporter  
18 broke the story, and we won't publish that either. It's  
19 not an exhibit, and it's on the internet, and we believe  
20 the Court -- we'd love to publish the story.

21 THE COURT: You're free to do that, not through the  
22 Court's zoom.

23 ATTORNEY DILLON: Okay. We'll hold off on that slide  
24 for now, but I will represent to the Court three days  
25 later this same reporter broke that everyone who signed on

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1 the alternate slate of electors and had received a target  
2 letter including Senator Jones.

3 THE COURT: Assuming for a minute that is exactly how  
4 that played out with you and Mr. Isokoff (sp.) where does  
5 that get us actual conflict, apparent conflict -- I  
6 understand where your client is very frustrated by that.  
7 You suggest that, gosh, the only two people on the planet  
8 who should know about it would be the District Attorney  
9 and you.

10 Certainly, it's a whole lot more than that. We know  
11 the District Attorney alone didn't, in fact, write all  
12 these letters by herself. In fact, she didn't sign the  
13 letters. It's on the screen right now. Mr. Wade did, so  
14 the universe has just grown by 50%. It's three people.

15 ATTORNEY DILLON: Right.

16 THE COURT: So somehow -- let me finish. Somehow  
17 word got out and the reporting universe knows about it  
18 now, and it flows as an unwelcomed development for your  
19 client. Actual conflict, appearance for conflict. I need  
20 you to bend it back to what I need to work through, which  
21 is should I take any remedial action to address an actual  
22 conflict or the appearance of conflict, if I have the  
23 authority, that's what we're working through and not the  
24 trials and tribulations of Senator Jones because there was  
25 a leak. Unless you've got proof that it was Charlie

1 Bailey who leaked it, and then now we have --

2 ATTORNEY DILLON: Yes, Your Honor.

3 THE COURT: But we don't have that here.

4 ATTORNEY DILLON: I do not have that. No indication  
5 that Mr. Bailey was involved. All I know is that this  
6 organization knew and I knew, and of course my client  
7 knew, and then six days later this internet reporter  
8 knows, and then shortly after that there's an AJC story  
9 about it. If we could I'd like to publish Exhibit 3,  
10 which is a flyer for it.

11 THE COURT: That's in your pleading.

12 ATTORNEY DILLON: It is.

13 THE COURT: You may -- it's already public record.  
14 Let me make sure the State can look at it, but if it's in  
15 the pleading --

16 ATTORNEY GREEN-CROSS: If it is what's in the  
17 pleading then we don't have an objection to the  
18 authenticity of it.

19 THE COURT: Okay.

20 ATTORNEY DILLON: May I approach, Your Honor.

21 THE COURT: I've got it on my screen. So we have  
22 this fundraiser, and it's a blockbuster headlining Fani  
23 Willis the District Attorney. In fine print you can see  
24 where Mr. Bailey is, in fact, a candidate there, the font  
25 is so small that I have to squint to see what it says.

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1       This occurs about three weeks before the decision is made  
2       to make my client target in this case.

3       The District Attorney, according to publicly  
4       available records, which I have marked as Exhibit 4. This  
5       particular document, Your Honor is from the public  
6       campaign finance website here in Georgia, so this is  
7       publicly available data. It shows during the day of and  
8       during the day after this fundraiser \$32,000 made to the  
9       office of Mr. Bailey. We submit is a direct result of  
10      this fundraiser. I'm told that the custom is, often  
11      people show up with a check or they give their regrets and  
12      sent a check the next day. During this particular  
13      month, Mr. Bailey raised over \$270,000 dollars.

14      THE COURT: So this was a particularly small  
15      fundraiser for him?

16      ATTORNEY DILLON: This might have been a particularly  
17      big one. This might have been the one that caused the  
18      avalanche of checks to come in.

19      THE COURT: Could be for all those people who are  
20      checking the ethics website to see what the cash flow  
21      looking like for the first couple of weeks were, so I'll  
22      put my money behind it.

23      ATTORNEY DILLON: This is the sort of headline  
24      fundraiser that gets people to say, oh, we have a big  
25      wheel. We have somebody who is on the nightly news, as

1       this Court knows, who is pulling for Charlie Bailey.

2           THE COURT:   Okay.

3           ATTORNEY DILLON:   One candidate in the Lieutenant  
4       Governor's office or the Lieutenant Governor's race gets a  
5       headliner, the other one, three weeks later gets a target  
6       letter -- quietly get's a target letter.   Now, there were  
7       numerous news stories speculating about the existence of  
8       target letters on or about the time of the Yahoo news  
9       article, and there was a lot of buzz about that.

10       In fact, there was even an AJC story where DA Wilis  
11       was quoted as saying that numerous attorneys had received  
12       target letters on their behalf.   It didn't name Senator  
13       Jones, fortunately.   In fact, it wasn't publicly known  
14       that Senator Jones received a target letter until the DA  
15       filed their brief two days ago.

16       They were the first people to acknowledge he was a  
17       target for this Grand Jury.   We had never acknowledged  
18       that.   It was a mere speculation in the press, but it's  
19       that sort of thing that gives the DA the the ability to  
20       benefit their friends and harm somebody who is under  
21       investigation, and that is really what we're talking  
22       about.

23       The cases that the DA's point to in their motion from  
24       1916 and 1936 are talking about transactions where the  
25       financial transactions were \$150, and was that materially,

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1       and while those are interesting cases, but once that \$150  
2       was material in the depression, we were talking about  
3       \$30,000 and we're talking about swaying an election, a  
4       statewide election in Georgia, and that's a significant  
5       thing.

6               This is not something that is being done by accident.  
7       This is being done by design. This fundraiser was pointed  
8       at benefiting Senator Jones --

9               THE COURT: Isn't that the purpose of the fundraiser.  
10      I agree -- the point of -- the question is does the  
11      District Attorney decision to support someone with whom  
12      she is politically aligned, it surprises no one that they  
13      are politically aligned. Does that rise to the level of  
14      creating -- an appearance of -- , and I've opined on that  
15      a little bit an actual conflict, and I understand because  
16      you can't climb into someone's mind.

