

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,)	
)	
Plaintiff,)	
)	INDICTMENT NO:
v.)	
)	22SC183572
KAHLIEFF ADAMS, et al,)	
)	
Defendants.)	

MOTION TO QUASH ORDER TO SHOW CAUSE
AND MOTION TO RECUSE THIS COURT

COMES NOW Attorney Kayla Bumpus through undersigned counsel and files this Motion to Quash the Court’s Order to Show Cause¹ filed June 11, 2024, or, in the alternative moves this Court to transfer this action to another judge or recuse itself as required by law. In support thereof, Attorney Bumpus shows the following:

I. RECITATION OF THE FACTS

On Friday, June 7, 2024, during the trial, the State immunized Kenneth Copeland and called him as a witness. Copeland refused to testify. The Court placed Copeland in custody over the weekend for his refusal and adjourned until Monday. At this point, Copeland was still sworn as a witness and had not been dismissed.

On Monday, June 10 at 8:30 A.M., Copeland and his lawyer, Attorney Kayla Bumpus, were escorted to this Court’s chambers and conducted an *ex parte* meeting regarding whether Copeland would testify. Those present for the substantive portion of

¹ Order is attached as Exhibit 1.

this *ex parte* meeting were: Chief Judge Glanville, Copeland, Attorney Bumpus, Assistant District Attorneys Adrian Love and Simone Hylton, members of the Court's security staff and deputies, two investigators from the District Attorney's office, and a court reporter.

In chambers, this Court asked Copeland whether he was prepared to testify. Copeland announced that he planned to again invoke his Fifth Amendment privilege on the stand. A conversation among the parties ensued regarding Copeland's understanding of immunity, how Copeland thought he may testify if he did not invoke the Fifth, and certain facts of the case. Once Copeland learned that he could be held indefinitely by the Court if he refused to testify (not just two years, as he initially believed), Copeland decided that he would testify. Copeland added that his testimony would be a lie. The meeting ended and the parties went to the courtroom.

This *ex parte* meeting was not placed under seal. There was no protective order that directed that disclosure of these *ex parte* communications was prohibited. No attorney-client-privilege existed (clearly, as two prosecutors, investigators, a judge, a court reporter, and various court staff were also all present). The Court never stated, ruled, or inferred that the meeting was meant to be confidential. Further, the content of this meeting was not secret, protected, or in any way privileged information.² It is unclear why any person present would have understood that the content of the meeting could not be shared with other attorneys of record in the case who are also with fellow officers of the court.

² If there was any privilege, such as attorney-client or work product, the privilege would be destroyed with all other parties present—particularly the court reporter.

Later that same day, defense counsel, Attorney Brian Steel, addressed this Court to make a record of his due process concerns regarding the *ex parte* meeting. The content of said meeting would not just be non-confidential but would usually be given to the defense under *Giglio* and *Brady*.

During Attorney Steel's attempt to put his Due Process concerns on the record, this Court began to focus on the identity of the source who "leaked" the meeting to Defense counsel. The Court ordered Attorney Steel to provide the name of the person who divulged the existence and content of the *ex parte* meeting. Attorney Steel refused. A brief hearing followed and what initially appeared to be a classic civil contempt action (the attorney could purge himself of contempt if he provided the information to the judge), became a criminal contempt action. The Court found Attorney Steel in Direct Criminal Contempt. This Court sentenced Attorney Steel to the maximum time allowed which was 20 days to serve in the Fulton County jail.³

On June 11, 2024, this Court entered a Show Cause Order directing "all individuals that were present for the *ex parte* conversation that took place in the Court's chambers on the morning of June 10, 2024—specifically, Copeland, his attorney, Attorney Bumpus, "and all representatives of the State and Court security personnel that were in attendance" to show cause "why one or more of them should not be held in contempt for disclosing information from the *ex parte* conversation to members of the Defense counsel." No specific names were included in the order, other than Copeland and Attorney Bumpus.

³ Attorney Steel has since received an appeal bond and his contempt proceeding was stayed by the Georgia Supreme Court.

