

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

State of Georgia

v.

Harrison Floyd, *et al.*

CASE NO. 23SC188947

**THE SECRETARY OF THE STATE OF GEORGIA’S MOTION TO QUASH
OR MODIFY THE SUBPOENA SERVED BY HARRISON FLOYD**

Pursuant to O.C.G.A. § 24-13-23(b), non-party the Secretary of State of Georgia (the “Secretary”) requests the Court quash or modify Defendant Harrison Floyd’s September 12, 2023 Subpoena Duces Tecum” directed to it (the “Subpoena,” attached as Exhibit A). For the reasons explained below, the Subpoena is unreasonable, and compliance with it would represent an undue burden on the Secretary. There is no general right to discovery in criminal cases, a principle especially important for third-party public agencies subject to discovery requests. Even if there were such a general right, this subpoena’s requests are, for the most part, neither specific nor relevant to the defendant’s innocence or guilt. For the most part, the Subpoena is a fishing expedition.

INTRODUCTION

On September 12, 2023, Defendant Harrison Floyd, one of the 19 charged with racketeering and unlawfully attempting to interfere with the outcome of the November 2020 presidential election, served the Secretary with the Subpoena. The Subpoena requested that the Secretary produce documents and materials on October 16, 2023, in response to seven document requests (including multiple subparts): two requests concerning a specific State Election Board

case (No. SEB2020-059) and five general, vague, ambiguous, and non-specific requests for “videos,” “audio recordings,” and “complaints,” much like a civil discovery subpoena:

- 1) A complete and unredacted copy of the SOS Investigative Report [No. SEB2020-059].
- 2) Unredacted copies of any and all documents which relate to or concern the investigation culminating in the SOS Investigative Report [No. SEB2020-059], including but not limited to the following:
 - a. Handwritten or computer notes;
 - b. Emails with original headers;
 - c. Webpage printouts;
 - d. Witness statements whether in affidavit form or hand written;
 - e. Correspondence with the U.S. Department of Justice;
 - f. Correspondence with the Federal Bureau of Investigation;
 - g. Correspondence with the Georgia Bureau of Investigation;
 - h. Correspondence with the State Election Board;
 - i. Correspondence with the Fulton County District Attorney's office; and
 - j. Correspondence with the Georgia Bureau of Investigations.
- 3) Copies of any and all videos of interviews.
- 4) Copies of any and all Audio recordings of interviews conducted by your office.
- 5) Copies of any and all Audio recordings of phone calls conducted by your office.
- 6) Copies of any and all videos and audio recordings produced with the FBI and/or the Georgia Bureau of Investigation.

7) Copies of any and all complaints or investigation reports your agency or department received or conducted and concluded in regard to the November 03, 2020 General Election.

Ex. A. at 2-3.

The Secretary notified Mr. Floyd that it would produce certain documents in response to the Subpoena's more specific requests pertaining to a particular investigation (Nos. 1 and 2), and requested Mr. Floyd withdraw the remaining, general and non-specific document requests (Nos. 3-7). *See* Ex. B, Oct. 12, 2023 Secretary Letter to Floyd. He has not agreed to do so, and therefore, the Secretary requests that the Court quash the remaining requests of the Subpoena (Nos. 3-7) and conclude that that no further response to any request of the Subpoena is necessary. *See* O.C.G.A. § 24-13-23(b). The subpoena is due to be quashed or modified because, besides Subpoena Requests Nos. 1 and 2, the Subpoena is overly broad, generally lacking in a reasonable scope with respect to subject matter or time, and seeks responses to multiple types of overbroad and unbounded requests that Georgia courts have repeatedly quashed, including requests for "any and all documents" in varying mediums without any restriction of subject-matter, time, or any meaningful measure.

LEGAL STANDARD:

There is no General Right to Discovery in a Criminal Matter, Specificity is Required, and the Requesting Party Must Show the Documents' Relevance.

