IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA	
	CASE NO.
v.	
	23SC188947
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.	

STATE'S RESPONSE TO DEFENDANT SHAWN STILL'S GENERAL DEMURRER REGARDING COUNTS 8, 12, 14, AND 18

COMES NOW, the State of Georgia, by and through Fulton County District Attorney Fani T. Willis, and responds in opposition to Defendant Shawn Still's General Demurrer Regarding Counts 8, 12, 14, and 18. The Defendant complains that Counts 8, 14, 12, and 18 are subject to general demurrer because presidential electors are not public officers as that term is used in O.C.G.A. § 16-10-23[1], because the documents he is charged with attempting to file are not documents as that term is used in O.C.G.A. § 16-10-20.1, and because the false statements he is

[1] All citations to the Georgia Code herein reference the 2020 version unless otherwise specified.

charged with making did not concer matters within the jurisdiction of any department or agency of state government as required by O.C.G.A. § 16-10-20. Def.'s Mot. at 5, 10, 14. For the reasons set forth below, all of his general demurrers should be overruled.

As a threshold matter, to the extent that the Defendant seeks to add facts not otherwise apparent on the face of the indictment, his pleading is a void speaking demurrer that "present[s] no question for decision, and should never be sustained." *State v. Givens*, 211 Ga. App 71, 72 (1993). Indeed, "deeply embedded within our case law is the concept that a charging instrument that tracks the statutory language of a criminal offense is sufficient to survive general demurrer." *Tate-Jesurum v. State*, 368 Ga. App. 710, 711 (2023) (citing *State v. Mondor*, 306 Ga. 338, 344 (2019)). If a defendant were to admit to all of the facts alleged in an indictment and be guilty of a crime, the indictment is sufficient to withstand general demurrer. *State v. Cohen*, 302 Ga. 616, 617-18 (2017). Here, each of the challenged counts tracks the appropriate statutory language, and if the Defendant were to admit to all of the facts as alleged, he would be guilty of the crimes charged. That is sufficient to survive general demurrer. The State addresses the remainder of the Defendant's complaints but maintains that, in light of the well-settled tests for general demurrers set forth by our appellate courts, his remaining arguments are irrelevant and should be rejected.

I. Presidential electors are public officers for purposes of O.C.G.A. § 16-10-23, as the office is a creation of law, presidential electors are elected by vote of the people, and their function, duties, and compensation are prescribed by law.

It is a felony offense in Georgia for any person to "falsely hold[] himself out as a peace officer or other public officer or employee with intent to mislead another into believing that he is actually such officer." O.C.G.A. § 16-10-23[2]. The Defendant complains that presidential electors

[2] O.C.G.A. § 16-10-23 was amended in 2022 to explicitly include impersonating an "officer of the court." The version of the statute in place at the time of the offenses alleged in the indictment did not include that amendment.

are not public officers as that term is used in O.C.G.A. § 16-10-23[3], Def.'s Mot. at 5, but his argument is without support and should be rejected. Our appellate courts have construed O.C.G.A. § 16-10-23 broadly, affirming convictions under the statute for defendants impersonating state officers, federal officers, and even officers of fictitious government agencies. *Kennedy v. Carlton*, 294 Ga. 576, 577-79 (2014) (conviction affirmed when defendant impersonated employee of Georgia Division of Family and Children Services); *Libri v. State*, 346 Ga. App. 420, 426-27 (2018) (conviction affirmed when defendant impersonated agent of fictitious "Metro Atlanta Human Trafficking Task Force"); *Garrison v. State*, 276 Ga. App. 243, 243-44 (2005) (conviction affirmed when defendant impersonated an unspecified "federal agent").

Based on these well-reasoned appellate decisions, the Court should reject the Defendant's contention that some rigid rubric exists under Georgia law for determining what is and is not a public officer for purposes of O.C.G.A. § 16-10-23. Such a scheme simply does not exist. The position at issue in this case—the office of presidential elector—is a creation of both constitutional and statutory law; presidential electors are elected by vote of the people as mandated by law; and their function, duties, and compensation are prescribed by law. The conduct of a person who falsely holds himself out as a presidential elector with intent to mislead another into believing that he actually is a presidential elector clearly comes within the purview of O.C.G.A. § 16-10-23.