II. ARGUMENT

The Court seeks to hold in contempt the person that leaked the *ex parte* meeting to Defense counsel. Thus, the contempt hearing will be about who informed Defense counsel, whether to find that person guilty of criminal contempt, and, if contempt is found, the appropriate punishment. The procedures that a trial court must follow to hold a person in contempt depends upon whether the acts alleged to constitute the contempt were committed in court (direct contempt) or committed out of court (indirect contempt):

An alleged contumacious act may only be said to have occurred in the presence of the court, warranting summary contempt proceedings, if the act was committed in open court. . . . On the other hand, where the alleged contumacious acts are committed outside the court's presence, the considerations justifying expedited procedures do not pertain. Thus, summary adjudication of indirect contempts is prohibited, and due process requires that a person who is tried for indirect criminal contempt is entitled to more normal adversary procedures. Among other things, he or she must be advised of charges, have a reasonable opportunity to respond to them, and be permitted the assistance of counsel and the right to call witnesses.

In re Adams, 354 Ga. App. 484, 486–87, 841 S.E.2d 143, 145–46 (2020) (emphasis in original). The “disclosing information from the *ex parte* conversation to members of the Defense counsel” occurred, not in open court or in chambers, but at the time and location that Defense counsel were notified of the *ex parte* meeting. Further, direct contempt involves contemptuous conduct in the presence of the court which generally results in immediate punishment. Here, the need for punishment is clearly not immediate as demonstrated by the Show Cause Order being set two weeks out from the Order.

Forms of contempt are further divided into criminal and civil, based on the nature of the punishment imposed. Civil contempt is a conditional punishment intended to coerce

the contemnor to comply with the court order (*Hopkins v. Hopkins*, supra, 244 Ga. 66, 67 (1979)). By contrast “criminal contempt imposes unconditional punishment for prior contempt, to preserve the court's authority and to punish disobedience of its orders.” *Yntema v. Smith*, 371 Ga. App. 19, 28, 899 S.E.2d 543, 553 (2024). The contempt alleged by this Court of “disclosing information from the *ex parte* conversation to members of the Defense counsel” could only be criminal contempt. Nothing can be done to purge or undue that alleged contemptuous act, and any punishment would amount to criminal contempt.

A. NO CONTEMPTUOUS CONDUCT OCCURRED

There neither is, nor was, anything preventing the disclosure of this *ex parte* meeting to defense counsel. Disclosure did not violate a court order. There is no standing order in place or trial order that bars, or in any way limits, defense counsel for witnesses (or any other individuals present at the *ex parte* meeting) from communicating with defense counsel for the defendants about the meeting and its contents.⁴

⁴ Even if a protective order were in place that barred participants in the *ex parte* meeting with a sworn key witness from notifying Defense counsel, such an order would deprive the Defendants of their Due Process rights. *Ex parte* communications are presumed to have been in error. *Arnau v. Arnau*, 207 Ga. App. 696, 697(1), 429 S.E.2d 116 (1993). Uniform Superior Court Rule 4.1 provides: “Except as authorized by law or by rule, judges shall neither initiate nor consider *ex parte* communications by interested parties or their attorneys concerning a pending or impending proceeding.” *Ex parte* hearings are only authorized in the case of extraordinary matters such as temporary restraining orders and temporary injunctions. In other judicial hearings, both parties should be notified of the hearing with an opportunity of attending and voicing any objection that may be properly registered. (Citation and punctuation omitted.) *Anderson v. Fulton Natl. Bank*, 146 Ga. App. 155, 156, 245 S.E.2d 860 (1978). These general requirements repeat in the Georgia Code of Judicial Conduct

Where circumstances require, *ex parte* communications are authorized for scheduling, administrative purposes, or emergencies that do not deal with substantive matters or issues on the merits, provided that: the judge reasonably believes that no party will gain a procedural, substantive, or tactical advantage as a result of the *ex parte* communication; and the judge makes provision promptly to

To the extent that this Show Cause Order may be subject to a general demurrer, the Order cannot pass this test.⁵ Assuming as true the “allegation” of “disclosing information from the *ex parte* conversation to members of the Defense counsel,” contemptuous conduct is not alleged.⁶ Furthermore,

[C]ontempt may be found only where the attorney knows or reasonably should be aware in view of all the circumstances, especially the heat of controversy, that he is exceeding the outermost limits of his proper role and hindering rather than facilitating the search for truth.

notify all other parties of the substance of the *ex parte* communication, and gives the parties an opportunity to respond.

