

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA

v.

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

CASE NO.

23SC188947

**NOTICE OF FILING STATE'S PROPOSED SUPPLEMENTAL EXHIBIT 1
TO THE HEARING ON DEFENDANTS' MOTION TO DISMISS AND DISQUALIFY**

COMES NOW, the State of Georgia, by and through Fulton County District Attorney Fani T. Willis, and files this State's Proposed Supplemental Exhibit 1 to the hearing on Defendants' Motion to Dismiss and Disqualify. Proposed Supplemental Exhibit 1 consists of an affidavit of Stanley Herbert Brody asserting (1) that in April or May 2023 Brody was working at Acumen Wine Gallery in Napa, California; (2) that Brody greeted and met with District Attorney Willis and Special Prosecutor Wade at Acumen Wine Gallery; (3) that Brody exchanged pleasantries, spoke about wine selections, tasted wine, and discussed his profession with District Attorney Willis and

Special Prosecutor Wade; and (4) that District Attorney Willis paid the bill for the tasting with approximately \$400.00 in cash. The affidavit is attached hereto as State's Proposed Supplemental Exhibit 1. Mr. Brody is available to testify at the Court's convenience, and should the Court decline to accept this affidavit, the State respectfully requests that Mr. Brody be permitted to testify at the hearing currently set in this matter for Friday, March 1, 2024, at 1:00 p.m.

Respectfully submitted this 27th day of February 2024,

FANI T. WILLIS
District Attorney
Atlanta Judicial Circuit

/s/ Adam Abbate
Adam Abbate
Georgia Bar No. 516126
Chief Deputy District Attorney
Fulton County District Attorney's Office
136 Pryor Street SW, 3rd Floor
Atlanta, Georgia 30303
adam.abbate@fultoncountyga.gov

State's Proposed Supplemental Exhibit 1.

AFFIDAVIT OF STANLEY HERBERT BRODY

Personally appeared before me, the undersigned officer duly authorized to administer oaths, Stanley Herbert Brody, who after being sworn, deposes and states as follows:

1.

My name is Stanley Herbert Brody. I am over eighteen years of age, under no legal disability, am competent to attest to the matters stated herein and make this affidavit based upon my personal knowledge.

2.

I am a Real Estate Broker and Salesperson involved in the sales of wineries and vineyards within Napa Valley, California.

3.

I have been engaged in the business of wineries and vineyards for 43 years.

4.

I was formerly involved in the business of Acumen Wine Gallery located at 1315 1st St, Napa, California 94559.

5.

Sometime during the dates of April to May of 2023, at approximately 3:00 PM to 4:00 PM (PST), I greeted and met with Mr. Nathan J. Wade and Ms. Fani T. Willis at the Acumen Wine Gallery.

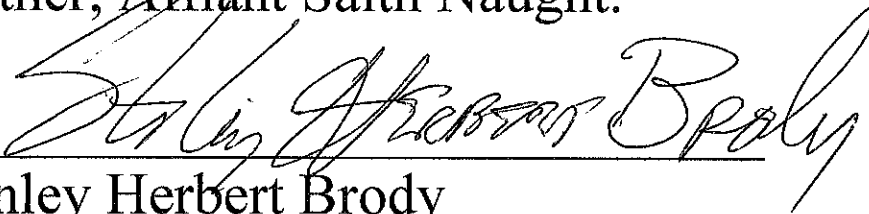
6.

During my encounter with Mr. Wade and Ms. Willis, we exchanged pleasantries, spoke about different wine selections, tasted wine, and discussed our professions. This encounter lasted for approximately 2 ½ hours.

7.

At the conclusion of the tasting, I retrieved the bill and presented it to Mr. Wade and Ms. Willis. Ms. Willis asked for the receipt, reached into her purse, and paid the total of approximately \$400 in cash adding a generous tip. This total included 2 bottles of wine and 1 tasting.

Further, Affiant Saith Naught.



Stanley Herbert Brody

Sworn to and subscribed

Before me this _____ day of _____ 2024

Notary Public

CALIFORNIA JURAT CERTIFICATE

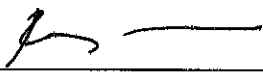
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

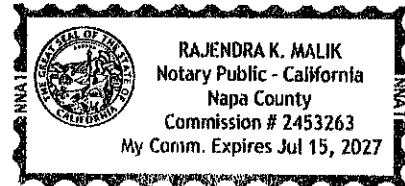
State of California

County of Napa

Subscribed and sworn to (or affirmed) before me on this 26 day of FEBRUARY, 20 24,
by STANLEY HERBERT BRODY

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature  (Seal)



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Defendants.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this NOTICE OF FILING STATE'S PROPOSED SUPPLEMENTAL EXHIBIT 1 TO THE HEARING ON DEFENDANTS' MOTION TO DISMISS AND DISQUALIFY upon all counsel who have entered appearances as counsel of record in this matter via the Fulton County e-filing system.

This 27th day of February 2024,

FANI T. WILLIS
District Attorney
Atlanta Judicial Circuit

/s/ Adam Abbate

Adam Abbate
Georgia Bar No. 516126
Chief Deputy District Attorney
Fulton County District Attorney's Office
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