

**IN THE SUPERIOR COURT OF ATHENS-CLARKE COUNTY  
STATE OF GEORGIA**

JARROD MILLER,	:	
	:	
Applicant,	:	
	:	
v.	:	CIVIL ACTION NO.
	:	
DEBORAH GONZALEZ, in her official	:	SU-23-CV-0108
capacity as District Attorney,	:	
	:	
Respondent.	:	
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**NOTICE OF DEPOSITION OF RESPONDENT DEBORAH GONZALEZ**

To: Deborah Gonzalez  
District Attorney  
325 East Washington Street  
Room 370  
Athens, Georgia 30601  
[Deborah.Gonzalez@accgov.com](mailto:Deborah.Gonzalez@accgov.com)

COMES NOW, Applicant Jarrod Miller (hereinafter “Applicant”), in the above-styled matter, and pursuant to O.C.G.A. § 9-11-30, notices the deposition of Deborah Gonzalez. The deposition is scheduled for 2:00 p.m. on Saturday, March 25, 2023 and will be taken by stenographic and video means at the following location:

Oconee County Courthouse  
23 N Main Street  
Watkinsville, GA 30677

Pursuant to O.C.G.A. § 9-11-30(b), the deponent is hereby requested to produce the following documents attached in Exhibit “A”.

This deposition will be taken for the purpose of discovery, for use as evidence at trial, and for all other permissible purposes pursuant to O.C.G.A. § 9-11-26 and § 9-11-30 before a certified court reporter.

Respectfully submitted this the 20th day of March 2023.

**EPPS, HOLLOWAY, DELOACH  
& HOIPKEMIER, LLC**

BY:           /s/ Kevin E. Epps            
Kevin E. Epps  
Georgia Bar No. 785511  
*Attorney for Applicant*

1220 Langford Drive  
Building 200-101  
Watkinsville, Georgia 30677  
(706) 508-4000  
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## EXHIBIT A

### DOCUMENTS REQUESTED

#### INSTRUCTIONS AND DEFINITIONS

(a) As used herein, “Document” or “Documents” shall mean, but without limitation:

(1) documents contained in a physical form including short message service (“text messages”) (including attachments thereto), emails (including attachments thereto and enclosures therein), email accounts, Personal Storage Table (“PST”) and Offline Storage Table (“OST”) or Lotus notes database (“NSF”) files related to email accounts, messages, calendar events and other items, credit card statements and records, per diem records, financial statements, invoices, bank records, checks, records of wire transfers, correspondence, memoranda, tapes, stenographic or handwritten notes, studies, publications, books, pamphlets, pictures, films, voice recordings, maps, graphs, reports, surveys, and minutes or statistical compilations (“Physical Documents”), which are relevant, or likely to lead to relevant evidence, relating to any issue involved in the litigation between the parties to this action, and (2) documents contained in electronic form including short message service (“text messages” or “iMessages”) (including attachments thereto), emails (including attachments thereto **and enclosures therein**), credit card statements and records, per diem records, financial statements, invoices, bank records, checks, records of wire transfers, correspondence, memoranda, tapes, stenographic and handwritten notes, studies, publications, books, pamphlets, pictures, films, voice recordings, maps, graphs, reports, surveys, and minutes or statistical compilations contained **on computers and laptops and servers and any other electronic storage systems** including, but not limited to, magnetic impulse, mechanical or electronic recording or other form of data compilation (“Electronic Documents”), which are relevant, or likely to lead to relevant evidence, relating to any issue involved in the litigation between the parties in this action (collectively “Documents”).

(b) The words "you" and "your" mean you (Deborah Gonzalez and the Office of District Attorney of the Western Judicial Circuit), and your representatives, agents, insurers, attorneys, employees, directors, and all others over whom you have control.

(c) The words "possession, custody, or control" mean all documents and things belonging to you that are in your possession, all documents and things belonging to others of which you have custody, and all documents and things in the custody of others which you have the right to control.