"[I]t is well-settled that 'there is no general constitutional right to discovery in a criminal case.'" *Coleman v. State*, 301 Ga. 720, 726, 804 S.E.2d 24, 30 (2017) (citation omitted).¹ The court, upon written motion made promptly and in any event at or before the time specified in the

¹ Of course, Georgia law requires the prosecution "to turn over evidence in its possession that is material to guilt or punishment and is favorable to the accused." *Bello v. State*, 300 Ga. 682, 683 n.3, 797 S.E.2d 882, 885 n.3 (2017). The Secretary is not the prosecuting agency in this action.

subpoena for compliance therewith, may ... [q]uash or modify [a] subpoena if it is unreasonable and oppressive[.]” O.C.G.A. § 24-13-23(b)(1). Generally, “no court should impose upon the opposite party the onerous task of producing great quantities of documents that have no relevancy.” *Horton v. Huiet*, 113 Ga. App. 166, 169, 147 S.E.2d 669, 672 (1966). And a subpoena “should be specific enough to relate the documents sought to the questions at issue.” *Reese v. State*, 252 Ga. App. 650, 653, 556 S.E.2d 150, 154 (2001). Upon the filing of a motion to quash, the party serving the subpoena then carries the burden of showing that the documents sought are relevant. *Bazemore v. State*, 244 Ga. App. 460, 460, 535 S.E.2d 830, 832 (2000).

ARGUMENT AND AUTHORITIES:

Most of the Subpoena Should be Quashed Because it Constitutes a Fishing Expedition, and the Scope of the Subpoena Should Be Limited to Reasonably Identifiable Documents.

Except for its first two requests, which pertain to an investigative report (the “SEB2020-059 Report”) and investigatory materials related to State Election Board Case No. SEB2020-059,² the Subpoena amounts to a fishing expedition, as evidenced by the remaining requests’ failure to describe what they seek with any particularity, provide any degree of specificity, or even suggest the relevance of the documents sought. *See* Ex. A at 2-3.

² State Election Board Case No. SEB2020-059 concerned alleged malfeasance during the 2020 election at the State Farm Arena in Atlanta. The State Election Board voted on June 20, 2023 to dismiss the case, finding no evidence of a violation of the Georgia Elections Code. The investigative report from State Election Board Case No. SEB2020-059 is available online at the Secretary’s website. *See* Secretary of State of Georgia, Report of Investigation (SEB2020-059), available at <https://sos.ga.gov/sites/default/files/2023-06/SEB2020-059%20ROI%20redacted.pdf> [hereinafter “SEB2020-059 Report”]. The Court may take judicial notice of public records. *See Jaycee Atlanta Dev., LLC v. Providence Bank*, 330 Ga. App. 322, 324, 765 S.E.2d 536, 538 (2014) (noting trial court correctly took judicial notice of information available on a government website); O.C.G.A. § 24-2-201(b) and (e).

As stated, the Secretary has produced the redacted investigatory report pertaining to SEB2020-059, its exhibits (some redacted),³ and non-privileged investigatory materials in its possession, including interview transcriptions, in response to Subpoena Requests Nos. 1 and 2. *See* Ex. B. Requiring any further production of documents in response to those two requests would go beyond what Georgia law requires. For example, Subpoena Request No. 2 seeks “any and all documents which relate to or concern the investigation culminating in the [SEB2020-059 Report].” Ex. A at 2. Georgia appellate courts have recognized that general requests for an entire or complete file are unreasonable and improper because it is “clear that the purpose . . . was not to obtain any specific item of evidence for introduction at trial but rather to enable the [defendant] to search through the . . . records in hopes of obtaining information which might possibly impeach. . . credibility.” *Plante v. State*, 203 Ga. App. 33, 34, 416 S.E.2d 316, 318 (1992).

The need for specificity is “particularly acute” here, as the Secretary’s investigative file pertaining to Case No. No. SEB2020-059 contains confidential and privileged materials on loan from the FBI and GBI, who assisted in the underlying investigation. *See In re Frost*, 366 Ga. App. 45, 49, 880 S.E.2d 650, 654 (2022) (quoting *Plante*, 203 Ga. App. at 34, 416 S.E.2d at 318) (“The need for specificity is particularly acute where, as here, the records sought by the subpoena necessarily would contain confidential and privileged communications....”). The Subpoena’s discovery-like nature is further evident from its remaining document requests because it does not specifically identify and seek another document or item in the Secretary’s possession. Indeed, the Subpoena requests the Secretary produce “any and all” copies of certain types of materials in its