17              You have to do a little of this through the  
18      shadowboxing of, okay -- there is a fundraiser and all of  
19      this money came in, and then there was a target letter.  
20      Do you have more of a connection of one who proceeded the  
21      other?

22              ATTORNEY DILLON: As far as a direct connection?

23              THE COURT: Any connection.

24              ATTORNEY DILLON: What is out there in the press,  
25      what is out there in the ether. A part of Senator Jones'

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1 concern is that this report is going to come out in  
2 October. I'm glad to hear there's no October surprise,  
3 but there's been this whole series of drips, this whole  
4 series of leaks out of the Fulton County DA's office that  
5 have tilted benefit towards Mr. Bailey. It pointed to my  
6 client as being a presumptive violator of the law, and  
7 it's only because the DA has the authority to do that.

8 So if this Court were to determine that she has a  
9 conflict, and this appearance is sufficient, and we go to  
10 the Attorney General's office to appoint a new prosecutor  
11 with regard to Senator Jones who could sit down with him  
12 and say, Well, Senator Jones, we're interested in what  
13 happened in December 2020, would you like to talk to us,  
14 and just like we did on day one, with the DA's office?

15 Certainly, we would be glad to. Do we have a target  
16 letter from your office? No, you do not, Senator Jones,  
17 because we have useful information that would age your  
18 investigation, because this is an investigation when it  
19 was impaneled that was supposed to gather evidence to see  
20 whether or not there was an effort to undermine democracy  
21 in this country, and when Senator Jones said, I have a  
22 subpoena here, I'm going to talk to these people we said,  
23 fine. We prepared our rates, but then we've got this  
24 target letter and then everything changed, just like it  
25 did for these 11 clients.

1           So then where initially they indicated where they  
2           wanted to gather evidence, now it appears that what they  
3           really wanted to do is gather publicity, and they slammed  
4           the door on all 16 witnesses who signed the document by  
5           giving them target letters, and then they announced that  
6           they're all bad people, and in essence they're going to  
7           recommend their charges in this report, if and when it  
8           comes to you desk.

9           THE COURT: So the DA's office doesn't write the  
10          report, the Grand Jury does, just to repeat. You  
11          mentioned something about the District Attorney's office  
12          leaking this and leaking that. Supposition or evidence?

13          ATTORNEY DILLON: I certainly don't know that the  
14          District Attorney's office talked to Yahoo News, but I  
15          know that I was the only other person holding a copy of  
16          that target letter on that day, and there are numerous  
17          daily stories in the AJC, to quote learned sources from  
18          inside the investigation are the people who are conducting  
19          this special Grand Jury.

20          THE COURT: I'm focused on your client, and I'm  
21          asking you to direct me to anything other than the  
22          gentleman from Yahoo who said, I heard X about your client  
23          being a target. has there been other outreach from the  
24          media to you saying, I heard Y, I heard Z about Senator  
25          Jones that you can source only to the District Attorney's

1 office as opposed to, hey, any witness who comes before  
2 that Grand Jury is free to talk to the media afterwards if  
3 he or she wants to.

4 ATTORNEY DILLON: That's absolutely correct, and as  
5 you know, that's how the Grand Jury work.

6 THE COURT: Right.

7 ATTORNEY DILLON: You're supposed to operate in  
8 secrecy, which is what was anticipated when this was  
9 founded, but the witnesses are free to go talk, and some  
10 of the witnesses probably do talk, but certainly Senator  
11 Jones had an interest in the public not knowing that  
12 Fulton County considered him a target, so he did not talk;  
13 we know that.

14 The leak of the existence of this target letter and  
15 subpoena actually, violate the the (unintelligible) of  
16 ethics that the District Attorney operates under, and one  
17 of the things that we have with regard to Exhibit 5 is the  
18 ethics training that the DA's office gives from their  
19 general counsel, Mr. Robert Smith, who is the general  
20 counsel for the Prosecuting Attorney's Counsel of Georgia,  
21 and with permission of the Court I'd like to mark this as  
22 Exhibit 5.

23 ATTORNEY GREEN-CROSS: No objection, Your Honor.

24 ATTORNEY DILLON: I think the District Attorney  
25 offered me an affidavit from Mr. Smith earlier today, so I

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1 think they rely on him as an expert in regard to ethics.

2 THE COURT: Okay.

3 ATTORNEY DILLON: And so at this time I would offer  
4 Exhibit 5 into evidence and request to publish it.

5 THE COURT: Sure.

6 ATTORNEY GREEN-CROSS: Your Honor, I don't object to  
7 the submission of the document -- I can't verify it's  
8 authenticity. If Mr. Dillon is representing to the Court  
9 the source of this information, where he got it, that it's  
10 accurate, true, and complete, and that's probably going to  
11 take care of my objection. I just can't look at it and  
12 know that this is the presentation that Mr. Smith gave.

13 THE COURT: Right. It's too long for you to do that,  
14 just in this setting. Any reason we should be concerned  
15 that this has been altered in any way, or is anything  
16 other than what Mr. Smith presented to this District  
17 Attorney, but presumably all District Attorneys and their  
18 processes?

19 ATTORNEY DILLON: My understanding is that this is  
20 his presentation and he does it periodically and that he  
21 would have done it during the time period that Ms. Willis  
22 was the District Attorney here.

23 THE COURT: Okay.

24 ATTORNEY GREEN-CROSS: Can I ask for a representation  
25 of where you obtained this copy?

1           ATTORNEY DILLON: This was pulled off of the  
2 internet.

3           ATTORNEY GREEN-CROSS: Did you pull it from off of  
4 the internet?

5           ATTORNEY DILLON: Yes, I did.

6           ATTORNEY GREEN-CROSS: Okay. Was it from the PAC  
7 website?

8           ATTORNEY DILLON: You have to have access to the PAC  
9 website to get it.

10          ATTORNEY GREEN-CROSS: And I'm wondering how you got  
11 it.

12          ATTORNEY DILLON: It's out there in the ethers.

13          THE COURT: He got it from Yahoo.

14          ATTORNEY DILLON: I got it from Yahoo.

15          ATTORNEY GREEN-CROSS: I want to kind of thank you  
16 for your candor.

17          ATTORNEY DILLON: Would you like to present it to  
18 your client? She would have attended this training, and  
19 see if it's complete?

