IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,	)	
	)	
v.	)	**INDICTMENT NO.**
	)	**23SC188947**
MICHAEL A. ROMAN,	)	
	)	
Defendant.	)	
	)	

DEFENDANT MICHAEL ROMAN'S INITIAL REPLY TO THE STATE'S RESPONSE TO MR. ROMAN'S MOTION TO DISMISS AND DISQUALIFY THE DISTRICT ATTORNEY

COMES NOW, Defendant Michael Roman ("Mr. Roman"), by and through his undersigned counsel, and files his initial reply solely on the issue of the State's suggestion that no evidentiary hearing is required in this matter and to make clear why an evidentiary is hearing is necessary in this matter.[1]

ARGUMENT AND CITATION OF AUTHORITY

Let us be clear: if Mr. Roman had not uncovered the now-admitted personal relationship between Willis and Wade, no one may have ever known about it. That raises the obvious and important question: If they had nothing to hide in the first place because they did nothing wrong, then why did they intentionally not tell anyone about it until they got caught with their hand in the cookie jar? This highlights the very reason why this Court cannot just take their word for it. They now attempt to escape accountability by asking this

[1] This initial reply is not meant to be a comprehensive reply to the State's response. Mr. Roman will be filing a much more comprehensive reply that addresses each of the State's arguments. This intial reply is being filed now because the State seeks to have this Court cancel the evidentiary hearing based solely on assertions in pleadings. As shown below, an evidentiary hearing is necessary to test the assertions of the State and there is no constitutional alternative.

Court to deny Mr. Roman the right to cross-examine and test their assertions at an evidentiary hearing, going so far as to submit an affidavit from Wade that is inadmissible and violative of the Confrontation Clauses of both the United States and Georgia Constitutions.[2] They are hoping this Court simply sees all growing smoke cloud and says, "No fire, nothing else to see here." It is not that simple. This is not a summary judgment motion. Peoples' freedom and lives are at stake.

Notably, Wade's affidavit proves that a hearing in this matter is needed. For example, if Mr. Roman was permitted to cross examine Wade, he could ask questions such as the following:

- In Paragraph 17 of your affidavit, you swore that you met Ms. Willis in October of 2019 at a Municipal Court training. Isn't it true that you began more than just a friendship at that conference?

- In Paragraph 31 of your affidavit, you swore that you have never cohabitated with Ms. Willis but the attached documents show you shared a king size bed with her in Aruba from November 1, 2022 until November 4, 2022. (See Exhibit "A").

- Additionally, witnesses will testify that you cohabitated with Ms. Willis at her home in South Fulton until her father moved in with her and you then began to cohabitate at the apartment of a friend of hers in East Point.

[2] The Constitution guarantees a criminal defendant the right to "be confronted with the witnesses testifying against such person." *Miller v. State*, 266 Ga. 850, 856, 472 S.E.2d 74, 79 (1996) (citing Art. I, Sec. I, Para. XIV). "[T]he primary advantage, and the one which the constitutional provision mainly guarantees, is the right of the accused to be confronted by the witness against him, to secure the opportunity of thorough cross-examination." *Denson v. State*, 150 Ga. 618, 622, 104 S.E. 780 (1920). Thus, ex parte affidavits are not admissible against a defendant in a criminal case. *Miller*, 266 Ga. at 856, 472 S.E.2d at 79 (citing *Smith v. State*, 147 Ga. 689, 95 S.E. 281 (1918)). "Affidavits of absent witnesses cannot be admitted in evidence at criminal trials because doing so violates the right of defendants to confront witnesses against them. [Cit.]" *Adams v. State*, 217 Ga.App. 706(2), 459 S.E.2d 182 (1995), cert. denied 217 Ga.App. 899. *See also Reed v. State*, 150 Ga.App. 312(2), 257 S.E.2d 380 (1979); *Becton v. State*, 134 Ga.App. 100, 101, 213 S.E.2d 195 (1975). *Cf. Freeman v. State*, 233 Ga. 745(2), 213 S.E.2d 643 (1975).