³ The SEB2020-059 Report and certain exhibits were redacted pursuant to O.C.G.A. § 50-18-72 to protect personal identifying information and confidential investigatory information and to preserve investigatory privilege. The redacted information includes investigatory information that the Secretary received on loan from the FBI, and the FBI requires that this information remain confidential.

possession, such as audio recordings and videos relating to unspecified phone calls and interviews, untethered to any specifically-identified investigation. *See* Ex. A at 2-3. As it stands, the Subpoena’s requests for a publicly available report, exhibits, and related investigative materials where the Fulton County District Attorney is required to turn over all exculpatory materials to Mr. Floyd renders the Subpoena “a transparent attempt at discovery” due to be quashed. *Plante*, 203 Ga. App. at 34, 416 S.E.2d at 318.

In addition to the lack of specificity, there is no obvious relevance between Mr. Floyd’s defenses and the remaining subpoena requests (Nos. 3-7) other than an apparent desire to fish around for “any and all” materials the Secretary possesses. The Subpoena’s remaining requests, on their face, make it clear that Mr. Floyd cannot demonstrate their relevance. In particular, Subpoena Requests Nos. 3-6 seek blanket productions of “any and all” documents in varying mediums without even pretending to narrow these requests temporally, by subject matter, or by any other measure:

3. Copies of any and all videos of interviews.
4. Copies of any and all Audio recordings of interviews conducted by your office.
5. Copies of any and all Audio recordings of phone calls conducted by your office.
6. Copies of any and all videos and audio recordings produced with the FBI and/or the Georgia Bureau of Investigation.

Ex. A at 2-3. In response to the Secretary’s request that Mr. Floyd withdraw Subpoena Requests Nos. 3-7, Mr. Floyd proposed “amending” Subpoena Requests Nos. 3-6 to limit their scope to the November 2020 general election (a distinction without meaning, as explained below):

3. Copies of any and all videos of interviews your agency or department received or conducted and concluded concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.
4. Copies of any and all audio recordings of interviews your agency or department received or conducted and concluded concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.
5. Copies of any and all audio recordings of phone calls your agency or department received or conducted and concluded concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.
6. Copies of any and all videos and audio recordings your agency or department received or conducted and concluded in conjunction with the Georgia Bureau of Investigations of Federal Bureau of Investigations concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.

Ex. C., Oct. 13, 2023 Floyd Letter to the Secretary. In response, the Secretary informed Mr. Floyd that it did not have materials responsive to Subpoena Request No. 3, even as “amended,” and that his proposed amendments to Requests Nos. 3-7 were not meaningful. *See* Ex. D, Oct. 13, 2023 Secretary Response Letter to Floyd.

The original and proposed amended requests’ lack of specificity—and lack of indicia of relevance—render these subpoena requests unreasonable. *Reese*, 252 Ga. App. at 653, 556 S.E.2d at 154. Similarly, Subpoena Request No. 7, originally requesting “[c]opies of any and all complaints or investigation reports your agency or department received or conducted and concluded in regard to the November 03, 2020 General Election,” and proposed to be amended to request “[c]opies of any and all complaints or investigation reports your agency or department received or conducted and concluded concerning or pertaining to alleged election fraud in the November 03, 2020 General Election, is no better than Nos. 3-6 and is exactly of the type repeatedly found objectionable by Georgia courts. Ex. A at 3; Ex. C at 2. The materials sought under Subpoena Request No. 3-7—both original and as proposed—have no obvious relevance to

Mr. Floyd's guilt or innocence, and a "general assertion that something in the file[s] might be exculpatory" is insufficient to establish relevance. *Wise v. State*, 321 Ga. App. 39, 47, 740 S.E.2d 850, 857 (2013).

