

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA



IN RE:)
SPECIAL PURPOSE GRAND JURY)

2022-EX-000024

Judge Robert C. I. McBurney

CERTIFICATE OF MATERIAL WITNESS
PURSUANT TO UNIFORM ACT TO SECURE THE ATTENDANCE
OF WITNESSES FROM WITHOUT THE STATE,
CODIFIED IN THE STATE OF GEORGIA AS
O.C.G.A. § 24-13-90 ET SEQ.

Upon the petition of Fani T. Willis, District Attorney, Atlanta Judicial Circuit, pursuant to the Uniform Act to Secure the Attendance of Witnesses from Without the State, codified at O.C.G.A. § 24-13-90 et seq., the Court issues the following Certificate under seal of this Court, and further says as follows:

1. A Special Purpose Grand Jury investigation commenced in Fulton County, Georgia, by order of this Court on May 2, 2022. *See* Order Impaneling Special Purpose Grand Jury Pursuant to O.C.G.A. § 15-12-100, et seq., “**Exhibit A**”. The Special Purpose Grand Jury is authorized to investigate any and all facts and circumstances relating directly or indirectly to possible attempts to disrupt the lawful administration of the 2020 elections in the State of Georgia. *See* Letter Requesting Special Purpose Grand Jury, “**Exhibit B**”.
2. Based on the representations made by the State in the attached “Petition for Certification of Need for Testimony Before Special Purpose Grand Jury Pursuant to O.C.G.A. § 24-13-90 et seq.”, the Court finds that Jenna Ellis, born November 1,

1984 (hereinafter, “the Witness”), is a necessary and material witness to the Special Purpose Grand Jury investigation. The Court further finds that the Witness currently resides at 2171 Burbank Street, Berthoud, CO 80513.

3. Based on the representations made by the State in the attached “Petition for Certification of Need for Testimony Before Special Purpose Grand Jury Pursuant to O.C.G.A. § 24-13-90 et seq.”, the Court further finds that the Witness was an attorney for the Trump Campaign’s legal efforts seeking to influence the results of the November 2020 election in Georgia and elsewhere. As part of those efforts, on December 3, 2020, the Witness and other individuals known to be associated with both her and the Trump Campaign appeared publicly before the Georgia State Senate at the Georgia State Capitol in Atlanta, Fulton County, Georgia. At that hearing, witnesses provided testimony and documentary evidence purporting to demonstrate the existence of election fraud in multiple Georgia counties during the administration of the November 2020 election. Among the evidence offered by the witnesses was a video recording of election workers at State Farm Arena in Atlanta that purported to show election workers producing “suitcases” of unlawful ballots from unknown sources, outside the view of election poll watchers. Within 24 hours of the December 3, 2020, legislative hearing, the Georgia Secretary of State’s Office debunked the State Farm video and explained that its investigation revealed no voter fraud of any kind had taken place at State Farm Arena. Despite this, the Witness made additional statements claiming widespread voter fraud in Georgia during the November 2020 election. There is evidence that the Witness’s appearance and testimony at the hearing

was part of a multi-state, coordinated plan by the Trump Campaign to influence the results of the November 2020 election in Georgia and elsewhere.

4. Based on the representations made by the State in the attached “Petition for Certification of Need for Testimony Before Special Purpose Grand Jury Pursuant to O.C.G.A. § 24-13-90 et seq.”, the Court further finds that the Witness personally authored at least two legal memoranda to former President Donald Trump and another of his attorneys, Jay Sekulow, advising that Vice President Mike Pence should disregard certified electoral college votes from Georgia and other purportedly “contested” states during the Joint Session of the United States Congress on January 6, 2021. There is evidence that the Witness’s drafting of these legal memoranda was part of a multi-state, coordinated plan by the Trump Campaign to influence the results of the November 2020 election in Georgia and elsewhere.
5. Based on the representations made by the State in the attached “Petition for Certification of Need for Testimony Before Special Purpose Grand Jury Pursuant to O.C.G.A. § 24-13-90 et seq.”, the Court further finds that the Witness, as an attorney for the Trump Campaign’s legal efforts seeking to influence the results of the November 2020 election in Georgia and elsewhere, is a necessary and material witness in this investigation. The Witness possesses unique knowledge concerning the origin of numerous claims of election fraud alleged in legal filings and to the public by the Witness, former President Trump, the Trump Campaign, and other known and unknown individuals. Additionally, the Witness possesses unique knowledge concerning communications between herself, former President Trump, the Trump Campaign, and other known and unknown individuals involved in the multi-

state, coordinated efforts to influence the results of the November 2020 election in Georgia and elsewhere. Finally, the Witness's anticipated testimony is essential in that it is likely to reveal additional sources of information regarding the subject of this investigation.

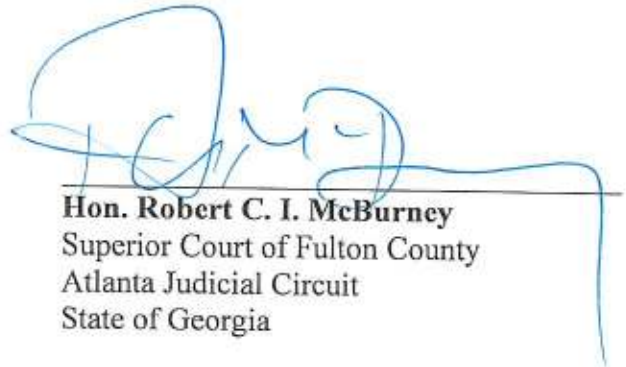
6. The testimony of the Witness will not be cumulative of any other evidence in this matter.
7. The Witness will be required to be in attendance and testify before the Special Purpose Grand Jury on July 12, 2022, and continuing through and until the conclusion of the Witness's testimony on or before August 31, 2022, at the Superior Court of Fulton County, Fulton County Courthouse, 136 Pryor Street, 3rd Floor, Atlanta, Georgia 30303.
8. The Office of the Fulton County District Attorney, in and for the State of Georgia, will pay all reasonable and necessary travel expenses and witness fees required to secure the Witness's attendance and testimony, in accordance with O.C.G.A. §24-13-90 et seq.
9. The Witness protection shall be given protection from arrest and from service of civil or criminal process, both within this State and in any other state through which the Witness may be required to pass in the ordinary course of travel, for any matters which arose before the Witness's entrance into this State and other states, while traveling to and from this Court for the purpose of testifying for this case.
10. The State of Georgia is a participant in a reciprocal program providing for the securing of witnesses to testify in foreign jurisdictions which likewise provide for such methods of securing witnesses to testify in their courts.

11. This Certificate is made for the purpose of being presented to a judge of the Colorado Eighth Judicial District Court, Larimer County, by the District Attorney for the Colorado Eighth Judicial District, or his duly authorized representative, who is proceeding at the request and on behalf of the Office of the Fulton County District Attorney to compel the Witness to be in attendance and testify before the Special Purpose Grand Jury on July 12, 2022, and continuing through and until the conclusion of the Witness's testimony on or before August 31, 2022, at the Superior Court of Fulton County, Fulton County Courthouse, 136 Pryor Street, 3rd Floor, Atlanta, Georgia 30303.

WITNESS MY HAND AND SEAL as a judge of the Superior Court of Fulton County,

Georgia,

This the 15th day of July, 2022.



Hon. Robert C. I. McBurney
Superior Court of Fulton County
Atlanta Judicial Circuit
State of Georgia