20          ATTORNEY GREEN-CROSS: I would like to preserve  
21 publication of the document until I can ascertain whether  
22 it is true, accurate, and complete, because I understand  
23 that it has been sourced to the internet, and that is not  
24 something that I can accept, this authentication.

25          THE COURT: Okay, so it's admitted. I'll take it,  
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1       just don't put it on the screen. I want us to keep moving  
2       forward.

3               ATTORNEY DILLON: Okay. We won't put it on the  
4       screen, but it does quote the rules of professional  
5       responsibility in Georgia, and so, I think those rules are  
6       relevant here, and the fact that the District Attorney's  
7       members and the District Attorney herself receives  
8       training on this on and gets reminded on a periodic basis  
9       of what their responsibilities are for the prosecutors is  
10      relevant.

11              THE COURT: Okay. So are you going to be reminding  
12      her now by reading it?

13              ATTORNEY DILLON: I would love to just read a few  
14      snippets, if I may, Your Honor.

15              THE COURT: If they are truly snippets.

16              ATTORNEY DILLON: "The DA and Assistant DA's should  
17      refrain from making extra judicial comments that have a  
18      substantial likelihood of heightening public condemnation  
19      of the accused." That is rule 3.8.

20              THE COURT: This relates to your theory that there  
21      was a leak that wasn't necessary -- one, we don't know  
22      there was a leak. Two, the District Attorney herself who  
23      is the focus of your concern because of the political  
24      support she has from someone with whom she is politically  
25      aligned, that she somehow has been behind the leak that, I

1       guess would have been behind the leak that your client is  
2       a target, but there is no evidence of that.

3           ATTORNEY DILLON: There was no evidence that my  
4       client was a client was a target until two days ago when  
5       they said it in their reply brief, Your Honor.

6           THE COURT: Okay.

7           ATTORNEY DILLON: And that was not inadvertent. That  
8       came directly from the mouth of the District Attorney's  
9       office, and so we're not talking merely about this runoff.  
10      We're talking about the fact that it is publicly confirmed  
11      that Senator Jones is a target of this Grand Jury.

12          THE COURT: Okay.

13          ATTORNEY DILLON: Irrefutably.

14          THE COURT: So your focus is not on a theory that  
15      would have got out but the confirmation, if you will, in  
16      Ms. Cross's response to your response in your motion to  
17      disqualify?

18          ATTORNEY DILLON: Yes, Your Honor.

19          THE COURT: Okay. I'll let her talk about that.

20          ATTORNEY DILLON: Yes, I understand. That brings us  
21      to the juncture that you pointed out where we began, which  
22      is on one side, we have this headliner and they raised  
23      \$32,000, and on the other side we have this target letter  
24      that they publicly disclosed, and we have these series of  
25      leaks to the press, and this is an effort to sway the



1 outcome of the election for Lieutenant Governor in this  
2 case. It really has nothing to do with whether or not  
3 they ultimately indict Senator Jones or the other group of  
4 11, or anybody in this case, because once the publicity  
5 machine has done it's business, the friends of the  
6 District Attorney have won, and so that is really why  
7 we're here, and so you ask, is there a real conflict here?  
8 It couldn't be more.

9 THE COURT: Okay. Short of disqualification, what do  
10 you view as a remedy? If I conclude that something needs  
11 to be done, and I have the authority to do it, but I don't  
12 think that it's practical or appropriate to say that the  
13 entire District Attorney apparatus for Fulton County has  
14 to unplug from any investigation, questioning of,  
15 exploration of your client's connection to the  
16 interference of the 2020 general election.

17 What do you see as an intermediate -- one would be  
18 for me to say there is an apparent conflict, but I can't  
19 do anything about that, because I can only handle actual  
20 conflicts. Another would be to say either it's an actual  
21 conflict, and I'm going to do something, or I'm going to  
22 go out on a limb and do something even though it's only an  
23 apparent conflict.

24 So if I'm going to do something, but it's not  
25 disqualify the whole office, what is your second most

1       preferable outcome?

2               ATTORNEY DILLON: Well, as the Court is aware, there  
3       are not numerous special Grand Juries of this magnitude to  
4       point to for precedent, so what we suggest in our brief is  
5       that the statutory provision that requires, once there's  
6       a conflict made apparent, that it be referred to Attorney  
7       General Carr's office and he find someone to conduct that  
8       portion of that here independent of this special Grand  
9       Jury, and it can be as simple as finding a District  
10      Attorney that doesn't have to find a good solid democratic  
11      District Attorney somewhere who doesn't have a conflict  
12      and give him the authority to pursue Senator Jones' issue  
13      in this, and we would be glad to sit down with him.

14             We would be glad to sit down with you. We would be  
15      glad to approach this with the same willingness to say  
16      let's get to the bottom of this issue and whether or not  
17      there was a conspiracy to undermine democracy in this  
18      country because that is an important issue, and let's put  
19      the media circus behind us. So let's answer the questions  
20      and forget it affecting this election for Lieutenant  
21      Governor, because there's no way she can keep a hand in  
22      it.

23             THE COURT: She being the District Attorney?

24             ATTORNEY DILLON: She being the District Attorney.

25      Forgive me, Your Honor, and not affect the outcome of this

1 election for Lieutenant Governor.

2 THE COURT: So if Attorney General Carr selected  
3 fictional District Attorney X who had also given \$2,000 to  
4 Charlie Bailey's campaign for Lieutenant Governor --

5 ATTORNEY DILLON: It would not be a problem at all.  
6 It's an ordinary contribution, and it's exactly what  
7 counsel points to. Now, if they had hosted a fundraiser  
8 during the time period that they were investigating  
9 Senator Jones, I might have to go to that judge and talk  
10 about that fundraiser.