More specifically, Georgia courts have repeatedly affirmed denials of attempts to subpoena entities using such broad requests like Subpoena Requests, No. 3-7 (original and proposed amended), including, for example, requests for "all" reports completed by a law enforcement agency in the timeframe surrounding the defendant's arrest. *Taylor v. State*, 172 Ga. App. 827, 827, 324 S.E.2d 788, 789 (1984). Such broad requests do not seek materials relating to potential defenses, and, without specific identification of the items that are sought, amount to a fishing expedition. *Id.* (affirming order quashing subpoena seeking production of arresting officer's reports of other DUI suspects for credibility purposes) ("it was to be a fishing expedition and [defendant] did not know what he hoped to find therein, except his own complaint against the officer"); *see also Williams v. State*, 251 Ga. 749, 797, 312 S.E.2d 40, 80 (1983) (affirming order quashing subpoena for records related to any cases involving African American children reported missing or found dead of certain ages "from January 1, 1981 to present" in a murder trial); *Tuttle v. State*, 232 Ga. App. 530, 532, 502 S.E.2d 355, 358 (1998) (affirming order quashing subpoena for reports of other arrests by the arresting officer).

Therefore, in their current and proposed amended forms, Subpoena Requests No. 3-7 are a collection of overbroad, non-specific requests that would, if enforced, place an unreasonable burden on The Secretary. To illustrate this burden, the Secretary opened investigations into 296 complaints in 2020 related to the 2020 primaries and general election. The Secretary has continued to receive complaints related to the 2020 presidential election for the past several years, many of which have been investigated or are currently pending presentation to the State Election Board. It

would be an evident and undue burden to require the Secretary to gather materials related to hundreds of investigations, review and redact the records for confidential information (including voter information), and produce all of them. Such an undertaking would require months of work from the Secretary staff, during the time when the Secretary needs to dedicate its limited resources to preparing for the 2024 election cycle. There is no justification for imposing such an oppressive burden on the Secretary, especially because those materials would have no relevance to Mr. Floyd's innocence or guilt.

This type of burden is what O.C.G.A. § 24-13-23(b)(1) seeks to avoid, especially where the subpoena requests are not specific, have no evident relevance to Mr. Floyd's innocence or guilt, or constitute the types of discovery-type fishing trips that Georgia appellate courts have repeatedly sunk. *Williams*, 251 Ga. at 797, 312 S.E.2d at 80; *Reese*, 252 Ga. App. at 653, 556 S.E.2d at 154; *Plante*, 203 Ga. App. at 34, 416 S.E.2d at 318; *Taylor*, 172 Ga. App. at 827, 324 S.E.2d at 789.⁴

Accordingly, the Secretary requests that the Court quash Requests Nos. 3-7 of the Subpoena and modify the Subpoena to limit the Secretary's obligation to respond to the materials that were specifically identified in Subpoena Requests Nos. 1 and 2 and that the Secretary produced (*i.e.*, materials relating to Case No. SEB2020-059).

CONCLUSION

For the reasons stated above, the Court should quash the majority of Mr. Floyd's subpoena to the Secretary of State of Georgia because it constitutes impermissible discovery in a criminal

⁴ With Subpoena Requests Nos. 3-7 in particular, Mr. Floyd seeks even to go beyond the reciprocal discovery he is afforded under Georgia law (*e.g.*, *Brady v. Maryland*, 373 U.S. 83 (1963) and O.C.G.A. § 17-16-1, *et seq.*, which would not apply to the Secretary because it is not the prosecuting agency).

matter. Correspondingly, the Court should modify Mr. Floyd's subpoena and limit the Secretary's obligation to respond to the Subpoena to the materials identified above, which have been produced.

Dated: October 14, 2023

Respectfully submitted,

/s/Jackson R. Sharman, III

One of the Attorneys for the
Secretary of State of Georgia

OF COUNSEL

Jackson R. Sharman, III (Ga. Bar No. 637930)

jsharman@lightfootlaw.com

Amaobi J. Enyinnia (Ga. Bar No. 327957)

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LIGHTFOOT, FRANKLIN & WHITE, LLC

The Clark Building

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Birmingham, Alabama 35203

205-581-0700

205-581-0799 (fax)

Counsel for The Secretary of State of Georgia

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2023, I filed the foregoing using the Court's Odyssey eFileGA system, which will automatically send email notifications of such filing to all counsel and parties of record.

/s/ Jackson R. Sharman, III

OF COUNSEL

EXHIBIT A

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

STATE OF GEORGIA,)	
)	
vs.)	Case No. <u>23SC188947</u>
)	
HARRISON FLOYD)	
)	
DEFENDANT.)	

