

**BEFORE THE OFFICE OF STATE ADMINISTRATIVE HEARINGS
STATE OF GEORGIA**

DAVID ROWAN,	:	DOCKET NUMBER: 2222582
DONALD GUYATT,	:	2222582-OSAH-SECSTATE-CE-57-Beaudrot
ROBERT RASBURY	:	
RUTH DEMETER,	:	Agency Reference No.: 2222582
DANIEL COOPER,	:	
Petitioners,	:	
v.	:	
	:	
MARJORIE TAYLOR GREENE,	:	
	:	
Respondent.	:	

PETITIONERS’ MOTION TO SUPPLEMENT THE RECORD

Petitioners David Rowan, Donald Guyatt, Robert Rasbury, Ruth Demeter, and Daniel Cooper respectfully move the Court under OSAH Rule 616-1-2-.25 to supplement the record in this matter with newly discovered evidence. That evidence consists of a single text message from Respondent Marjorie Taylor Greene to White House Chief of Staff Mark Meadows on January 17, 2021:

In our private chat with only Members, several are saying the only way to save our Republic is for Trump to call for Marshall law. I don't know on those things. I just wanted you to tell him. They stole this election. We all know. They will destroy our country next. Please tell him to declassify as much as possible so we can go after Biden and anyone else!

Ex. A at 8. The text is among more than 2,300 messages voluntarily disclosed to the House January 6th Committee by Mr. Meadows himself, and it has been widely reported by the national news media.

OSAH Rule 616-1-2-.25 provides as follows:

After the close of the hearing record, but prior to the entry of a Decision, a party may move for an order allowing the introduction of additional

evidence on the basis that such evidence is newly discovered and was not discoverable in the exercise of reasonable diligence at the time of the hearing. If the Court determines that the evidence is newly discovered, and that it may materially impact the case, the Court shall hear and receive such evidence in the manner prescribed for the receipt of evidence by these Rules.

The circumstances here meet that test. The petitioners' motion comes after the hearing but before this Court's decision. The text message is newly discovered in that it only became public on Monday, April 25, in media reports about the texts. The text message could not have been discovered through reasonable diligence because this Court denied the petitioners' efforts to conduct discovery. And, finally, the text message may materially impact the case for at least two reasons.

First, it further undermines Greene's credibility. Greene's testimony at the hearing that she could not remember discussing martial law with anyone was already dubious. This text with President Trump's Chief of Staff makes her testimony even more incredible because it seems like the kind of message with the kind of recipient that a reasonable person testifying truthfully would remember.

Second, the text sheds light on the meaning of her pre-January 6 statements. Eleven days after the failed insurrection, Greene was still fighting against the peaceful transfer of power by advocating extra-legal means. This text, like her statements on January 5, shows the lengths to which she was willing to go to help Mr. Trump remain in power.

Under these circumstances, the Court "shall hear and receive" this evidence for inclusion in the record.

This 26th day of April, 2022.

Respectfully submitted,

/s/ Bryan L. Sells

Bryan L. Sells
Georgia Bar No. 635562
The Law Office of Bryan L. Sells, LLC
Post Office Box 5493
Atlanta, Georgia 31107-0493
Telephone: (404) 480-4212
Email: bryan@bryansellsllaw.com

Ronald Fein*
John C. Bonifaz*
Ben Clements*
Courtney Hostetler*
Benjamin Horton*
FREE SPEECH FOR PEOPLE
1320 Centre St. #405
Newton, MA 02459
(617) 244-0234
rfein@freespeechforpeople.org

Jonathan S. Abady*
Andrew G. Celli, Jr.*
Samuel Shapiro*
Andrew K. Jondahl*
EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP
600 Fifth Avenue, 10th Floor
New York, NY 10020
(212) 763-5000
jabady@ecbawm.com
acelli@ecbawm.com

Attorneys for the Petitioners

* Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2022, I served the foregoing document on the respondent by electronic mail at the following addresses: msiebert@bopplaw.com; jboppjr@aol.com; khilburt@hilburtlaw.com; cgardner@hilbertlaw.com .

