

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 CHEELEY’S JOINT GENERAL
AND SPECIAL DEMURRER TO, PLEA IN BAR TO, AND MOTION TO
QUASH THE INDICTMENT**

President Trump hereby adopts the timely challenge to the indictment filed by co-defendant Robert David Cheeley. Specifically, President Trump adopts Cheeley’s particularized arguments that (1) the Electoral Count Act of 1887 preempts the state law allegations—through express, field, and conflict preemption; (2) the First Amendment bars the indictment as an unconstitutional regulation of “core speech;” (3) counts 9, 11, 13, 15, 17, and 19 omit material elements and fail to state violations of the alleged criminal statutes; and (4) the Rule of Lenity and Due Process “fair notice” requirements require dismissal.

(Continued on the next page with signatures)

WHEREFORE, President Trump respectfully **ADOPTS** the joint general and special demurrer, plea in bar, and motion to quash timely filed by co-defendant Cheeley.

Respectfully submitted,

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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 17th day of October, 2023.

/s/ Steven H. Sadow
STEVEN H. SADOW