

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,)
)
vs.) Case No. 23SC188947
)
HARRISON FLOYD)
)
DEFENDANT.)

DEFENDANT HARRISON FLOYD'S PRELIMINARY MOTION TO CHANGE VENUE

COMES NOW, DEFENDANT HARRISON FLOYD, by and through his attorneys of record, who files this preliminary motion for change of venue pursuant to Ga. Code Ann. §17-7-150 (a)(1)(A) (2022) because he contends that he cannot impanel a fair and impartial jury in Fulton County, Georgia, or in the alternative; Defendant Harrison Floyd seeks to have a fair and impartial jury impaneled from Coffee County, Georgia pursuant to Ga. Code Ann. §17-7-150 (a)(3) (2022) on the following grounds:

1.

Defendant Harrison Floyd contends that he cannot impanel a fair and impartial traverse jury in Fulton County, Georgia because of the media coverage, negative governmental press conferences, and the political bias of potential jurors.

2.

Defendant Harrison Floyd is filing this preliminary motion to inform the Court of his intent to seek a change of venue.

3.

Defendant Harrison Floyd has retained experts to study the potential bias caused by the media and governmental entities among potential traverse jurors in Fulton County, Georgia.

4.

Defendant Harrison Floyd has retained experts to study the potential bias among potential traverse jurors in Fulton County, Georgia based upon political affiliation.

5.

Defendant Harrison Floyd further seeks to conduct on going studies on the potential bias of traverse jurors up until the time the trial is conducted.

6.

The initial study will take approximately six (6) weeks to conduct.

7.

Defendant Harrison Floyd would seek to supplement this motion after the initial study concludes.

8.

Under the allegations of the Indictment and Ga. Code Ann. §16-14-11 (2022), which states: “In any criminal proceeding, the crime shall be considered to have been committed in any county in which an incident of racketeering occurred...” The Indictment clearly alleges that acts of racketeering occurred in Coffee County, Georgia in Acts 142, 143, 146, 147, 148, 149, 150, 151, 152, 153, and 155. Hence, Coffee County, Georgia would be a proper, statutory, and constitutional venue to conduct a jury trial or to use as a source of fair and impartial traverse jurors.

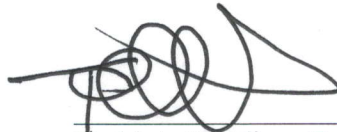
WHEREFORE, DEFENDANT HARRISON FLOYD prays:

- a). that the Court **CONDUCTS** an evidentiary hearing on this motion;
- b). that the Court **GRANTS** this motion to change venue, or in the alternative impanels an impartial traverse jury from Coffee County, Georgia; **AND**

c). For any other relief this Court **DEEMS** just and proper.

Respectfully submitted this the 5th day of January, 2023.

HARDING LAW FIRM, LLC



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Attorneys for Harrison Floyd

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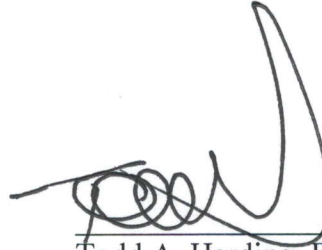
CERTIFICATE OF SERVICE

This is to certify that I have this day served the District Attorney of Fulton County, Georgia a true and correct copy of the **DEFENDANT HARRISON FLOYD'S PRELIMINARY MOTION TO CHANGE VENUE** via electronic transmission through the Odyssey automated system to all counsels of record:

Fani T. Willis, Fulton County DA
136 Pryor St SW
3rd Floor
Atlanta, Georgia 30303

Respectfully submitted this the 5th day of January, 2024.

HARDING LAW FIRM, LLC



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