/s/ Bryan L. Sells

Bryan L. Sells

Georgia Bar No. 635562

The Law Office of Bryan L. Sells, LLC

Post Office Box 5493

Atlanta, Georgia 31107-0493

Telephone: (404) 480-4212

Email: bryan@bryansellslaw.com

Attorney for the Petitioners



READ: Text messages Sean Hannity, Marjorie Taylor Greene, Ivanka Trump and others sent to Mark Meadows

By CNN

Updated 12:57 PM ET, Mon April 25, 2022

(CNN) — CNN has obtained 2,319 text messages that former President Donald Trump's White House chief of staff Mark Meadows sent and received between Election Day 2020 and President Joe Biden's January 20, 2021 inauguration.

The vast trove of texts, which Meadows selectively provided to the House committee investigating the January 6 attack on the US Capitol, offers the most revealing picture to date of how Trump's inner circle, supporters and Republican lawmakers worked behind the scenes to try to overturn the election results and then reacted to the violence that effort unleashed at the Capitol on January 6.

The never-before-seen texts include messages from Trump's family -- daughter Ivanka Trump, son-in-law Jared Kushner and son Donald Trump Jr. -- as well as White House and campaign officials, Cabinet members, Republican Party leaders, January 6 rally organizers, Rudy Giuliani, "My Pillow Guy" Mike Lindell, Sean Hannity and other Fox hosts. There are also text exchanges with more than 40 current and former Republican members of Congress, including Sen. Ted Cruz of Texas and Reps. Jim Jordan of Ohio, Mo Brooks of Alabama and Marjorie Taylor Greene of Georgia.

The communications below are the messages cited in the story.

Note: CNN has removed personal information from the texts. Errors in spelling and grammar reflect the messages as they were sent, which in some cases include profanity.

Election Day: November 3, 2020

Sean Hannity to Mark Meadows

Hey



NO gonna be OK?

Mark Meadows to Sean Hannity

Stress every vote matters. Get out and vote

Mark Meadows to Sean Hannity

On radio

Sean Hannity to Mark Meadows

Yes sir

Sean Hannity to Mark Meadows

On it. Any place in particular we need a push

Mark Meadows to Sean Hannity

Pennsylvania. NC AZ

Mark Meadows to Sean Hannity

Nevada

Sean Hannity to Mark Meadows

Got it. Everywhere

November 4, 2020

Matt Schlapp to Mark Meadows

Pls get 4 or 5 killers in remaining counts. Need outsiders who will torch the place. Local folks won't do it. Lawyers and operators. Get us in these states. Worried that ronna not in mi.

Mark Meadows to Matt Schlapp

I may need to get you and mercy to go to PA

November 5, 2020

Ivanka Trump to Hope Hicks, Jared Kushner, Mark Meadows, Jason Miller, Dan Scavino and Bill Stepien

You are all WARRIORS of epic proportions! Keep the faith and the fight!

November 6, 2020

Jason Miller to Hope Hicks, Jared Kushner, Mark Meadows, Dan Scavino, Bill Stepien and Ivanka Trump

One other key data point: In 2016, POTUS received 15.5% of the vote in Philadelphia County. 'Today he is currently at 18.3%. 'So he increased from his performance in 2016. In 2016, Philadelphia County made up 11.3% of the total vote in the state. 'As it currently stands, Philadelphia County only makes up 10.2% of the statewide vote tally. So POTUS performed better in a smaller share. Sen. Santorum was just making this point on CNN - cuts hard against the urban vote stealing narrative.

Rep. Andy Biggs to Mark Meadows

glorified Bush as well as the Constitution. And, well highly controversial, it can't be much more controversial than the lunacy that were sitting out there now. And it would be pretty difficult because he would take governors and legislators with collective will and backbone to do that. Is anybody on the team researching and considering lobbying for that?

Mark Meadows to Rep. Andy Biggs

I love it.

November 7, 2020

Rick Perry to Mark Meadows

We have the data driven program that can clearly show where the fraud was committed. This is the silver bullet. "Pam Biondi has seen and agrees!!" Rick Perry

November 13, 2020

Jason Miller to Mark Meadows

Emailed you Dominion backgrounder. Lots there re: functionality problems, not much there on Dem/Soros conspiracy connections. Will defer to you on whether or not to share full report with POTUS. POTUS is clearly hyped up on them, not just from his tweets, but he also called me and Justin separately last night to complain. JM

November 19, 2020

Mark Meadows to Brad Raffensperger

Mr Secretary. Mark Meadows here. If you could give me a brief call at your convenience. Thank you

November 22, 2020

Ginni Thomas to Mark Meadows

Trying to understand the Sidney Powell distancing....