In Georgia, like in every other state, the office of presidential elector and its public function and duties are creations of both the United States Constitution and state law. The United States Constitution provides that "[e]ach State shall appoint, in such Manner as the Legislature thereof

[3] It must be pointed out that while the Defendant maintains in this pleading that presidential electors are not public officers, he is currently attempting to remove this case to federal court, insisting that his status as a presidential elector nominee—who was never actually elected to that office—entitles him to federal officer removal under 28 U.S.C. § 1442. *See Georgia v. Still*, No. 23-13361, Notice of Appeal (11th Cir. Oct. 6, 2023).

may direct, a Number of Electors, equal to the whole Number of Senators and Representatives to which the State may be entitled in the Congress." U.S. CONST. Art. 2, § 1, cl. 2. In Georgia, the office of presidential elector is specifically created by statute:

> At the November election to be held in the year 1964 and every fourth year thereafter, ***there shall be elected by the electors of this state persons to be known as electors of President and Vice President of the United States*** and referred to in this chapter as presidential electors, equal in number to the whole number of senators and representatives to which this state may be entitled in the Congress of the United States.

O.C.G.A. § 21-2-10[4] (emphasis added). The legally mandated public duties of Georgia's presidential electors, once elected by the people and ascertained as duly elected and qualified by the Governor, are also provided by statute:

> The presidential electors chosen pursuant to Code Section 21-2-10 ***shall assemble at the seat of government*** of this state at 12:00 Noon of the day which is, or may be, directed by the Congress of the United States ***and shall then and there perform the duties required of them by the Constitution and laws of the United States.***

O.C.G.A. § 21-2-11 (emphasis added). The United States Constitution imposes upon presidential electors the duty to meet in their respective states, vote by ballot for president and vice president on behalf of the citizens of their state, tally the numbers of votes received by each candidate for president and vice president, sign and certify those tallies, and transmit them to the seat of the government of the United States, directed to the President of the Senate. U.S. CONST. amend. XII.

Like other public officers in this state, Georgia's presidential electors are entitled by statute to compensation for the discharge of their public duties: "Each presidential elector shall receive from the state treasury the sum of $50.00 for every day spent in traveling to, remaining at, and

[4] The Defendant wrongly asserts that "presidential electors are 'nominated in accordance with the rules' of their party." Def.'s Mot. at 7. The Defendant confuses the selection of presidential elector nominees—which is all he ever was—by a political party with the election of Georgia's duly elected and qualified presidential electors—which he never became—by the people of this state, pursuant to O.C.G.A. § 21-2-10.

returning from the place of meeting … .” O.C.G.A. § 21-2-13. They are also each “entitled to mileage at the rate of 10¢ per mile to and from his or her home.” *Id.* Moreover, the Georgia Election code specifically refers to the “office of presidential elector” in multiple places, *see* O.C.G.A. § 21-2-132(a)[5] and O.C.G.A. § 21-2-132(e)[6], and though not definitive in the context of O.C.G.A. § 16-10-23, the Georgia Election Code’s general definition statute defines “public office” as “every federal, state, county, and municipal office to which persons can be elected by a vote of the electors under the laws of this state.” O.C.G.A. § 21-2-2(30). This clearly includes presidential electors, who must be elected by the people under O.C.G.A. § 21-2-10.

The Georgia Constitution itself recognizes that anyone elected to office in this state, acting on behalf of the people, is a public officer: “All government, of right, originates with the people, is founded upon their will only, and is instituted solely for the good of the whole. Public officers are the trustees and servants of the people and are at all times amenable to them.” GA. CONST. Art. I, § II, para. I. Finally, as described above, appellate decisions concerning violations O.C.G.A. § 16-10-23 broadly approve of the statute’s use in cases involving persons impersonating any officer or employee of government purporting to act by authority of any government office, real or fictitious. Here, where the office of presidential elector is a creation of law, presidential electors are elected by the people as mandated by law, and their public function, duties, and compensation are established by law, presidential electors are public officers as that term is used in O.C.G.A. § 16-10-23. The Defendant’s general demurrer to Count 8 on this ground should be overruled.