Georgia Code of Judicial Conduct, Rule 2.9(A)(1). The *ex parte* communication in this case did not meet any of the criteria in Georgia Code of Judicial Conduct, Rule 2.9(A)(1). It was not for “scheduling, administrative purposes, or emergencies.” *Id.* It did in fact deal with “substantive matters or issues on the merits.” *Id.* Further, the State by way of knowing what Mr. Copleand said in the meeting, did “gain a procedural, substantive, or tactical advantage as a result of the *ex parte* communication.” *Id.* Finally, the Court did not “make[] a provision promptly to notify all other parties of the substance of the *ex parte* communication, and gives the parties an opportunity to respond.” *Id.*

⁵ Jackson v. State, 301 Ga. 137, 141 (1) (2017) (“To withstand a general demurrer, an indictment must: (1) recite the language of the statute that sets out all the elements of the offense charged, or (2) allege the facts necessary to establish violation of a criminal statute. If either of these requisites is met, then the accused cannot admit the allegations of the indictment and yet be not guilty of the crime charged.”).

⁶ The show cause order in this case is analogous to a criminal indictment. Attorney Bumpus, and all the other participants in the *ex parte* meeting, are facing criminal contempt. Criminal contempt is a crime in the ordinary sense; it is a violation of the law, a public wrong which is punishable by fine or imprisonment or both (*Garland v. State*, 253 Ga. 789, 325 S.E.2d 131 (1985)). As such, the Show Cause Order acts as the charging document, which must “fairly and fully inform[] the accused of the specific acts of contempt.” *In re Harris*, 289 Ga. App. 334, 337–38, 657 S.E.2d 259, 262 (2008). “Like all crimes, contempt has an act requirement (*actus reus*) and a mental component (*mens rea*).” *In re Jefferson*, 283 Ga. 216, 218, 657 S.E.2d 830, 832 (2008) (citations omitted).

In re Jefferson, 283 Ga. 216, 220, 657 S.E.2d 830, 833 (2008). Disclosure of the meeting did not exceed the limits of anyone's proper role and, if anything, the disclosure facilitated the search for the truth.

A judge may reasonably expect his clerks, and other judges, to keep what happens in chambers professionally private. However, they are under no legal duty to do so. Such an expectation of privacy does not extend to third parties not part of the Court's staff.

Holding an *ex parte* meeting in chambers did not impose a duty of secrecy. Informing counsel for defense of the existence and content of this chambers meeting did not violate any rule of law, trial order, or standing order and is not a basis for contempt. The Show Cause Order, failing to articulate an act of contempt, should be quashed.

B. THIS COURT MUST TRANSFER THIS CONTEMPT MATTER TO ANOTHER JUDGE UNDER THE PROCEDURE FOR INDIRECT CONTEMPT OR, ALTERNATIVELY, RECUSE ITSELF PURSUANT TO GEORGIA CODE OF JUDICIAL CONDUCT, RULE 2.11

This Court must transfer this matter to another judge under the procedure for indirect contempt.⁷ The Court may not preside over this contempt proceeding because the Court does not satisfy the following criteria:

In indirect contempt actions, the trial judge who was presiding over the trial during which the alleged contumacious conduct occurred may preside over the contempt hearing if the contumacious conduct was not directed toward the judge and the judge did not react to the contumacious conduct in such manner as to become involved in the controversy.

Ramirez v. State, 279 Ga. 13, 15, 608 S.E.2d 645, 647 (2005).

⁷ See the accompanying Affidavit, attached at Exhibit 2, which asserts facts upon which this Motion is founded.