Meadows to Ginni Thomas

She doesn't have anything or at least she won't share it if she does

Ginni Thomas to Meadows

Wow!

December 1, 2020

Bernie Kerik to Mark Meadows

Sir, we are airborne on the way to Michigan from Arizona. We're going to need a hotel for the team and two vehicles to pick us up.

Matt Schlapp to Mark Meadows

Happy to walk ag through our evidence. Its overwhelming.

Jared Kushner to Mark Meadows

<https://leadstories.com/hoax-alert/2020/12/fact-check-video-from-ga-does-not-show-suitcases-filled-with-ballots-pulled-from-under-a-table-after-poll-workers-dismissed.html>

December 5, 2020

Mark Meadows to Brad Raffensperger

mr Secretary. Can you call the White House switchboard at 202 757 6000. For a call. Your voicemail is full

December 9, 2020

Kelli Ward to Mark Meadows

This guy says he's cracked the whole election fraud and wants to speak to someone. I sent his info to Molly Michael a few days ago, but I'm not sure it went anywhere.

December 20, 2020

Mike Lindell to Mark Meadows

Hey Mark, I felt I was suppose to text you this message... You being a man a faith and on the front line of the decisions that are going to be historical! I would ask that you pray for wisdom and discernment from God! You are one of the people the president trusts the most. That being said I want to add my input.... Everything Sidney has said is true! We have to get the machines and everything we already have proves the President won by millions of votes! I have read and not validated yet that you and others talked him out of seizing them... If true .. I pray it is part of a bigger plan... I am grateful that on the night of the election the algorithms of the corrupt machines broke and they realized our president would win in spite of the historical fraud! I look for deviations every day in my business ... when I find one I investigate relentlessly until I know why it happened and how it happened... (this is my gift from God that has made my business so successful) From 11:15 pm on the night of the election I have spent all my time running impossible deviations and numbers from this election... I also was blessed to be able to get info and help Sidney Lin General Flynn and everyone else out there gathering all the massive evidence! I have been sickened by politicians (especially republicans) judges, the media not wanting to see the truth (no matter what the truth would be!) This is the biggest cover up of one of the worst crimes in history! I have spent over a million\$ to help uncover this fraud and used my platform so people can get the word not to give up! The people on both sides have to see the truth and when they do there will not be no civil war , people (including politicians!) are fearing! The only thing any of us should fear is fear of the Lord! Every person on this planet needs to know the truth and see the evidence!!! Mark .. God has his hand in all of this and has put you on the front line... I will continue praying for you to have great wisdom and discernment! Blessings Mike

Mark Meadows to Mike Lindell

Thanks brother. Pray for a miracle

December 21, 2020

Rep. Mo Brooks to Mark Meadows, Unknown

All. Mo Brooks here. Media is contacting my office about this afternoon's White House meeting regarding formulation of our January 6 strategies. Does the White House want me to reply or be mum? Also, it is one thing to discuss (in general terms) our meeting beforehand. It is another to discuss afterwards. If you believe discussion is a positive, I suggest message should be: 1. Progress is being made. 2. More are joining our fight. 3. We can't allow voter fraud & election theft occur if we are going to be a republic. Your choice. Let me know.

Rep. Scott Perry to Mark Meadows

Mark, just checking in as time continues to count down. 11 days to 1/6 and 25 days to inauguration. We gotta get going!

Rep. Scott Perry to Mark Meadows

Mark, you should call Jeff. I just got off the phone with him and he explained to me why the principal deputy won't work especially with the FBI. They will view it as as not having the authority to enforce what needs to be done.

Mark Meadows to Rep. Scott Perry

I got it. I think I understand. Let me work on the deputy position

December 28, 2020

Rep. Scott Perry to Mark Meadows

Did you call Jeff Clark?