---

[5] “The names of nominees of political parties nominated in a primary and the names of nominees of political parties for the *office of presidential elector* shall be placed on the election ballot without their filing the notice of candidacy otherwise required by this Code section.” O.C.G.A. § 21-2-132(a) (emphasis added).

[6] “A nominee of a political party for the *office of presidential elector* when such party has held a national convention and therein nominated candidates for President and Vice President of the United States … .” O.C.G.A. § 21-2-132(3) (emphasis added).

A. The cases cited by the Defendant concerning the definition of "public officer" for purposes of *quo warranto* actions are inapplicable to the definition of "public officer" for purposes of O.C.G.A. § 16-10-23; but even if they did apply, they affirm that presidential electors are public officers.

The Defendant relies on three Georgia cases—*Brown v. Scott*, 266 Ga. 44 (1995), *Morris v. Peters*, 203 Ga. 350 (1948), and *McDuffie v. Perkerson*, 178 Ga. 230 (1933)—in support of his argument that presidential electors are not public officers. Def.'s Mot. at 6. Significantly, none of this cases concern the meaning of "public officer" in the context of violations of O.C.G.A. § 16-10-23. Instead, they examine the meaning of "public officer" in the context of *quo warranto* actions, which "inquire into the right of any person to any public office the duties of which he is in fact discharging." O.C.G.A. § 9-6-60. Based on that distinction alone, the cases are inapplicable here. Still, even if they were applicable, these cases support the conclusion that presidential electors are public officers as the term is used in O.C.G.A. § 16-10-23.

In *Brown*, the Court recognized that, in the context of a *quo warranto* action, a "public officer is any 'individual who has a designation or title given him by law, and who exercises functions concerning the public assigned to him by law … .'" 266 Ga. at 45 (quoting *Smith v. Mueller*, 222 Ga. 186, 187 (1966).[7] "This conclusion is not altered simply because the officer's duties are narrowly confined." *Id.* In that case, juvenile court intake officers were held to be public officers because they have "a title given by law and exercise[] functions concerning the public assigned by law. … *The mere fact that he or she may not be entitled to all of the trappings of public*

[7] Notably, *Brown* cites with approval *Smith & Bondurant v. Meador*, 74 Ga. 416 (1885), which held that notaries public are public officers for purposes of *quo warranto* actions. The Defendant argues that presidential electors are not public officers because public officers must receive a salary for their service. Def.'s Mot. at 6, 8-9. Notaries public do not receive a salary, but they certainly are public officers for purposes of *quo warranto* actions. Moreover, as referenced above, though the dollar amount is low, presidential electors receive a salary as mandated by statute. *See* O.C.G.A. § 21-2-13.

office does not make the office any less public." *Id*. (emphasis added). Similarly, presidential electors have a title given by law, O.C.G.A. § 21-2-10, and exercise functions concerning the public assigned by law. U.S. CONST. amend. XII; O.C.G.A. § 21-2-11 (prescribing when presidential electors must meet and the scope of their duties).

In *Morris*, the Court held that the Chairman of the Georgia State Democratic Executive Committee was not a public officer because a "public office is one created by the Constitution, by some statute, or by municipal ordinance passed in pursuance of legislative authority." 203 Ga. at 356. The Court cited *McDuffie*, 178 Ga. at 235, with approval:

> ***A public office, then, is the right, authority, and duty conferred by law by which for a given period***, either fixed by law or through the pleasure of the creating power of government, ***an individual is invested with some portion of the sovereign functions of the government, to be exercised by him for the benefit of the public. The warrant to exercise powers is conferred***, not by a contract, but ***by the law.*** It finds its source and limitation in some act of expression of governmental power. Oath, salary, operation, scope of duties, are signs of the official status; but no one is essential. ***The essential thing is that in some way or other the officer is identified with the government.***