11 THE COURT: What if that District Attorney had  
12 already hosted -- the District Attorney is not involved in  
13 that investigation. She hosted a fundraiser two weeks  
14 ago, \$50 grand or even more money than DA Willis, but it's  
15 done. It's over and done with, and I'm not going to do  
16 anymore fundraisers from here on out, because now I've  
17 been tasked with seeing what connection, if any, Senator  
18 Jones had to what was going on in November and December.

19 ATTORNEY DILLON: If every District Attorney in the  
20 whole state had hosted a fundraiser for Mr. Bailey then  
21 that issue might be apparent, but I suspect, giving the  
22 list of good democratic District Attorneys in this state  
23 that we can find somebody who doesn't have a conflict and  
24 hasn't hosted a fundraiser for either one, because  
25 certainly, if somebody that hosted a fundraiser for

1 Senator Jones, the Attorney General shouldn't nominate  
2 that person either. Find somebody who doesn't have a dog  
3 in the hunt. Fani Willis has a dog in this hunt.

4 THE COURT: Got it. Thank you, sir.

5 ATTORNEY DILLON: Thank you, Your Honor. Oh, can we  
6 offer into evidence Exhibits now.

7 ATTORNEY GREEN-CROSS: Actually, I was going to ask  
8 to leave it up.

9 THE COURT: Leave it up? Okay, don't take it down?  
10 Too late. Thank you, Ms. Clapp.

11 ATTORNEY DILLON: Can we offer into evidence 1-5?

12 THE COURT: If there's no objection, 1-5. Was 5 the  
13 one where the province was the internet?

14 ATTORNEY GREEN-CROSS: Yes. I was going to object to  
15 the authenticity. I believe the foundation has been shown  
16 for Exhibit NO. 5, we entered it into evidence so I didn't  
17 object to the Court reviewing it, but I do object to it  
18 being tendered and admitted.

19 THE COURT: Why don't we do this? I will take 1-5,  
20 and then I will give Mr. Dillon to maybe shore up his  
21 sourcing of it, and if, in fact, it is pretty clear that  
22 Smith was the name of -- Mr. Smith's presentation then  
23 I'll add to 5 the other 4. I'll hold on to it, but it  
24 won't become part of the record until either Ms. Cross you  
25 agree to talk to Mr. Dillon a little bit more and we see

1 the source, or we're substituting to you -- someone can  
2 get it off the PACK site.

3 ATTORNEY GREEN-CROSS: I do want to raise objections  
4 to some of the others, but if they're being tendered now  
5 into evidence, Exhibit 1, the letter, I don't have any  
6 objection to that.

7 THE COURT: Okay, 1 is admitted.

8 ATTORNEY GREEN-CROSS: Exhibit No. 2 is the e-mail  
9 that I do have an objection to that being tendered and  
10 accepted into evidence without any providence of it. I do  
11 also object to the relevance of it. There's nothing in  
12 this e-mail that sources any information to the District  
13 Attorney's office insofar as this being offered to show  
14 that the leaks are coming from this side of the table. I  
15 object to the relevance of that, and I don't think it  
16 shows that, and I object to the admission of it into  
17 evidence.

18 THE COURT: Okay.

19 ATTORNEY GREEN-CROSS: No. 3 is the fundraiser flyer  
20 that is up on the screen now, and we don't have any  
21 objection to that being tendered and admitted into  
22 evidence. Exhibit No. 4. Again, I have an objection to  
23 the relevance of this. I don't think it shows what, at  
24 least what's been argued. It's been identified and  
25 offered for the purpose of establishing how much money was

1       raised at the fundraiser, but what the actual document is  
2       or appears to be, based on Mr. Dillon's representation,  
3       and I don't have any reason to doubt it.

4               This is publicly available about how much money was  
5       donated to mr. Bailey campaign during a 2-day period in  
6       this document to the fundraiser, and while w I don't  
7       think that is going, and because of that I don't think  
8       that we have an objection to the ruling.

9               THE COURT: Okay, and then 5 is being conditionally  
10       admitted, provisionally admitted. I'm assuming you can  
11       clear up the source.

12              ATTORNEY GREEN-CROSS: Yes, sir.

13              THE COURT: All right. Anything you want to add, Mr.  
14       Dillon?

15              ATTORNEY DILLON: No, Your Honor.

16              THE COURT: All right. I will admit Exhibits 1 and  
17       3, and then 5 will be provisionally admitted. We'll see  
18       if the loose ends can be tied up there. Last question,  
19       Mr. Dillon, and I'll let you sit down. Beyond the Young  
20       case, is there a case or are there cases you want me to  
21       look at that stand for the proposition that the appearance  
22       of a conflict could be sufficient for a Judge to take any  
23       of the forms of remedial action that you are seeking?

24              ATTORNEY DILLON: Your Honor, I rely on the Davenport  
25       case, and that is a Georgia case.

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1           THE COURT: I don't see it in here. You're free to  
2 rely on it. It didn't manage to make it's way into your  
3 motion.

4           ATTORNEY GREEN-CROSS: It was in mine. It's on page  
5 4.

6           THE COURT: You guys share very well when it comes to  
7 cases.

8           ATTORNEY GREEN-CROSS: The Cite is 170 -- I'm' sorry,  
9 it's 157 Georgia Appeals 704, if that's the case you're  
10 referring to.

11          THE COURT: Okay. Do you agree, Ms. Cross, that that  
12 discusses the Davenport actual vs. apparent conflicts.

13          ATTORNEY GREEN-CROSS: I didn't cite it for that  
14 proposition, and that's not my recollection of discussion  
15 in the case.

16          THE COURT: Okay. I'll look at it anyway.

17          ATTORNEY GREEN-CROSS: Yes, but don't -- yes.

18          ATTORNEY DILLON: Your Honor, I never did get clarity  
19 on the basis for the objection to Exhibit 2, other than  
20 she objected to it.