December 30, 2020

Rep. Brian Babin to Mark Meadows

Dems and some Republicans may well try to shortstop our objection efforts. Hoping the VP sticks with us.

<https://www.politico.com/news/2020/12/30/electoral-college-biden-trump-452081>

December 31, 2020

Rep. Marjorie Taylor Greene to Mark Meadows

Good morning Mark, I'm here in DC. We have to get organized for the 6th. I would like to meet with Rudy Giuliani again. We didn't get to speak with him long. Also anyone who can help. We are getting a lot of members on board. And we need to lay out the best case for each state. I'll be over at CPI this afternoon.

Jason Miller to Mark Meadows

Assuming you knew this was coming down the pike, but the MSM is going to use this to drive a massive wedge between POTUS 'and everybody else in the party.' He's absolutely going to blow his stack on this if he isn't already aware. Oh boy I don't understand what the VP was thinking here: Pence urges court to throw out lawsuit aiming to help him overturn 2020 election results Politico Kyle Cheney & Josh Gerstein December 31, 2020 ' 6:06 PM

<https://www.politico.com/news/2020/12/31/pence-overturn-election-results-lawsuit-453207>

January 2, 2021

Sen. Ted Cruz to Mark Meadows

Here's the statement:

Sen. Ted Cruz to Mark Meadows

<https://twitter.com/sentedcruz/status/1341410973501059072?s=10>

Mark Meadows to Sen. Ted Cruz

Katrina Pierson to Mark Meadows

Good afternoon, would you mind giving me a call re: this Jan 6th event. Things have gotten crazy and I desperately need some direction. Please

January 3, 2021

Katrina Pierson to Mark Meadows

Scratch that, Caroline Wren has decided to move forward with the original psycho list. Apparently Dan Scavino approved??

Katrina Pierson to Mark Meadows

So, I'm done. I can't be a part of embarrassing POTUS any further.

Katrina Pierson to Mark Meadows

I let her know that I was going to reach out to WH and her tone changed. So, I'll continue to build a proper event.

Mark Meadows to Katrina Pierson

Thank you

January 5, 2021

Rep. Jim Jordan to Mark Meadows

On January 6, 2021, Vice President Mike Pence, as President of the Senate, should call out all electoral votes that he believes are unconstitutional as no electoral votes at all -- in accordance with guidance from founding father Alexander Hamilton and judicial precedence. 'No legislative act,' wrote Alexander Hamilton in Federalist No. 78, 'contrary to the Constitution, can be valid.' 'The court in Hubbard v. Lowe reinforced this truth: "That an unconstitutional statute is not a law at all is a proposition no longer open to discussion.' '226 F. 135, 137 (SDNY 1915), appeal dismissed, 242 U.S. 654 (1916).' Following this rationale, an unconstitutionally appointed elector, like an unconstitutionally enacted statute, is no elector at all.

January 6, 2021

Mark Meadows to Rep. Jim Jordan

I have pushed for this. Not sure it is going to happen

Rep. Marjorie Taylor Greene to Mark Meadows

Mark I was just told there is an active shooter on the first floor of the Capitol Please tell the President to calm people This isn't the way to solve anything

Mick Mulvaney to Mark Meadows

Mark: he needs to stop this, now. Can I do anything to help?

Rep. Barry Loudermilk to Mark Meadows

It's really bad up here on the hill.

Rep. Barry Loudermilk to Mark Meadows

They have breached the Capitol.

Mark Meadows to Rep. Barry Loudermilk

Rep. Barry Loudermilk to Mark Meadows

Thanks. This doesn't help our cause.

Rep. William Timmons to Mark Meadows

The president needs to stop this ASAP

Mark Meadows to Rep. William Timmons

We are doing it

Donald Trump Jr. to Mark Meadows

He's got to condemn this shit. Asap. The captiol police tweet is not enough.

Donald Trump Jr. to Mark Meadows

This his one you go to the mattresses on. They will try to fuck his entire legacy on this if it gets worse.

Reince Priebus to Mark Meadows

TELL THEM TO GO HOME !!!

