

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA

v.

DAVID JAMES SHAFER *et al.*

Defendants.

Case No. 23SC188947

**DEFENDANT DAVID J. SHAFER'S NOTICE OF
PROPOSED TESTIMONY**

Defendant David J. Shafer files this Notice of Proposed Testimony and respectfully submits to the Court and the parties that, in the event that the evidence were re-opened regarding the various motions to dismiss or to disqualify the District Attorney for Fulton County Fani T. Willis and/or Special Prosecutor Nathan Wade from the prosecution of this action, that Mr. Shafer would offer the testimony of attorney Cindi Lee Yeager, a Co-Chief Deputy District Attorney for the Cobb County, Georgia, District Attorney's Office.

On Friday, March 1, 2024, Ms. Yeager spoke via telephone with undersigned counsel for Mr. Shafer and Mr. Christopher Anulewicz, counsel for Defendant Robert Cheeley. Following is a summary of the proposed testimony which was provided by Ms. Yeager to counsel for Mr. Shafer and Mr. Cheeley:

- From in or around August of 2023 through January of 2024, Ms. Yeager had numerous, in-person and other conversations with attorney Terence Bradley in which information relating to District Attorney Willis and Mr. Wade was discussed.
- In the course of Mr. Bradley's and Ms. Yeager's discussions, Mr. Bradley told Ms. Yeager the following:

- District Attorney Willis and Mr. Wade met during the 2019 Municipal Court Continuing Legal Education Conference.
- Mr. Wade began his romantic relationship with District Attorney Willis at or around this time.
- Mr. Wade had definitively begun a romantic relationship with Ms. Willis during the time that Ms. Willis was running for District Attorney in 2019 through 2020.
- Mr. Bradley stated that he had personal knowledge of the relationship between Mr. Wade and District Attorney Willis, and included details regarding the use of Ms. Robin Yeartie's apartment and other meetings prior to November 2021.
- Mr. Bradley stated that Mr. Wade personally prepared his own divorce complaint against his spouse, Mrs. Jocelyn Wade, and told Mr. Bradley to sign the divorce filings and to file them on Mr. Wade's behalf. Based upon these statements, it is Ms. Yeager's understanding that Mr. Bradley did not begin representing Mr. Wade until November of 2021.
- In or around September of 2023, Mr. Bradley was visiting Ms. Yeager in her office when Mr. Bradley received a telephone call. Ms. Yeager could hear that the caller was District Attorney Willis. District Attorney Willis was calling Mr. Bradley in response to an article that was published about how much money Mr. Wade and his law partners had been paid in this case. Ms. Yeager heard District Attorney Willis tell Mr. Bradley: **"They are coming after us. You don't need to talk to them about anything about us."**

- Ms. Yeager watched Mr. Bradley's testimony before the Court and became concerned as a result of the fact that what Mr. Bradley testified to on the witness stand was directly contrary to what Mr. Bradley had told Ms. Yeager in person.

Therefore, in the event that the Court re-opens the hearing to receive additional evidence, as requested by the State and Defendant former President Trump, Mr. Shafer requests that the defense be permitted to subpoena Ms. Yeager and present Ms. Yeager's testimony relating to the matters set forth herein.

Respectfully submitted, this 4th day of March, 2024.

/s/ Craig A. Gillen

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CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of March, 2024, filed the foregoing filing with the Court using the Court's Odyssey eFileGa system, serving copies of the filing on all counsel of record in this action, and furthermore have sent a copy of the filing to the parties and the Court.

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