Morris, 203 Ga. at 357 (emphasis added). The office of presidential elector is created by the United States Constitution and by statute. U.S. CONST. Art. 2, § 1, cl. 2; O.C.G.A. § 21-2-10. Presidential electors are invested with the sovereign government functions of meeting in their respective states, voting by ballot for president and vice president on behalf of the citizens of their state, and transmitting their votes to the seat of the United States government. U.S. CONST. amend. XII; O.C.G.A. § 21-2-11. Their operation, scope of duties, and salary—though admittedly small—are all prescribed by law. *Id.*; O.C.G.A. § 21-2-13. The State maintains that the definition of "public officer" in these cases concerning *quo warranto* actions simply does not apply in the context of O.C.G.A. § 16-10-23, but even if these cases did apply here, they support only one conclusion: presidential electors are public officers as that term is used in O.C.G.A. § 16-10-23.

B. The cases cited by the Defendant from Texas and Utah are inapplicable, as they examine the definition of "public officer" for the purposes of specific provisions of non-Georgia law.

The Defendant further relies on *Lamb v. Tex. Sec'y of State*, 628 S.W.3d 339 (Tex. Ct. App. 2021) and *Markham v. Bennion*, 252 P.2d 539 (Utah 1953), neither of which is applicable. *Lamb* concerned a request under Texas's Public Information Act to obtain the personal email addresses of Texas's 2020 presidential electors. In that case, the Court of Appeals of Texas determined that, for the limited purpose of the TPIA, presidential electors were members of the public, and their personal email addresses were exempt from disclosure. 628 S.W.3d at 346. And in *Markham*, the Supreme Court of Utah specifically held that "[I]t should be noted that ***the question is not whether a presidential elector is a public officer*** but the narrower one of whether they were public officers" in the context of a mandamus action, brought under to a specific provision of Utah law, by plaintiffs seeking placement on the ballot as presidential elector nominees of the Socialist Labor Party. 252 P.2d 541 (emphasis added). By its own language, *Markham* does not concern whether presidential electors are public officers, and it should be disregarded.

C. The Defendant's arguments concerning *ejusdem generis*, *noscitur a sociis*, vagueness, and the application of O.C.G.A. § 16-10-23 to impersonating federal officers are specifically defeated by Georgia caselaw.

Finally, the Defendant argues that canons of statutory construction including *ejusdem generis* and *noscitur a sociis* limit the definition of "public officer" for purposes of O.C.G.A. § 16-10-23 to those positions "consistent with the category of words to which peace officers, officers of the court, and employees" belong, again insisting that public officers must receive a salary from the state of Georgia. Def.'s Mot. at 9. First, it should again be pointed out that the version of O.C.G.A. § 16-10-23 in place at the time of the offenses alleged in the indictment did not include the phrase "officers of the court." Second, multiple Georgia cases defeat the Defendant's argument.

As pointed out above, our appellate courts have affirmed convictions under O.C.G.A. § 16-10-23 for persons impersonating agents with the fictitious "Metro Atlanta Human Trafficking Task Force," *Libri*, 326 Ga. App. at 246-27, and for persons impersonating unspecified "federal agents," *Garrison*, 276 Ga. App. at 243-44. Neither of these impersonated offices could possibly be employed by or receive a salary from the State of Georgia. Moreover, the Georgia Supreme Court affirmed a conviction for a person impersonating a DFCS employee. *Kennedy*, 294 Ga. at 577-79. The definition of public officer as used in O.C.G.A. § 16-10-23 cannot then be limited to peace officers. Finally, *Kennedy* also defeats the Defendant's vagueness argument. The Court held that O.C.G.A. § 16-10-23 "consists of a single sentence" that "forthrightly and plainly states that it applies to *public employees*, as well as *peace and other public officers*." 294 Ga. at 577-78 (emphasis in original). The statute "commands to a person of common intelligence that he or she refrain from" impersonating any public officer or employee. *Id.* at 579.