Jason Miller to Mark Meadows and Dan Scavino

Call me crazy, but ideas for two tweets from POTUS: 1) Bad apples, likely ANTIFA or other crazed leftists, infiltrated today's peaceful protest over the fraudulent vote count. Violence is never acceptable! MAGA supporters embrace our police and the rule of law and should leave the Capitol now! 2) The fake news media who encouraged this summer's violent and radical riots are now trying to blame peaceful and innocent MAGA supporters for violent actions. This isn't who we are! Our people should head home and let the criminals suffer the consequences!

Rep. Marjorie Taylor Greene to Mark Meadows

Mark we don't think these attackers are our people. We think they are Antifa. Dressed like Trump supporters.

Rep. Louie Gohmert to Mark Meadows

Cap Police told me last night they'd been warned that today there'd be a lot of Antifa dressed in red Trump shirts & hats & would likely get violent. Good that Trump denounces violence but could add & well demand justice for those who became violent & well get to the bottom of what group they're with.

Jared Kushner to Mark Meadows, Jason Miller and Dan Scavino

Why don't we post on his Facebook page since he isn't locked out there...

January 7, 2021

Rep. Marjorie Taylor Greene to Mark Meadows

Yesterday was a terrible day. We tried everything we could in our objection to the 6 states. I'm sorry nothing worked. I don't think that President Trump caused the attack on the Capitol. It's not his fault. Antifa was mixed in the crowd and instigated it, and sadly people followed. But when people try everything and no one listens and nothing works, I guess they think they have no other choice. Absolutely no excuse and I fully denounce all of it, but after shut downs all year and a stolen election, people are saying that they have no other choice. I defended Trump last night on Newsmax. He has been the greatest President. I will continue to defend him. And you if anyone attacks you. I hope you are ok. I feel badly for everyone.

Mark Meadows to Rep. Marjorie Greene

Thanks Marjorie

Rep. Andrew Clyde to Mark Meadows

Mark, This is Rep Andrew Clyde GA-09. I would like to pass to POTUS that we are still with him, I believe in him and I want to encourage him. I will do my best to continue to fight for election integrity too. Jody Hice suggested this was a good way to reach President Trump with encouragement. I truly hope he does create a new platform to complete with Twitter and I hope he calls it 'Trumpet' and then we can send out 'notes' to each other! Jennifer and I pray for POTUS daily, and FLOTUS too.

Mark Meadows to Rep. Andrew Clyde

I will share it with him. Thanks Andrew

January 13, 2021

Jason Miller to Mark Meadows, Jared Kushner and Dan Scavino

I tried to walk the President through this earlier but he won't have any of it. 2/3 of the MAGA base wants us to move on. DO YOU BELIEVE THERE WAS ELECTION AND VOTER FRAUD IN THE PRESIDENTIAL ELECTION BETWEEN JOE BIDEN AND DONALD TRUMP BACK IN NOVEMBER? Total: 48 Trump voters: 82 GOP voters: 80 DO YOU THINK THAT THERE WAS ENOUGH ELECTION AND VOTER FRAUD THAT DONALD TRUMP MAY HAVE ACTUALLY WON THE ELECTORAL VOTE TO BE RE-ELECTED AS PRESIDENT? Total: 42 Trump voters: 74 GOP voters: 68 DO YOU AGREE OR DISAGREE WITH THE FOLLOWING STATEMENT? 'THE ELECTION HAS BEEN DECIDED AND PRESIDENT TRUMP SHOULD MOVE ON AND FOCUS ON ENSURING A PEACEFUL AND ORDERLY TRANSITION.' Total: 81 Trump voters: 67 GOP voters: 71

January 17, 2021

Rep. Marjorie Taylor Greene to Mark Meadows

In our private chat with only Members, several are saying the only way to save our Republic is for Trump to call for Marshall law. I don't know on those things. I just wanted you to tell him. They stole this election. We all know. They will destroy our country next. Please tell him to declassify as much as possible so we can go after Biden and anyone else!

January 19, 2021

Sean Hannity to Mark Meadows

<https://twitter.com/therecount/status/1351578348783341571?s=21>

Sean Hannity to Mark Meadows

Well this is as bad as this can get.



TV Channels

Audio

US

World

Politics

Business

Opinion

Health

Entertainment

Tech

Style

Travel

Sports

Videos

Audio

Coupons

Weather

More



FOLLOW CNN POLITICS