Here, the alleged contemptuous conduct was, as expressed by the Court, directed at least in part toward the Court personally and the “sacrosanct” nature of its chambers. The Court became involved in the controversy both by holding the *ex parte* meeting in the first place, and by way of the fact that this Court is a witness to the potentially disputed fact of whether there was any kind of order to not disclose the meeting to counsel for the Defense.

The Georgia Code of Judicial Conduct Court dictates recusal because the Court’s impartiality might reasonably be questioned. “When considering the issue of recusal, both OCGA § 15–1–8 and Canon 3 of the Code of Judicial Conduct should be applied. The Code of Judicial Conduct provides a broader rule of disqualification than does OCGA § 15–1–8.” *Jones Cnty. v. A Mining Grp., LLC*, 285 Ga. 465, 465–66, 678 S.E.2d 474, 474 (2009) (citations omitted). The broad rule of disqualification set forth in the Georgia Code of Judicial Conduct, Rule 2.11(formally 3.9) provides:

Judges shall disqualify themselves in any proceeding in which their impartiality might reasonably be questioned, or in which...The judge has a personal bias or prejudice concerning a party or a party’s lawyer, or personal knowledge of disputed evidentiary facts concerning an impending matter or a pending proceeding.

Here, the Court’s impartiality might reasonably be questioned for five reasons. First, this Court stated “this is so sacrosanct to have a conversation in my chambers, parroted to you and others. It is that serious.” revealing that this Court views the harm to be at least in part a direct harm to this Court personally and/or the sanctity of his own chambers. Second, as described in the show cause order, some of the other participants in the *ex parte* hearing were the Court’s own security personnel. This gives rise to two issues. As potential witnesses they may testify at the hearing, at which time the presiding judge will have to

assess the credibility of their testimony. It “might reasonably be questioned” that this Court would give more credibility to the Court’s own security personnel than it would to other potential witnesses, such as Attorney Bumpus. Further, the Court’s own security personnel and reporter, like Attorney Bumpus, are subject to potentially being held in contempt. This Court’s “impartiality might reasonably be questioned” if it were to sit as both the prosecutor and fact finder when deciding if it was the Court’s own security personnel and reporter, someone else who disclosed the meeting. Third, this Court has “personal knowledge of [a potentially] disputed evidentiary fact” of whether there was an order of any kind barring disclosure of the meeting to counsel for the defense. Fourth, this Court appears to already have decided prior to any hearing that it was Attorney Bumpus who made the disclosure. While holding Attorney Steel in contempt this Court stated:

Well then other than if you [Attorney Steel], if you were sitting, unless you were sitting in there with a recorder or Ms. Love or Ms. Hilton, uh, or one of the deputies gave you that information, or Ms. Weaver shot you a rough copy of the transcript, there's only one other person that's left. and if that person gave you that information or shared that information with you, she probably violated privilege.

This Court’s Show Cause Order reinforces this pre-determination as the Order references no other person present at the meeting by name other than Attorney Bumpus or Copeland. Fifth and finally, the Court was visibly impacted when it learned that Attorney Steel had been informed of the meeting.

The Georgia Supreme Court referenced an opinion echoing this case in noting when a recusal motion *clearly has merit*:

But what if the motion to recuse *has merit*—what if the judge who announced an oral ruling is (or reasonably appears to be) partial or prejudiced and

therefore has no business continuing to preside over the case? See Georgia Code of Judicial Conduct Rule 2.11 (A) (1). What if, for example, a party defending himself at a contempt hearing turns around and accuses the judge of prejudice, and the judge actively defends himself and then orally holds the accusing party in contempt? *Cf. Post*, 298 Ga. at 256-258, 779 S.E.2d 624 (explaining that argument over recusal issues “may draw the judge into presenting his side of the story, which in turn may create a perception that the judge is an advocate or hostile witness rather than an impartial adjudicator in the case,” requiring disqualification).

Mondy v. Magnolia Advanced Materials, Inc., 303 Ga. 764, 776, 815 S.E.2d 70, 80 (2018).