- Additionally, witnesses will testify that you cohabitated with Ms. Willis at an AirBNB in Hapeville that was paid for by tax payer money to serve as a "safe house" for you and Ms. Willis.

The State's response also states that Wade has "significant trial experience". (*See* State's Response, p.10). If his experience is so significant then he should welcome the opportunity to testify as to the specifics of the cases he has tried and enjoy the candid transparency that would bring to the process instead of hiding behind an unsubstantiated claim that he has "tried complex" matters including murder, rape, armed robbery, aggravated assault and drug trafficking.[3] To put it plainly, he has given this Court and the public no reason to take his word for it.[4]

A hearing is also needed because it appears that the District Attorney's Office is not being entirely "candid and transparent" as they allege in their response.[5] For example, the State attached to it's motion as Exhibit "H" a contract that Mr. Roman has been asking for, but has never received. Erica Willingham, the Open Records Officer for the Fulton County District Attorney responded repeatedly that she had given undersigned counsel all of the contracts that existed between FCDA and Mr. Wade but yet this contract was not contained among those. (See Exhibit "B"). This creates important factual questions about

[3] Included in the District Attorney's Response are pictures from Mr. Roman's counsel's facebook page showing that she supported Wade in his 2016 judicial race against incumbent Reuben Green. It is no secret that Mr. Roman's counsel worked tirelessly to defeat the incumbent judge against whom Wade ran. With only two candidates in the race, one of whom had been accused of serious judicial misconduct, Wade was most definitely the most qualified of the candidates on the ballot.

[4] For example, Mr. Wade was held in "willful contempt" on August 17, 2023 for failing to comply with a Court Order to provide bank records, financial statements, and discovery responses in his pending divorce case in Cobb County Georgia.

[5] *See* State's Response, p. 26 ("The State, in an effort to be as candid and transparent with the Court as possible, has provided the Affidavit of Special Prosecutor Wade and included other exhibits directly establishing facts that counter the wild and reckless speculation that the motions have advanced.")

whether Wade and Willis have been "transparent" that can only be resolved at an evidentiary hearing.

Mr. Roman requested copies of the invoices that are now attached to the State's response as Exhibit "3". On January 4, 2024 through the Open Records Portal for the Fulton County District Attorney, Mr. Roman requested these invoices and made *repeated* attempts to obtain them, but the District Attorney's Office failed to do so "based on staffing levels and workloads". The first time those invoices were ever made available to Mr. Roman was an exhibit to the State's response.

The State's response also blames Mr. Roman for not supplementing his motion once the divorce file was unsealed. That is the exact purpose of an evidentiary hearing, and Mr. Roman intends to present the evidence at the hearing. This is a criminal case, not a civil case. It cannot be decided on ex parte, self-serving affidavits. Some of the individuals whom Mr. Roman has subpoenaed to testify have personal knowledge that Wade and Willis' personal relationship began before his appointment as a special prosecutor. In other words, they have knowledge that the assertion by Willis in the State's response and in Wade's affidavit are both false. This is the reason Mr. Roman is entitled to cross-examine the State's witnesses, including Willis and Wade, on these material facts going to the heart of the issue of whether they should be disqualified.

CONCLUSION

For the foregoing reasons, Mr. Roman requests that this Honorable Court reject the State's request in its brief to cancel the evidentiary hearing in this matter.

Respectfully submitted this 2nd day of Feburary, 2024.

THE MERCHANT LAW FIRM, P.C.