SUBPOENA DUCES TECUM

TO: RETURN RECEIPT REQUESTED NO.: 7022 1670 0001 8142 2869
Office of the Georgia Secretary of State
Investigation Division
Attn.: Custodian of Records
214 State Capitol
Atlanta, Georgia 30334

YOU ARE HEREBY COMMANDED:

That laying all other business aside, you are commanded to be at and appear at the Harding Law Firm, LLC located at: 113 E. Solomon Street, Griffin, Georgia 30223, on October 16, 2023, at 10:00 a.m., and to bring with you into said law firm certain matters to be used as evidence in the matter of: **State of Georgia v. Harrison Floyd, Fulton County State Court Case No.: 23SC188947.**

You are required to produce any and all unredacted and unedited original items listed below that are in your possession or are under your custody or control pursuant to O.G.C.A. § 24-13-23:

DEFINITIONS

“Document” means any writing or electronically stored information stored in any medium from which information can be obtained, including but not limited to, emails, handwritten notes, computer generated notes, drawings, graphs, charts, photographs, web page printouts, sound recordings, video recordings, images, or other data or data compilations.

“SOS Investigative Report” means the investigative report issued by the Investigations Division on March 7, 2023, that was authored by Gilbert C. Humes and entitled, Fulton County-Poll Worker Fraud under SEB Case number SEB2020-059.

ITEMS TO BE PRODUCED

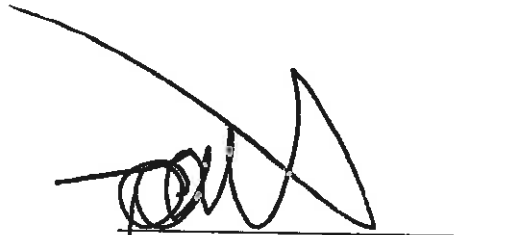
- 1) A complete and unredacted copy of the SOS Investigative Report.
- 2) Unredacted copies of any and all documents which relate to or concern the investigation culminating in the SOS Investigative Report, including but not limited to the following:
 - a. Handwritten or computer notes;
 - b. Emails with original headers;
 - c. Webpage printouts;
 - d. Witness statements whether in affidavit form or hand written;
 - e. Correspondence with the U.S. Department of Justice;
 - f. Correspondence with the Federal Bureau of Investigation;
 - g. Correspondence with the Georgia Bureau of Investigation;
 - h. Correspondence with the State Election Board;
 - i. Correspondence with the Fulton County District Attorney’s office; and
 - j. Correspondence with the Georgia Bureau of Investigations.
- 3) Copies of any and all videos of interviews.
- 4) Copies of any and all Audio recordings of interviews conducted by your office.
- 5) Copies of any and all Audio recordings of phone calls conducted by your office.
- 6) Copies of any and all videos and audio recordings produced with the FBI and/or the Georgia Bureau of Investigation.

7) Copies of any and all complaints or investigation reports your agency or department received or conducted and concluded in regard to the November 03, 2020 General Election.

HEREIN FAIL NOT, under the penalty of Law and Contempt of said Court, this the 12th day of September, 2023.

Respectfully submitted this the 12th day of September, 2023

HARDING LAW FIRM, LLC

A handwritten signature in black ink, appearing to read 'Todd Harding', is written over a horizontal line. The signature is stylized and cursive.

Todd Harding, For the Firm
Ga. Bar No.: 101562
Attorney for Harrison Floyd

Harding Law Firm, LLC
Attorneys at Law
113 E. Solomon Street
Griffin, Georgia 30223
(770)229-4578
(770) 288-9111 facsimile

EXHIBIT B



Jackson R. Sharman III
Lightfoot, Franklin & White LLC
205.581.0789 direct
jsharman@lightfootlaw.com

12 October 2023

VIA EMAIL

Todd A. Harding, Esq.
The Harding Law Firm
113 E. Solomon Street
Griffin, GA 30223
kamikazehitman@comcast.net

*Re: Subpoena to the Secretary of State of Georgia
State v. Floyd, et al.
Superior Court of Fulton County, Georgia
Case No. 23SC188947*

Dear Mr. Harding:

We represent the Secretary of State of Georgia (the “Secretary”) in the referenced matter. We have received and reviewed your September 12, 2023 subpoena duces tecum directed to the Secretary.