This alleged contempt is not ongoing and does not require immediate resolution. This Court has ample time to transfer this case to another judge who was not involved in the *ex parte* proceeding, who is not a potential witness to a potentially disputed evidentiary fact, who does not view the harm to be at least, in part, a direct harm to that judge personally and/or the sanctity of that judge’s own chambers, and who is not called to determine whether that court’s own security personnel or reporter committed the alleged contempt and, if so, what punishment to impose.

C. THIS COURT MUST PROVIDE A NOTICE THAT FAIRLY AND FULLY INFORMS THE ACCUSED OF THE SPECIFIC ACTS OF CONTEMPT

When a contempt proceeding is criminal, the full panoply of constitutional protections must be afforded the accused: *See In re Hughes*, 299 Ga. App. 66, 681 S.E.2d 745 (2009); *In re Hatfield*, 290 Ga. App. 134, 658 S.E.2d 871 (2008); *Thomas v. State*, 174 Ga. App. 476, 330 S.E.2d 412 (1985); *McDaniel v. State*, 202 Ga. App. 409, 414 S.E.2d 536 (1992). This includes a notice “fairly and fully informing the accused of the specific acts of contempt.”

This requirement of reasonable notice in a case involving an alleged *indirect* contempt ... contemplates and necessitates a written notice fairly and fully informing the accused of the specific acts of contempt with which she is charged, and so given as to afford a reasonable time to make her defense. Any notice short of that would make a hollow mockery of the fundamental and abiding truth that reasonable notice to one whose civil rights or personal liberty may be affected is a veritable cornerstone of our judicial system, would constitute nothing more than an exquisite exercise in frustrating futility, sometimes misleading and always meaningless, and would be but sounding brass and tinkling cymbal, a notice in form but not in substance.

In re Harris, 289 Ga. App. 334, 337–38, 657 S.E.2d 259, 262 (2008) (citations omitted).

“Like all crimes, contempt has an act requirement (*actus reus*) and a mental component (*mens rea*).” *In re Jefferson*, 283 Ga. 216, 218, 657 S.E.2d 830, 832 (2008) (citations omitted). The notice alleges an *actus reus* (disclosing the *ex parte* meeting) but fails to put Attorney Bumpus on notice of the *mens rea* (that or how the discloser would know such an act amounted to contempt). The notice does not allege facts from which a contemptuous *mens rea* could be inferred.

As set forth above, the act of disclosing the meeting to Defense counsel cannot in and of itself amount to contempt. The disclosure could only potentially amount to contempt if it violated a court order, or some other legal duty, to not disclose the *ex parte* meeting. The notice fails to allege any such restriction. As such, the notice fails to “fairly and fully inform[] the accused of the specific acts of contempt.”

WHEREFORE, Attorney Bumpus moves this Court to:

1. Quash its Order to Show Cause; or, in the alternative,
2. Recuse itself from this proceeding and/or transfer this proceeding to another judge whose impartiality can’t reasonably be questioned, or, in the alternative,

3. Provide an adequate notice that fully and fairly informs Attorney Bumpus of the alleged contempt.
4. Should all of the above requested relief be denied, Attorney Bumpus requests a certificate of Immediate Review.

SUBMITTED THIS THE 14TH DAY OF JUNE, 2024,

/s/ Julius B. Collins

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/s/ John A. Garland

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ATTORNEYS FOR KAYLA BUMPUS

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

STATE OF GEORGIA,)	
)	
Plaintiff,)	
)	INDICTMENT NO:
v.)	
)	22SC183572
KAHLIEFF ADAMS, et al,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed this *MOTION TO QUASH ORDER TO SHOW CAUSE AND MOTION TO RECUSE THIS COURT* using the ODYSSEY eFileGA system which will automatically send email notification of such filing to all attorneys and parties of record.

This, the 14th day of June, 2024.

SUBMITTED,

GARLAND, SAMUEL & LOEB, P.C.