21          THE COURT: Relevance was one, and I think it was  
22 foundation, although, the recipient, Mr. Dillon, I think  
23 he could authenticate it as receiving it, but I'm not sure  
24 the relevance you suppose that Mr. Isokoff(sp.) theorized  
25 what he did because the District Attorney's office let him

1 know about it, as opposed to the witness from the Grand  
2 Jury or the grand juror.

3 I don't know who's in the circle of discussing who is  
4 going to be a target or not, but you've made your point.  
5 I'm just not going to make it part of the record.

6 ATTORNEY DILLON: Okay, and with regard to Exhibit 4,  
7 the financial fundraising report. We offer that as to Mr.  
8 Bailey's take over the two days, the day of the fundraiser  
9 and the day after, and we submit that it is relevant.

10 THE COURT: Okay. I thought it showed his take for  
11 the whole month.

12 ATTORNEY DILLON: No, no, no, no. It's just a 2-day  
13 period.

14 THE COURT: It is before and after the 14th?

15 ATTORNEY DILLON: It is the day of the 14th and the  
16 day after.

17 THE COURT: And it is publicly available?

18 ATTORNEY DILLON: Yes, it is, Your Honor.

19 THE COURT: All right. I'll admit it.

20 ATTORNEY DILLON: That was Exhibit 4.

21 THE COURT: Yes.

22 ATTORNEY DILLON: May I offer a copy to the Court;  
23 I'm not sure I did that, Your Honor.

24 THE COURT: What you want to make sure is that the  
25 court reporter, ultimately, has them. I've got number 2



1 of -- here when we're done will do that. Just make sure  
2 before you go that our court reporter has 1, 3, and 4, and  
3 5 you're going to hold on to until you and Ms. Cross can  
4 work out if you we're able to put more to the story to  
5 that.

6 ATTORNEY DILLON: Yes, Your Honor.

7 THE COURT: Ms. Cross, your closing thoughts about  
8 disqualification.

9 ATTORNEY GREEN-CROSS: Very brief ones. Your Honor,  
10 we're taking a look now at what has been admitted as Mr.  
11 Jones, Exhibit 3. You'll notice that Mr. Jones is not Mr.  
12 Bailey's opponent at this point in the Lieutenant  
13 Governor's race.

14 If anybody's got a problem, or was the opponent of  
15 Mr. Bailey at that time was Mr. Kwanzaa Hall because at  
16 this point, Mr. Bailey was in a run off election, and he  
17 was very clearly identified as District Attorney Willis  
18 raising money for Mr. Bailey in the runoff fundraiser.

19 THE COURT: It's the largest font on the page. Even  
20 larger than the District Attorney's name.

21 ATTORNEY GREEN-CROSS: I understand, insofar, as  
22 we're talking about appearances. I think that shifts the  
23 focus a little bit. The District Attorney isn't raising  
24 money for the opponent of Senator Jones in giving this  
25 fund raiser, this is prior to Mr. Bailey becoming the

1 actual Lieutenant Governor nominee for his party, so I  
2 want to make that as clear as it can be.

3 THE COURT: When was the runoff election?

4 ATTORNEY GREEN-CROSS: Sometime after June.

5 THE COURT: Good.

6 ATTORNEY GREEN-CROSS: Someone with easier access to  
7 google might be able to -- the last week of June.

8 THE COURT: Late June?

9 ATTORNEY GREEN-CROSS: Late June.

10 THE COURT: All right. Got it.

11 ATTORNEY GREEN-CROSS: Mr. Smith is going to be so  
12 pleased, because he gets another mention. I shared with  
13 Mr. Dillon an affidavit from Mr. Smith, who is actually  
14 general counsel of the prosecuting of Georgia. May I  
15 approach, Your Honor?

16 THE COURT: Yes.

17 ATTORNEY GREEN-CROSS: I've got an original for the  
18 court reporter, but I'll hold onto that until it's been  
19 tendered and amended. This is an affidavit, thank you,  
20 that I shared with Mr. Dillon not long before the hearing  
21 identifying that Mr. Smith is someone who deals with  
22 conflict. He routinely advises District Attorney's as far  
23 as general and other entities to the inquiry about the  
24 legal requirements and that's the legal conflict for  
25 individuals, prosecuting attorneys.

1           He's reviewed the motion, he's reviewed the response,  
2           the motion of Senator Jones, including the runoff  
3           fundraiser flyer that we're still looking at, and he  
4           determined, in fact, in his opinion that it does not a  
5           legal requirement.

6           I'm not suggesting that Mr. Smith's opinion  
7           (undecipherable) the Court's, but insofar as the  
8           individual who routinely advises district attorneys about  
9           these matters, this is the individual who is saying that  
10          there is not an actual conflict. There is also language  
11          in their indicating, of course, that he does advise that  
12          an actual conflict is required, as opposed to the  
13          appearance of one, so we ask that State's Exhibit No. 1 be  
14          admitted.

15          THE COURT: Any objection to State's 1 being  
16          admitted, assuming Jones 5 ultimately get's admitted?

17          ATTORNEY DILLON: Yes, Your Honor. I'm going to  
18          object, subject to Jones 5 being admitted along with this.

19          THE COURT: Okay.

20          ATTORNEY DILLON: I have no reason to doubt the  
21          authenticity of this, but Mr. Smith also trains them on an  
22          ethical (unintelligible) and so we could be back here next  
23          week with a motion for prosecutorial misconduct, which I  
24          won't define, but the ethical rules also apply to the  
25          District Attorney's office, and in the presentation that I

1 provided the Court, he lays out exactly the rules that DA  
2 Willis' office has violated.

3 THE COURT: Okay. Sort out Exhibit 5 soon, so I can  
4 put that alarm on it. I'm going to admit DA 1 or State's  
5 1, but I'd love to see 5. It seems like it ought to come  
6 in. I understand the State's concern.