/s/ Ashleigh B. Merchant

ASHLEIGH B. MERCHANT
Georgia Bar No. 040474
701 Whitlock Avenue, S.W., Ste. J-43
Marietta, Georgia 30064
Telephone: 404.510.9936
Facsimile: 404.592.4614
Email: *ashleigh@merchantlawfirmpc.com*

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,	)	
	)	
v.	)	**INDICTMENT NO.**
	)	**23SC188947**
MICHAEL A. ROMAN,	)	
	)	
Defendant.	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within and foregoing ***DEFENDANT MICHAEL ROMAN'S INITIAL REPLY TO THE STATE'S RESPONSE TO MR. ROMAN'S MOTION TO DISMISS AND DISQUALIFY THE DISTRICT ATTORNEY*** has been served upon counsel for the State of Georgia by filing same with the Court's electronic filing system, which will deliver a copy by e-mail to the following counsel of record for the State:

Nathan Wade
Nathanwade@lawyer.com

Anna Cross
Anna@crosskincaid.com

John Floyd
Floydbme@law.com

Daysha Young
Daysha.Young@fultoncountyga.gov

Adam Ney
Adam.Ney@fultoncountyga.gov

Alex Bernick
Alex.bernick@fultoncountyga.gov

F. McDonald Wakeford
FMcDonald.Wakeford@fultoncountyga.gov

Grant Rood
Grant.Rood@fultoncountyga.gov

John W. Wooten
Will.wooten@fultoncountyga.gov

I further certify that, in compliance with Judge Scott McAfee's Standing Order a copy of this pleading has been emailed to the Court via the Litigation Manager Cheryl Vortice at *Cheryl.vortice@fultoncountyga.gov* with copies of such communication provided to all counsel of record for the State at the email addresses provided above.

This 2nd day of February, 2024.

THE MERCHANT LAW FIRM, P.C.

/s/ Ashleigh B. Merchant
ASHLEIGH B. MERCHANT
Georgia Bar No. 040474

EXHIBIT A

R007353-090123 - Open Records Request

Message History (18)

On 1/29/2024 1:18:05 AM, Fulton County, Georgia wrote:

Subject: [Records Center] Open Records Request :: R007353-090123
Body:
Please log into the portal to see attached documents.

On 9/15/2023 2:59:36 PM, Ashleigh Merchant wrote:

Good afternoon. I am just following up hopefully one last time. I have not received any bids or county approval of these vendors. Please let me know if that means these items do not exist or if you are still working on getting them to me.

Additionally, I have not received any invoices for Christopher Campbell PC whatsoever. Please let me know if that means that no invoices exist or if you are still gathering those documents.

If you are still working on getting these items please let me know. If they do not exist please let me know that as well. If I do not hear from you by the end of the day, I will assume these items do not exist but please let me know one way or the other.

Thank you,
Ashleigh

On 9/14/2023 1:33:48 PM, Ashleigh Merchant wrote:

Good afternoon. I am just following up. We still have not received the original/initial (first) contract for Nathan Wade. If you would like I can email you what you sent and show you so that you can verify it does NOT include this original/initial contract. We also have not received the invoices for Chris Campbell, and have not received any documentation regarding the County approval of these contracts or the bid process for them. Please let me know when we can expect these remaining items. If those items do not exist, please let me know that as well. I look forward to your response.

Ashleigh Merchant

On 9/13/2023 12:36:21 PM, Ashleigh Merchant wrote:

There were two attachments that contained contracts for Nathan Wade. The first is "Nathan Wade" and it is 7 pages and does NOT contain the 2021 ORIGINAL contract. The second is Nathan Wade 2" and it is 4 pages and does NOT contain the 2021 ORIGINAL contract.

The original (first) contract is not included in these attachments.

Thank you.

Ashleigh Merchant

On 9/13/2023 11:23:02 AM, Fulton County, Georgia wrote:

Subject: [Records Center] Open Records Request :: R007353-090123
Body: Please see all attachments for Nathan Wade. There was one that I resubmitted on Monday.

On 9/13/2023 10:49:20 AM, Ashleigh Merchant wrote:

Thank you for sending those invoices. (1) We still do not have the contract for Nathan Wade that was the first contract that was entered into on November 1, 2021. We have the recontract and the addendum to the November 1, 2021 contract but not the contract.
We also do not have the invoices for (2) Terrance Bradley or (3) Christopher Campbell. Finally, (4) we do not have any county approval of these vendors or any documentation regarding the bids or county approval of these vendors and projects. If none of number (4) above exist, please let us know that as well.
Thank you so much!
Ashleigh Merchant

On 9/12/2023 12:02:34 PM, Fulton County, Georgia wrote:

Subject: [Records Center] Open Records Request :: R007353-090123
Body: see attached invoices.