/s/ Kristen W. Novay
KRISTEN W. NOVAY
Georgia Bar No. 742762
Attorney for Kayla Bumpus

3151 Maple Drive, N.E.
Atlanta, GA 30305
Tel.: 404-262-2225
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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

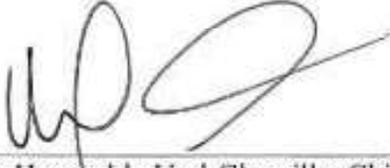
STATE OF GEORGIA,)	
)	INDICTMENT
v.)	NO. 22SC183572
)	
KAHLIEFF ADAMS, et al,)	
)	
Defendants,)	

ORDER TO SHOW CAUSE

The Court having been presented with an issue of contempt for determination, all individuals that were present for the *ex parte* conversation that took place in the Court's chambers on the morning of June 10, 2024 - to include the witness Mr. Kenneth Copeland, his attorney Ms. Kayla Bumpus, and all representatives of the State and Court security personnel that were in attendance - are **HEREBY ORDERED** to Show Cause before the Honorable Ural Glanville, on **25th day of June, 2024, at 9:00 AM in Courtroom 1C**, 185 Central Avenue SW, Atlanta, GA 30303, why one or more of them should not be held in contempt for disclosing information from the *ex parte* conversation to members of the Defense counsel.

IT IS FURTHER ORDERED that the failure of any of the individuals who were present for the June 10, 2024, *ex parte* conversation will cause the Court to direct the Fulton County Sheriff's Office to take them into custody and bring them to the bar of this Court.

SO ORDERED, this 11th day of June, 2024.



The Honorable Ural Glanville, Chief Judge
Superior Court of Fulton County
Atlanta Judicial Circuit

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,)	
)	
Plaintiff,)	
)	INDICTMENT NO:
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)	22SC183572
KAHLIEFF ADAMS, et al,)	
)	
Defendants.)	

**AFFIDAVIT IN SUPPORT OF MOTION TO
RECUSE CHIEF JUDGE URAL GLANVILLE**

Personally appeared before the undersigned officer duly authorized to administer oaths, Julian Collins, Kristen Novay, Gabe Banks, Nicole Moorman, and Matthew K. Winchester, who, upon being duly sworn, depose and state the following under oath and penalty of perjury:

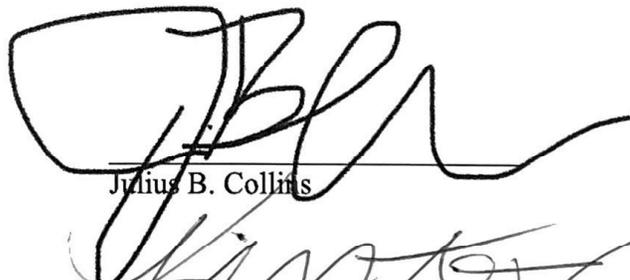
1. Chief Judge Glanville is presiding over the above-styled case.
2. Sworn witness Kenneth Copeland was held in civil contempt of court on June 7, 2024, for refusing to testify after being given a grant of immunity by Chief Judge Glanville.
3. On June 7, 2024 Chief Judge Glanville informed Mr. Copeland and all parties that Mr. Copeland would be jailed and brought back to court on June 10, 2024, at 8:30 a.m.
4. On the morning of June 10, 2024 an *ex parte* meeting was held in Chief Judge Ural Glanville's chambers, that *ex parte* meeting included Chief Judge Glanville, Mr. Kenneth Copeland, his attorney Ms. Kayla Bumpus, and representatives of the State, and Court security personnel.