7 ATTORNEY GREEN-CROSS: I think we can work that out.  
8 There comes a time when the Court considers Senator Jones'  
9 offer of Exhibit No. 5, Mr. Smith's presentation. I  
10 believe at least the excerpt that Mr. Dillon read this  
11 afternoon was a concern or admonishment, or flagging the  
12 extra judicial statements of the District Attorney or  
13 prosecuting entity.

14 You've heard no evidence this afternoon or to my  
15 knowledge in the record anywhere that there has been any  
16 extra judicial statement from the District Attorney's  
17 office about Mr. Jones officer that has played a part in  
18 this.

19 Insofar as the objection this afternoon came to the  
20 identification, apparently, for the first time officially,  
21 that Senator Jones has received a target letter, of course  
22 that was in direct response in the motion to disqualify  
23 that was file by Senator Jones on Friday. They raised in  
24 that motion equal protection and due process claims. They  
25 reference constitutional protections of the Federal and

1 State Constitution, and they are essentially saying, hey,  
2 look what you're doing. You're investigating me, and  
3 you're doing that only because I am a political opponent  
4 of someone you like.

5 That is our whole point to you, that is the whole  
6 thrust of this. Friends get rewarded and enemies get  
7 punished. The fact of the matter is, and what the  
8 District Attorneys represented in that was, no, You're  
9 just like everybody else. You're treated exactly like  
10 everybody else, similarly situated to you, received the  
11 same treatment and you can't show otherwise, and for that  
12 reason the legal standard hasn't been met, so I wanted to  
13 clear that up too.

14 Otherwise, I'm happy to address any concern or  
15 comment further from the Court that I think the motion --  
16 the burden hasn't been satisfied. It is not a legal  
17 conflict here and the motion should be denied after I  
18 consult very briefly with my table.

19 THE COURT: Please consult. Can we take the screen  
20 share down now?

21 ATTORNEY GREEN-CROSS: Yes, and apparently we can  
22 withdraw our objection to Exhibit 5.

23 THE COURT: Great.

24 ATTORNEY GREEN-CROSS: There's no need to go forward.

25 THE COURT: Great. So before you leave, Mr. Dillon,  
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1 make sure a copy gets to our court reporter, but I'd like  
2 a copy of 5 as well.

3 ATTORNEY GREEN-CROSS: I'm handing up the original of  
4 the affidavit of Mr. Smith.

5 THE COURT: Thanks. Mr. Dillon?

6 ATTORNEY DILLON: Very briefly, Judge. Regarding to  
7 the last point raised by the State.

8 THE COURT: Which was?

9 ATTORNEY DILLON: That it is perfectly okay to out  
10 the target letter status of Senator Jones in their  
11 pleading.

12 THE COURT: I didn't hear that it was perfectly  
13 okay. It was an explanation for -- the hand was forced,  
14 and because an argument was made or treated differently.  
15 I didn't hear that it was perfectly okay. I heard that it  
16 was a justification. You don't think it's justified  
17 because?

18 ATTORNEY DILLON: I think they could have made that  
19 argument under (unintelligible) and not further the  
20 appearance that they're favoring Mr. Bailey in trying to  
21 do what? Hold my client up to public ridicule and  
22 increase his shame, and do the things that Mr. Smith's  
23 presentation says they should never do.

24 THE COURT: Ms. Pearson, was there anything you  
25 wanted to add. Your motion with Ms. Deborrough, the

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1 motion to quash and disqualify. I mean your focus was  
2 quashal, and I get that, but you adopted Mr. Dillon and  
3 Ms. Clapp's motion.

4 You've shared with me that Mr. Still is a political  
5 candidate. I appreciate that Mr. Shaeffer is politically  
6 prominent in the Republican party and you said that all of  
7 your client's are active in one way or another. What's  
8 the disqualification argument? They seem to be not in the  
9 same category as Mr. Dillon's client.

10 ATTORNEY PEARSON: Your Honor, I would agree that  
11 Senator Jones has the most direct conflict. In our view  
12 not to ask for more relief than the senator himself has  
13 asked for, in our view that remedy is not sufficient to  
14 address that conflict, and the conflict is exacerbated --  
15 the evidence, by the politicization of our client's cases  
16 and our client's processes.

17 THE COURT: Again, I'll have to have you explain what  
18 you mean by politicization, given that it was your  
19 client's were doing? What is politicization their  
20 politicizing their activity, their political choices,  
21 their connection to a political -- what's politicization  
22 about it. other than talking about that which is  
23 inherently political; I'm not following.

24 ATTORNEY PEARSON: I think it's a great distinction,  
25 Your Honor. We're not talking about -- although we're

1 talking about political things, we're talking about  
2 political motivation by one party against another party,  
3 and to actions taken in one uniform direction against  
4 republican candidates, prominent republican actors --

5 THE COURT: Was there a third group of alternate  
6 democrat electors in case the democrat electors -- I'm not  
7 aware that another group that the special purpose Grand  
8 Jury should be investigating in connection with Republican  
9 efforts to create republican alternate electors and to  
10 challenge the outcome that, at that time, and continues to  
11 show that a democrat won. I was going to press Ms. Cross,  
12 but she didn't go there about partisan, because partisan  
13 has lots of meanings.

14 I don't think that partisan, the case that she cited  
15 was democrat and republican, it was I'm partisan because  
16 I'm trying to get this guy prosecuted. I have a stake in  
17 the outcome of this prosecution. That is not where her  
18 argument went today, but everything about this is  
19 inherently political, because two political parties  
20 collided, someone appears who have won, and folks who  
21 appear to have lost didn't like that outcome and said  
22 appearances can be deceiving and took some steps, and the  
23 question is where those steps legal, and that's the  
24 purpose of this special purpose Grand Jury is  
25 investigating, so it seems to me utterly unremarkable that



1       your clients are all republicans. What would be  
2       remarkable is if they weren't. What's the politicization  
3       because I don't want to miss it if there's a reason to be  
4       concerned, but you're not asking, I'd hope for, we have to  
5       have a Republican District Attorney investigate this  
6       because that's the only way it will be fair.

