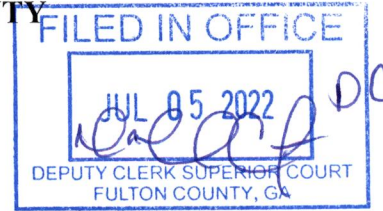


IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA



IN RE: )  
SPECIAL PURPOSE GRAND JURY ) 2022-EX-000024  
)  
) Judge Robert C. I. McBurney  
)

**PETITION FOR CERTIFICATION OF NEED FOR TESTIMONY**  
**BEFORE SPECIAL PURPOSE GRAND JURY**  
**PURSUANT TO O.C.G.A. O.C.G.A. § 24-13-90 ET SEQ.**

COMES NOW the State of Georgia, by and through Fani T. Willis, District Attorney, Atlanta Judicial Circuit, Fulton County, Georgia, and petitions this Honorable Court for a Certificate of Need for Testimony Before Special Purpose Grand Jury, pursuant to O.C.G.A. § 24-13-92 et seq., and in support thereof 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. Jenna Ellis, born November 1, 1984, (hereinafter, “the Witness”) is a necessary and material witness to the Special Purpose Grand Jury investigation. Through both its investigation and through publicly available information, the State has learned 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.

3. Additionally, the Witness personally authored at least two legal memoranda to former President Donald Trump and his attorneys, including attorney 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



