For these reasons, the Defendant's general demurrer to Count 8 should be overruled.

II. The Defendant's argument that Count 14 is subject to general demurrer because the documents at issue are not "documents" as that term is used in O.C.G.A. § 16-10-20.1 is defeated by the plain meaning of the statutory language.

The Defendant revives a not-unfamiliar argument that the document referenced in Count 14—specifically "a document entitled 'CERTIFICATE OF THE VOTES OF THE 2020 ELECTORS FROM GEORGIA'"—is not a document as that term is used in O.C.G.A. § 16-10-20.1. Def.'s Mot. at 10-11. The Defendant's argument is without merit. The straightforward and unambiguous language of the statute itself defines "document" as:

> ***information that is inscribed on a tangible medium*** or that is stored in an electronic or other medium and is retrievable in perceivable form ***and shall include***, but shall not be limited to, liens, encumbrances, documents of title, instruments relating to a security interest in or title to real or personal property, or ***other records, statements, or representations of fact, law, right, or opinion.***

O.C.G.A. § 16-10-20.1(a) (emphasis added). Where statutory text is "clear and unambiguous," a court must "attribute to the statute its plain meaning, and [the court's] search for statutory meaning is at an end." *Star Residential, LLC v. Hernandez*, 311 Ga. 784, 785 (2021). Here, the language of O.C.G.A. § 16-10-20.1(a) is clear and unambiguous, and the Court must give the statute its plain meaning—that "document" means any "information that is inscribed on a tangible medium." *Id.*; O.C.G.A. § 16-10-20.1(a). That definition obviously encompasses words typed onto paper. Where that language is so clear and unambiguous, the Court need not descend into a "search for statutory meaning" under the canons of *ejusdem generis* or *noscitur a sociis*.

In any case, "the canon of *ejusdem generis* is unhelpful" here. *Warren v. State*, 294 Ga. 589, 591 n. 2 (2014). Under *ejusdem generis*, "when a statute lists 'by name several particular things, and concludes with a general term of enlargement, this latter term is to be construed as being *ejusdem generis* (i.e., of the same kind or class) with the things specifically named, *unless, of course, there is something to show that a wider sense was intended.*'" *Id.* (emphasis added). Here, the statute does not list by name several particular things and does not "conclude[] with a general term of enlargement." Quite the opposite—it *begins* with the broadest definition of "document" and then provides specific examples. Moreover, the broad definition of "document" at the beginning of the statute is clearly "something to show that a wider sense was intended" by the General Assembly. *See id.*

Finally, O.C.G.A. § 16-10-20.1 was amended in 2014 by House Bill No. 985 for the specific purpose of expanding the statute's scope beyond just false liens, false encumbrances, and other such documents. The pre-2014 version criminalized filing

> a false lien or encumbrance in a public record or private record that is generally available to the public against the real or personal property of a public officer or public employee on account of the performance of such public officer or public employee's official duties …

O.C.G.A. § 16-10-20.1 (2013). The current version, in effect at the time of the offenses alleged in the indictment, became effective July 1, 2014. The amendment makes clear that the General Assembly intended expand the scope of O.C.G.A. § 16-10-20.1 to criminalize the filing of false documents of the kind alleged in Count 14.

The Defendant's general demurrer to Count 14 should be overruled.

III. The Defendant's argument that Counts 12 and 18 are subject to general demurrer because the false documents at issue were not within the jurisdiction of a department or agency of government is without support.

The Defendant argues that Counts 12 and 18 are subject to general demurrer because the false documents at issue "do not fall within the jurisdiction of a state department or agency." Def.'s Mot. at 14. His argument is without support. Count 12 concerns the false certificates of vote delivered by the Defendant and his co-conspirators to Georgia Secretary of State Brad Raffensperger and Georgia Governor Briam Kemp. As set forth by federal law in place at the time of the offenses alleged in the indictment, Georgia's presidential electors were required to "make and sign six certificates of all the votes given by them" upon meeting and voting for president and vice president of the United States on December 14, 2020. 3 U.S.C. § 9 (2020). Of the six certificates of vote, Georgia's presidential electors were required to deliver two copies to the Georgia Secretary of State, "one of which shall be held subject to the order of the President of the Senate, the other to be preserved by him for one year and shall be a part of the public records of his office and shall be open to public inspection." 3 U.S.C. § 11 (2020).