7           ATTORNEY PEARSON: No, not at all, Your Honor. I  
8       think the process, well, I know Mr. Dillon's motion is  
9       that the Attorney General would be allowed to designate  
10      the replacement, and so we think that should be done,  
11      because I think the appearance of impropriety with Senator  
12      Jones taints the entirety as office of the entire  
13      investigation, not just with regard to him as the remedy  
14      for what I'm trying to say, but you are correct that our  
15      focus was quashal, and that we are joining in that motion  
16      as an add on.

17           I would also say, Your Honor, that just on behalf of  
18      my clients, you asked if there is another slate that they  
19      should be investigating, and I would argue under the  
20      authorities that I put in our motion to the extent we were  
21      contingent electors, and so were the democrats, because  
22      there was a pending judicial challenge that made it joint.

23           And so, yes. The answer to your question is that  
24      both electors were contingent about time contingent on the  
25      judicial outcome which never came.

1           THE COURT: Okay. I appreciate that perspective, but  
2           you did say you are seeking -- I'm paraphrasing you, more  
3           relief or greater relief than Mr. Dillon was seeking, but  
4           then I thought you ended it by saying we want what Mr.  
5           Dillon recommended, which is push for his client, Senator  
6           Jones situation to the Attorney General, and let the  
7           Attorney General decide should I, the Attorney General,  
8           find another District Attorney in her office to see if it  
9           bares having a conversation with Senator Jones, or  
10          investigating, or sending a letter, whatever they choose  
11          to do. What's the difference between that and what you  
12          think I ought to do in terms of disqualification and your  
13          clients?

14          ATTORNEY PEARSON: Your Honor, I think the  
15          disqualification, if there is one, it is disqualification  
16          to the entire investigation, and the disease cannot be  
17          cabin to Senator Jones alone --

18          THE COURT: Okay.

19          ATTORNEY PEARSON: -- because it's still the special  
20          Grand Jury being advised by this District Attorney, and  
21          the report would still be advised by this District  
22          Attorney, and so we don't believe that's a sufficient  
23          cure, and that if there's a disqualification, it should be  
24          from the entire investigation and not just from Senator  
25          Jones.

1 THE COURT: I follow that, and I thank you so much.

2 ATTORNEY DILLON: Just as a suggestion, Judge, and my  
3 learned counsel points to my own brief at page 6. The  
4 Maglocclin(sp.) case, Maglocclin v. Payne indicates that  
5 where the elected District Attorney is totally  
6 disqualified from the case, everybody in the office is.  
7 Here the special grand jury has two focuses.

8 One, the focus of the call between the president and  
9 the Secretary of State's office, and perhaps other  
10 officials that related to finding the votes. That's one  
11 aspect of it, and then there's the other aspect of it that  
12 could be carved off and sent to Mr. Carr's office to say,  
13 let's find a new District Attorney who doesn't have a dog  
14 in this hunt and do an investigation, do a proper  
15 investigation.

16 They can still have this other aspect of it, but a  
17 new District Attorney could come in and look at the  
18 evidence.

19 THE COURT: So without agreeing that there are only  
20 two aspects to what the special purpose Grand Jury is  
21 investigating, your creative idea is if I determine that  
22 there is going to be disqualification, it could be not as  
23 to individuals, but as to subject matter, and so this  
24 question of an alternate slate of electors, if that is  
25 something that needs to be further investigated, create a

1       separate entity to do that, that's not supervised by this  
2       District Attorney?

3             ATTORNEY DILLON: That's correct, Your Honor.

4             THE COURT: Okay, thank you. All right. I think  
5       we've covered everything, but let me find out from Ms.  
6       Cross, Mr. Wade, Mr. Wakeford. Anything else from the  
7       District Attorney's office?

8             ADA WADE: Nothing, Judge. Thank you.

9             THE COURT: Okay. Mr. Dillon or Ms. Clapp, anything  
10      further from Senator Jone's legal team?

11            ATTORNEY DILLON: No, Your Honor.

12            THE COURT: Ms. Pearson, Ms. Deborrough, anything  
13      else from your clients?

14            ATTORNEY PEARSON: No, Your Honor. Thank You.

15            THE COURT: All right. So we're clear, some things  
16      I'll need to memorialize in writing. I am not quashing  
17      the subpoenas. I'm repeating myself, but I will be  
18      issuing an order, a written order on the question of  
19      disqualification, and it will address, not just Mr.  
20      Dillon's client, bur Ms. Pearson and Ms. Deboroughs'  
21      clients as well.

22            I'll probably put in there a little bit about the  
23      timing of the issuance of the report, but I want to make  
24      it clear now in front of everyone what I've heard from the  
25      District Attorney's office as well, there is no plan for a

1 date right now anyway. It's not available. If the way  
2 the investigation flows, insofar as it stays with this  
3 District Attorney's office and the special purpose Grand  
4 Jury, that Grand Jury disgorges it's final report  
5 somewhere near the election, it will not be published and  
6 released until after the election.

7 I'll put that in writing as well, because from my  
8 brief conversation with the grand jurors, just to check in  
9 on their health and well being, they don't have that light  
10 at the end of the tunnel, but things could change, and if  
11 suddenly their work is done I will make sure that there is  
12 a meaningful time buffer between release and election, and  
13 it may well be that we need to publish the plan -- if it's  
14 going to be released. If the report is going to be  
15 released before the election we make sure when that  
16 elected date is, so that if people have concerns or  
17 objections we could file those and we could air that out  
18 before the release.

19 I'd be shocked if there is a report before then. I'm  
20 trying to prime interim report just for me from them on  
21 how things are going. I don't know at all how they do  
22 that, so we'll see how that goes. I appreciate everyone's  
23 time, so with that you are all free to go.

24 (This matter has been adjourned.)  
25

Certificate

STATE OF GEORGIA)

COUNTY OF FULTON)

I, Hadassah J. David, official court reporter in and for the state of Georgia, do hereby certify that I did report and take down the foregoing pages on the 21th day of July 2022, that it is a true, accurate, and complete transcript of the proceedings transcribed herein to the best of my skill and ability. I further certify that the transcript is in conformity with the judicial counsel of georgia and the georgia board of court reporting. I hereby witness my hand and official seal this 15th day of August 2022.