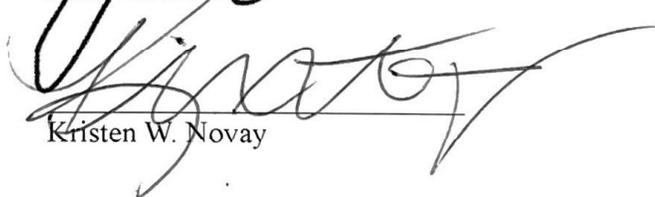
5. Later in the day on June 10, 2024, Mr. Steel (counsel for Mr. Williams) informed Chief Judge Glanville that he and others had learned that of the *ex parte* meeting. The Court acknowledged that the *ex parte* meeting had occurred.
6. Mr. Steel requested information about the *ex parte* meeting, which Chief Judge Glanville did not provide.
7. Mr. Steel made a motion for a mistrial asserting that the *ex parte* meeting violated Mr. Williams’s constitutional and statutory rights, including the right to due process and a fair trial. Chief Judge Glanville denied Mr. Steel’s motion.
8. Chief Judge Glanville repeatedly ordered Mr. Steel to provide the name of the person who divulged the existence and content of the *ex parte* meeting. Mr. Steel, citing State of Georgia Bar Rule 1.6, Confidentiality of Information, declined to provide the information requested by Chief Judge Glanville.
9. Chief Judge Glanville held Mr. Steel in contempt for refusing to provide the name of the person that divulged the existence and content of the *ex parte* meeting.
10. The next day, on June 11, 2024, Chief Judge Glanville entered a show cause order directing “all individuals that were present for the *ex parte* conversation that took place in the Court’s chambers on the morning of June 10, 2024—to include Mr. Kenneth Copeland, his attorney Ms. Kayla Bumpus and all representatives of the State and Court security personnel that were in attendance” to show cause “why one or more of them should not be held in contempt for disclosing information from the *ex parte* conversation to members of the Defense counsel.”
11. The Order to Show Cause only references Attorney Bumpus and Mr. Copeland by name. All others in attendance—despite having access to the same information—were not named in the Order.
12. Upon learning that Mr. Steel was aware of the *ex parte* meeting, Chief Judge Glanville stated, “this is so sacrosanct to have a conversation in my chambers, parroted to you and others. It is that serious.”
13. During his exchange with Mr. Steel on June 10, 2024, regarding the *ex parte* meeting, Chief Judge Glanville stated:

Well then other than if you, if you were sitting, unless you were sitting in there with a recorder or Ms. Love or Ms. Hylton, uh, or one of the deputies gave you that information, or Ms. Weaver shot you a rough copy of the transcript, there's only one other person that's left. And, and if that person gave you that information or shared that information with you, she probably violated privilege. Because she has a client she's supposed to represent.

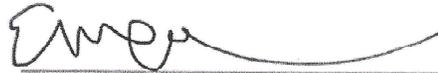
14. The “she” that Chief Judge Glanville was referencing in the statement in Paragraph 13 was Attorney Bumpus.
15. Chief Judge Glanville made the statements referenced in Paragraph 13, before he made any inquiries or any factual determinations. Chief Judge Glanville has already determined that it was Attorney Bumpus that “leaked” the information to Mr. Steel and that determination was made prior to any hearing and based on his own knowledge and belief.
16. Chief Judge Glanville accused Attorney Bumpus of violating attorney client privilege when speaking with Mr. Steel and made said accusation prior to any investigation, hearing, or reviewing any evidence.
17. Chief Judge Glanville intends to preside over the June 11, 2024, Order to Show Cause in the same above-styled case and he will be the fact finder and make credibility determinations concerning the parties present at the *ex parte* meeting.
18. If Chief Judge Glanville were to preside over the show cause hearing, he will have to make credibility determinations of the court’s own security personnel.

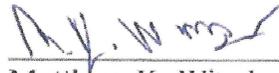
Further affiants sayeth not.


Julius B. Collins

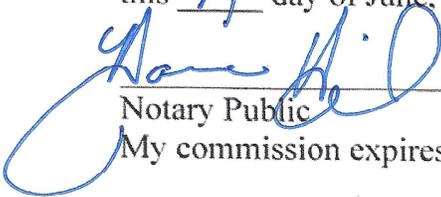

Kristen W. Novay


Gabe Banks


Nicole Moorman


Matthew K. Winchester

Sworn to and subscribed before me
this 14 day of June, 2024.


Notary Public
My commission expires: 2/1/26