Count 18 concerns the false "Notice of Filling Electoral College Vacancy" delivered by the Defendant and his co-conspirators to Secretary Raffensperger and Governor Kemp. As set forth by state law, if any duly elected and qualified presidential elector dies prior to the time for voting or fails to attend voting for any reason, the presidential electors present are required to choose a

replacement by voice vote, and "immediately after such choice the name of the person so chosen shall be transmitted by the presiding officer of the college to the Governor, who shall immediately cause notice of his or her election in writing to be given to such person." O.C.G.A. § 21-2-12. The Governor is then required to "immediately cause notice of his or her election in writing to be given to such person." *Id.*

As prescribed by law, both false documents—one titled "CERTIFICATE OF THE VOTES OF THE 2020 ELECTORS FROM GEORGIA" and one titled "RE: Notice of Filling of Electoral College Vacancy"—were within the jurisdiction of the Georgia Secretary of State and the Governor of Georgia. "Within the jurisdiction" for purposes of O.C.G.A. § 16-10-20 simply means that a government entity has "the authority to act" on a false statement. *Haley v. State*, 289 Ga. 515, 521 (2011). Here, both the Secretary of State and the Governor have statutorily imposed duties to act on Electoral College documents. The Secretary of State is required to maintain the legitimate documents as part of the public record, and the Governor is required to ratify and "cause notice of his or her election in writing to be given to" a replacement presidential elector when a legitimate presidential elector's office is vacated prior to or at the time of Electoral College voting. The Defendant's short-sighted argument related to the Electoral Count Act is meritless. The Electoral Count Act *is the very statute that imposes the relevant duties on the Secretary of State*, and the Electoral Count Act does not under any circumstance nullify the Governor's duties under state law.

The Defendant's general demurrers to Count 12 and 18 should be overruled.

As set forth above, the Defendant's General Demurrer Regarding Counts 8, 12, 14, and 18 is without support and should be overruled.

Respectfully submitted this 29th day of March 2024,

FANI T. WILLIS
District Attorney

Atlanta Judicial Circuit

F. McDonald Wakeford
Georgia Bar No. 414898
Chief Senior Assistant District Attorney
Fulton County District Attorney's Office
136 Pryor Street SW, 3rd Floor
Atlanta, Georgia 30303
fmcdonald.wakeford@fultoncountyga.gov

/s/ John W. "Will" Wooten
John W. "Will" Wooten
Georgia Bar No. 410684
Deputy District Attorney
Fulton County District Attorney's Office
136 Pryor Street SW, 3rd Floor
Atlanta, Georgia 30303
will.wooten@fultoncountyga.gov

Alex Bernick
Georgia Bar No. 730234
Assistant District Attorney
Fulton County District Attorney's Office
136 Pryor Street SW, 3rd Floor
Atlanta, Georgia 30303
alex.bernick@fultoncountyga.gov

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA	
	CASE NO.
v.	
	23SC188947
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.	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this STATE'S RESPONSE TO DEFENDANT SHAWN STILL'S GENERAL DEMURRER REGARDING COUNTS 8, 12, 14, AND 18 upon all counsel who have entered appearances as counsel of record in this matter via the Fulton County e-filing system.

This 29th day of March 2024,

FANI T. WILLIS
District Attorney
Atlanta Judicial Circuit

/s/ John W. "Will" Wooten
John W. "Will" Wooten

Georgia Bar No. 410684
Deputy District Attorney
Fulton County District Attorney's Office
136 Pryor Street SW, 3rd Floor
Atlanta, Georgia 30303
will.wooten@fultoncountyga.gov