For the most part, the requests for documents in the subpoena are overbroad, neither specific nor relevant, or seek material protected by privileges. Requests Number 1 and 2, however, are specific, relevant, and seek material not privileged. In the body of the email transmitting this letter, you will find a ShareFile link to access documents responsive to those two requests. If you have trouble opening the link or downloading the materials, please let us know.

With regard to the remaining requests, we respectfully ask that you reconsider those requests and withdraw them.

If they are not withdrawn, we will file a motion to quash by the end of the day on Monday.

With best wishes, I am,

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jackson R. Sharman III".

Jackson R. Sharman III

cc: Amaobi Enyinnia, Esq.

The Clark Building | 400 20th Street North | Birmingham, AL 35203 | lightfootlaw.com

BIRMINGHAM | HOUSTON

EXHIBIT C



Harding Law Firm, LLC

Todd A. Harding, Attorney at Law

113 E. Solomon Street

Griffin, Ga. 30223

T. 770-229-4578

F. 770-228-9111

info@tahardinglawfirm.com

October 13, 2023

Lightfoot, Franklin, & White
Attn.: Mr. Jackson R. Sharman, III
400 20th Street North
Birmingham, AL 35203

Subject: September 12, 2023, Subpoena to the Secretary of State of Georgia
State v. Floyd, et al.
Superior Court of Fulton County
Criminal Case No.: 23CS1888947

Dear Mr. Sharman,

Thank you for your response dated October 12, 2023, and the documents you provided for Requests 1 and 2. To avoid litigation over the September 12, 2023, subpoena served upon the Secretary of State of Georgia, we would propose the following additional language to Requests 3 through 7 to narrow the scope of the requested items:

3. Copies of any and all videos of interviews your agency or department received or conducted and concluded concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.
4. Copies of any and all audio recordings of interviews your agency or department received or conducted and concluded concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.
5. Copies of any and all audio recordings of phone calls your agency or department received or conducted and concluded concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.
6. Copies of any and all videos and audio recordings your agency or department received or conducted and concluded in conjunction with the Georgia Bureau of Investigations of Federal Bureau of Investigations concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.

This communication, and any accompanying documents, contain information from the Harding Law Firm, LLC, which may be confidential and/or legally privileged, and regardless of the nature of the information thereon, the documents are intended only for the use of the individual or entity to which the documents are addressed. **If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action in reliance upon the contents of the fax information is strictly prohibited, and that all documents should be returned to this office immediately.** In this regard, if you have received this in error, please notify us by telephone immediately so that we can arrange for the return of the documents to us at no cost to you.

7. Copies of any and all complaints or investigation reports your agency or department received or conducted and concluded concerning or pertaining to alleged election fraud in the November 03, 2020, General Election.

If your client is amenable to this limiting language, we would also be willing to extend the time to respond to October 28, 2023. Thank you for your time and attention to this matter. If you have any questions, please call our office.

Sincerely,

A handwritten signature in black ink, appearing to read 'T.A. Harding', with a long horizontal line extending to the right.

Todd A. Harding, J. D.
Attorney for Harrison Floyd

EXHIBIT D



Jackson R. Sharman III
Lightfoot, Franklin & White LLC
205.581.0789 direct
jsharman@lightfootlaw.com

13 October 2023

VIA EMAIL

Todd A. Harding, Esq.
The Harding Law Firm
113 E. Solomon Street
Griffin, GA 30223
kamikazehitman@comcast.net

*Re: Subpoena to the Secretary of State of Georgia
State v. Floyd, et al.
Superior Court of Fulton County, Georgia
Case No. 23SC188947*

Dear Mr. Harding:

Thank you for your letter and its amendment of certain of the requests in the subpoena.

We have considered the new language but do not believe that it overcomes our concerns or even changes the requests in a meaningful fashion.

If it is helpful in your decision making, we have confirmed that the Secretary has no documents responsive to Request Number 3, even as presently written.

With best wishes, I am,

Sincerely yours,

A handwritten signature in blue ink, appearing to read "J. Sharman III", written over a light blue circular watermark or background.

Jackson R. Sharman III

cc: Amaobi Enyinnia, Esq.