#### **DOCUMENTS TO BE PRODUCED**

1. Please produce any and all statements, emails, correspondence, reports, notices, records, or documents of any kind, written or otherwise recorded, made or prepared by Respondent, or any other person or persons, referring to, relating to, or discussing the subject matter of this action, except for items which are protected by the attorney-client privilege.
2. Please produce any and all statements, emails, correspondence, reports, notices, records, or documents of any kind, written or otherwise recorded, prepared by Respondent, or on its behalf, for the purposes of rendering an opinion regarding the subject matter of this civil action.
3. Please produce copies of any and all records, documents, or tangible and/or demonstrative items not otherwise produced that were relied upon or identified in Respondent's response to Petitioner's First Continuing Interrogatories to Respondent.
4. Please produce all other documents upon which Respondent intends to rely in connection with this matter.
5. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence regarding resignations from January 1, 2021-Present.

6. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence regarding complaints about leadership from January 1, 2021-Present.
7. Official number of current preindictment cases.
8. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence regarding complaints of any issues within the District Attorney's office from January 1, 2021-Present.
9. A copy of any and all resumes submitted to the District Attorney's office from January 1, 2021-Present.
10. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence between Deborah Gonzalez and any public relations/external relations team members from January 1, 2021-Present.
11. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence regarding job postings.
12. A copy of any job postings made (active or deleted) by the District Attorney's office from January 1, 2021-Present.
13. A copy of any and all interoffice memos from January 1, 2021-Present.
14. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence with any Prosecutors outside of the Western Circuit District Attorney's Office from January 1, 2021-Present regarding the need for prosecution help.

15. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence with the Prosecuting Attorneys Council of Georgia from January 1, 2021-Present regarding the need for prosecution help.
16. A list of any and all cases that the Western Circuit District Attorney's Office has conflicted out of from January 1, 2021-Present and the basis for the conflict.
17. Any and all social media post in the past 6 months on behalf of the District Attorney or Western Circuit District Attorney's Office (active and deleted).
18. Complete accounting of Pretrial Diversion Program funds from January 1, 2021-Present.
19. Complete accounting of all asset forfeitures from January 1, 2021-Present.
20. Any documentation including, but not limited to e-mails, letters, voicemails, correspondence, memoranda, faxes, SMS/MMS text message correspondence, reports and background checks regarding investigations, misconduct, allegations, sanctions and termination/resignation of any Assistant District Attorney's employed or being considered for employment by the Western Judicial Circuit District Attorney's office from January 1, 2021-Present. This includes, but is not limited to, Robert Schollmeyer and Graham Penney.
21. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence from District Attorney Deborah Gonzalez with the term "white male" from January 1, 2021-Present.
22. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence regarding any political action committee(s) from January 1, 2021-Present.

23. A copy of any and all communications including e-mails, letters, voicemails, correspondence, memoranda, faxes and SMS/MMS text message correspondence from former Assistant District Attorney Robert Schollmeyer with the term “animal” from January 1, 2021-Present.
24. A copy of any and all communications including e-mails, letters, correspondence, memoranda and faxes from any Western Judicial Circuit Superior Court Judge to District Attorney Deborah Gonzalez from January 1, 2022-Present regarding caseload and case backlog.
25. From January 1, 2021, any documents, emails, receipts, canceled check, email confirmation of payment, or correspondence relating to any business including but not limited to any non-profit or other organization, that has received money (whether for goods, services, or for any other purpose) from:
  - a. “Justice Warriors” or similarly named fund, or bank account, or entity;
  - b. “Justice is on the Agenda” or similarly named fund, bank account, or entity;
  - c. Any bank account that includes “District Attorney” in the name or address of the account;
  - d. Bluebird PAC, Inc.;
  - e. Justice Warriors PAC;
  - f. Any victim fund containing funds to be used for the victims of crimes prosecuted by the DA’s office.
26. From January 1, 2021 until the time of the receipt of this request, any Memorandum of Understanding signed by Respondent or any other employee of the DA’s office.
27. From January 1, 2021 until the date of this request, any bank statements, credit card statements and other accounting or financial contributions, expenditures, or disbursements for the

following:

a. Any bank account or credit card that includes “District Attorney” in the name or address of the account;

b. Any bank account or credit card that includes “Justice is on the Agenda” in the name or address of the account;

c. Any bank account or credit card that includes “Bluebird PAC” in the name or address of the account;

d. Any bank account or credit card that includes “Justice Warriors” in the name or address of the account;

e. Any bank account containing funds to be used for the victims of crimes prosecuted by the DA’s office.

28. A copy of all emails, letters, SMS/MMS text messages, and letters of resignation between Respondent and June Teasley between February 26, 2023 and March 5, 2023.