/S/ HADASSAH J. DAVID, CCR

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#4857-8554-6837-1968

FULTON COUNTY SUPERIOR COURT

HADASSAH J. DAVID, OFFICIAL COURT REPORTER

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| <p>ADA GREEN: [1] 51/7<br/> ADA WADE: [15] 4/6<br/> 15/16 15/25 16/7 22/16<br/> 23/3 23/18 24/4 24/17<br/> 24/25 25/12 25/17 26/2<br/> 38/9 92/7<br/> ADA WAKEFORD: [14]<br/> 12/4 12/9 13/18 14/19 15/2<br/> 29/15 30/25 31/5 31/9<br/> 31/14 31/16 34/12 34/17<br/> 36/10<br/> ATTORNEY CLAPP: [1]<br/> 4/22<br/> ATTORNEY DILLON:<br/> [93] 4/15 4/18 5/13 5/21<br/> 5/25 7/1 7/3 7/12 9/17<br/> 10/22 29/20 29/23 30/8<br/> 30/16 30/18 32/1 32/16<br/> 32/20 32/23 33/7 36/20<br/> 44/2 54/6 54/13 54/16<br/> 54/22 54/25 55/15 55/22<br/> 55/25 56/2 57/18 58/7<br/> 59/11 59/19 60/7 60/13<br/> 60/16 60/22 61/14 62/1<br/> 62/3 62/11 62/19 63/15<br/> 63/22 64/2 65/21 65/23<br/> 67/12 68/3 68/6 68/23 69/2<br/> 69/18 69/25 70/4 70/7<br/> 70/11 70/13 70/16 71/2<br/> 71/12 71/15 72/2 72/6<br/> 72/12 72/17 72/19 74/1<br/> 74/23 75/4 75/18 76/4<br/> 76/10 78/14 78/23 79/17<br/> 80/5 80/11 80/14 80/17<br/> 80/19 80/21 81/5 83/16<br/> 83/19 86/5 86/8 86/17 91/1<br/> 92/2 92/10<br/> ATTORNEY<br/> GREEN-CROSS: [53] 4/1<br/> 4/11 42/17 44/4 44/7 44/19<br/> 44/22 45/1 45/14 47/5 49/2<br/> 49/23 50/2 50/9 50/13 51/1<br/> 52/7 52/25 53/5 59/3 59/5</p> | <p>59/24 60/4 62/15 68/22<br/> 69/5 69/23 70/2 70/5 70/9<br/> 70/14 70/19 76/6 76/13<br/> 77/2 77/7 77/18 78/11 79/3<br/> 79/7 79/12 79/16 81/8<br/> 81/20 82/3 82/5 82/8 82/10<br/> 82/16 84/6 85/20 85/23<br/> 86/2<br/> ATTORNEY PEARSON:<br/> [26] 5/4 5/7 17/21 18/7<br/> 18/12 18/24 20/21 21/21<br/> 26/3 26/6 27/16 28/5 29/1<br/> 33/10 33/13 36/17 37/2<br/> 40/4 41/7 41/24 87/9 87/23<br/> 89/6 90/13 90/18 92/13<br/> THE COURT: [189]<br/> \$<br/> \$150 [2] 64/25 65/1<br/> \$2,000 [2] 43/20 75/3<br/> \$270,000 [1] 63/13<br/> \$30,000 [1] 65/3<br/> \$32,000 [5] 9/23 10/5 57/9<br/> 63/8 72/23<br/> \$50 [1] 75/14<br/> /<br/> /S [1] 94/21<br/> 0<br/> 000024 [1] 2/3<br/> 00024 [2] 1/6 1/8<br/> 1<br/> 1-5 [3] 76/11 76/12 76/19<br/> 10 [1] 17/9<br/> 100 [1] 29/25<br/> 10:00 p.m [1] 41/20<br/> 11 [22] 2/11 4/25 11/21<br/> 13/5 13/20 14/15 18/5<br/> 18/13 20/5 23/10 23/24<br/> 26/20 27/2 36/15 37/1 37/1<br/> 40/8 41/15 50/7 50/13<br/> 66/25 73/4<br/> 112 [1] 23/13<br/> 12 [6] 14/16 14/17 15/12</p> | <p>15/16 16/7 38/4<br/> 12th [1] 58/23<br/> 14th [3] 53/8 80/14 80/15<br/> 15 [2] 33/1 33/3<br/> 15-12-100 [1] 29/25<br/> 157 [1] 79/9<br/> 15th [1] 94/16<br/> 16 [2] 58/14 67/4<br/> 170 [1] 79/8<br/> 1916 [1] 64/24<br/> 1936 [1] 64/24<br/> 1968 [2] 1/22 94/24<br/> 2<br/> 2-day [2] 78/5 80/12<br/> 2015 [1] 51/3<br/> 2020 [3] 15/15 66/13 73/16<br/> 2022 [3] 1/12 94/10 94/16<br/> 2022-Ex-000024 [1] 2/3<br/> 2022-EX-00024 [2] 1/6 1/8<br/> 21st of [1] 2/4<br/> 21th [1] 94/10<br/> 22 [8] 2/23 3/1 3/2 3/3 3/5<br/> 3/9 3/10 3/14<br/> 24 [2] 3/2 3/8<br/> 241 [1] 51/2<br/> 25 [1] 1/12<br/> 26th [1] 37/4<br/> 27th [1] 37/4<br/> 28th [1] 37/4<br/> 298 [1] 51/2<br/> 2:00 [1] 2/4<br/> 3<br/> 3.8 [1] 71/19<br/> 30303 [1] 1/12<br/> 4<br/> 4857 [1] 1/22<br/> 4857-8554-6837-1968 [1]<br/> 94/24<br/> 5<br/> 50 [2] 16/1 61/14<br/> 5th [1] 53/9</p> |
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