

Exhibit 3

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,)	
)	
v.)	
)	
DONALD JOHN TRUMP, et al.,)	CASE NO.: 23SC188947
)	
Defendants.)	
)	
)	
)	
)	
)	
)	

**CERTIFICATE OF NEED TO SECURE TESTIMONY AND / OR
PRODUCTION OF DOCUMENTS, PURSUANT TO THE UNIFORM ACT TO
SECURE THE ATTENDANCE OF WITNESSES FROM WITHOUT THE
STATE, FROM THE DOJ AND THE NATIONAL ARCHIVES**

Upon the petition of Mark R. Meadows 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 states as follows:

1. The above-styled matter is pending in the Superior Court of Fulton County, Georgia. It has yet to be set for trial. There are several pretrial motions pending, including Defendant Mark R. Meadows’ Motion to Dismiss Based on Supremacy Clause Immunity. Hearings on pending motions remain ongoing.

2. Defendant Meadows is charged with one count of Violation of the Georgia Racketeer Influenced and Corrupt Organizations Act (RICO) and one count of the Georgia Solicitation to Violation of Oath of Office.

3. Based upon the representations made by Defendant Meadows in the attached “Petition for Certificate of Need for Testimony and/or Documents to be Produced,” the Court finds that Colleen Shogan, as the Archivist and a custodian of records of the National Archives and Records Administration (NARA), 700 Pennsylvania Avenue, NW, Washington, DC 20408 United States; and Jack Smith, as Special Counsel and a custodian of records of the Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530, possess material documents to Defendant Meadows’ defenses in the instant case.

4. Based upon the representations made by Defendant Meadows in the attached “Petition for Certificate of Need for Testimony and/or Documents to be Produced,” the Court finds that Ms. Shogan, or any other custodian of records designated by NARA, and Mr. Smith, or any other custodian of records designated by the DOJ, possess official records and other documents (listed in full in Exhibit A and Exhibit B of Meadows’ attached petition).

5. Based upon the representations made by Defendant Meadows in the attached “Petition for Certificate of Need for Testimony and/or Documents to be Produced,” the Court finds that the documents described in Exhibit A and Exhibit B to the Petition are material and directly relevant not only to Defendant Meadows’ defense of

immunity under the Supremacy Clause of the U.S. Constitution, but also to his substantive defenses to the government's charges.

6. Based upon the representations made by Defendant Meadows in the attached "Petition for Certificate of Need for Testimony and/or Documents to be Produced," the Court finds that any in-court testimony of Ms. Shogan, Mr. Smith, or any other designated custodian of records of either NARA or the DOJ would be obviated by a full production of the documents sought by Defendant Meadows in Exhibit A and Exhibit B of his Petition to his counsel of record in this case: James D. Durham, Griffin, Durham, Tanner & Clarkson, LLC, 104 W. State Street, Suite 200, Savannah, Georgia 31401, (912) 867-9141, jdurham@griffindurham.com.

7. The documents will not be cumulative of any other evidence in this matter.

8. Should Ms. Shogan, Mr. Smith or any other NARA or DOJ designated custodian of records desire to testify, rather than producing the documents sought in lieu of testimony, their testimony would not be anticipated to exceed one day.

9. Should testimony become necessary, rather than producing the documents sought in lieu of testimony, Defendant Meadows will pay all reasonable and necessary travel expenses and witness fees required to secure the witness' attendance and testimony, in accordance with O.C.G.A. § 24-13-90 *et seq.*

10. Should testimony become necessary, rather than producing the documents sought in lieu of testimony, Ms. Shogan, Mr. Smith or any other NARA or DOJ designated custodian of records shall be given protection from arrest and from service of civil or criminal process, both within this state and in any other state through

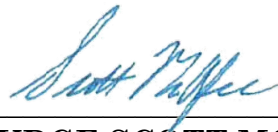
which the witnesses may be required to pass in the ordinary course of travel, for any matters which arose before their entrance into this State and other states, while traveling to and from this Court for the purpose of testifying for this case.

11. The State of Georgia is a participant in a reciprocal process providing for the securing of witnesses to testify in foreign jurisdictions, which likewise provide for such methods of securing witnesses to testify and to produce records in their courts.

12. This Certificate is made for the purpose of being presented to a judge in the Superior Court for the District of Columbia, or any other court of record in the District of Columbia.

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

This, the 13th day of March, 2024.



JUDGE SCOTT MCAFEE
SUPERIOR COURT OF FULTON COUNTY
ATLANTA JUDICIAL CIRCUIT

Prepared and presented by:

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CLARKSON, LLC**

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