

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

STATE OF GEORGIA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	CASE NO. 23SC188947
	:	
DONALD JOHN TRUMP,	:	Judge: Scott McAfee
	:	
Defendant.	:	

**MOTION TO ADOPT CO-DEFENDANT CHESEBRO’S MOTION TO  
DISMISS INDICTMENT  
(Supremacy Clause challenge - Counts 1, 9, 11, 13, 15, 17 and 19)**

Pursuant to U.S.C.R. 31.1 and O.C.G.A. § 17-7-110, President Trump hereby adopts the general demurrer<sup>1</sup> timely filed by co-defendant Chesebro as to each count for which they share legal standing. Specifically, President Trump adopts Chesebro’s particularized arguments applying U.S. CONST. Art. VI, Para. 2 to counts one, nine, eleven, thirteen, fifteen, seventeen and nineteen.

WHEREFORER, President Trump respectfully **ADOPTS** the motion to dismiss timely filed by co-defendant Chesebro.

---

<sup>1</sup> Although “magic words are not required to file a demurrer,” State v. Mondor, 306 Ga. 338, 340 (2019), the Supreme Court has held “[a] motion to dismiss for failure to state a claim under OCGA § 9-11-12(b)(6) performs substantially the same function as a general demurrer . . . .” Kimbrough v. State, 300 Ga. 878, 880 (2017).

Respectfully submitted,

Steven H. Sadow  
STEVEN H. SADOW  
Georgia Bar No. 622075  
Lead Counsel for Defendant

260 Peachtree Street, N.W.  
Suite 2502  
Atlanta, Georgia 30303  
404-577-1400  
[stevesadow@gmail.com](mailto:stevesadow@gmail.com)

Jennifer L. Little  
Jennifer L. Little  
Georgia Bar No. 141596  
Counsel for Defendant

400 Galleria Pkwy  
Suite 1920  
Atlanta, Georgia 30339  
404-947-7778  
[jlittle@jllaw.com](mailto:jlittle@jllaw.com)

### **CERTIFICATE OF SERVICE**

I hereby certify I electronically filed the foregoing document with the Clerk of Court using Odyssey Efile Georgia electronic filing system that will send notification of such filing to all parties of record.

This 11<sup>th</sup> day of September, 2023.

/s/ Steven H. Sadow  
STEVEN H. SADOW