On 9/11/2023 4:48:37 PM, Ashleigh Merchant wrote:

Pages 5-7 have those dates listed as the dates of the prior contract. Pages 5-7 are for the "recontract" and state that on page 5. They reference the prior contract and say that this is a "recontract". I do not have that original contract, it is just referenced on pages 5-7 and the dates are provided but the contract is not included in the materials you sent. Thank you!

On 9/11/2023 3:49:01 PM, Fulton County, Georgia wrote:

Subject: [Records Center] Open Records Request :: R007353-090123
Body: See attachment for Nathan Wade

On 9/11/2023 3:38:04 PM, Fulton County, Georgia wrote:

Subject: [Records Center] Open Records Request :: R007353-090123
Body: If you click on the Nathan Wade file, it has the contracts Dated November 1, 2021-October 31,2022. See Pages 5-7

On 9/11/2023 1:15:51 PM, Ashleigh Merchant wrote:

I received the contracts, thank you! The contract for Nathan Wade references an original contract that is not included. It would be the contract that began Nov 1, 2021 and ended Oct. 31, 2021. May I also have a copy of that contract?

As far as the invoices, the contracts reference travel and lodging expenses, I just wanted to make sure those reimbursements would be included. Thank you so much!!

On 9/11/2023 11:59:02 AM, Fulton County, Georgia wrote:

Subject: [Records Center] Open Records Request :: R007353-090123
Body:
See attached contracts. Invoice will be released no later than Friday of this week.

Thank you

On 9/11/2023 11:08:49 AM, Ashleigh Merchant wrote:

Good morning. Please let me know if these requests will be ready today. I requested them on Friday September 1, 2023 which would have put them due in 3 business days or September 7, 2023. It is now September 11, 2023 and I have not received them. I need to know when I can expect them so that I can determine if other steps need to be taken to insure they are provided in a timely manner. Thank you.
Ashleigh Merchant

On 9/7/2023 4:40:08 PM, Fulton County, Georgia wrote:

Subject: [Records Center] Open Records Request :: R007353-090123
Body: The Fulton County District Attorney's office is working on your request. As soon as we have the responsive records, we will notify you. Please allow a response to be given no later than next week. If anything changes before then you will be notified.

On 9/7/2023 3:56:58 PM, Ashleigh Merchant wrote:

Good afternoon. I am just following up again since it has been over 3 days and we do not have any documents yet. It is my understanding that the items I requested have potentially already produced to other requesters. Since it has been well over 3 days since our request, we are hoping to get copies of these items as soon as possible to verify what they contain. Thank you in advance.

On 9/7/2023 11:54:04 AM, Ashleigh Merchant wrote:

I received the message/letter from the Fulton County DA's office, Erica Willingham, in response to my request. My request was submitted on 9/1/2023 at 11:07 am. At this point, it has been more than 3 business days and I am hoping to get copies of the requests items asap. Please let me know when they will be sent or how I can get them asap?

Thank you

On 9/1/2023 11:07:02 AM, Fulton County, Georgia wrote:

Dear Ms. Ashleigh Merchant:

Thank you for submitting an Open Records Request to Fulton County, Georgia.

The County received your Open Records Act request dated September 01, 2023 and has assigned the reference number R007353-090123 for tracking purposes.

Record(s) Requested: *I am seeking copies of any and all bids, contracts, or agreements for the appointment and payment of the following contractors with Fulton County:*
The Law Offices of Nathan Wade
Christopher Campbell PC
The Cross Firm LCC
Anna Cross
Bondurant Mixon & Elmore LLP and
Terrance Bradley.
These individuals all appear to have been paid for services rendered to the District Attorney's Office and I am seeking their invoices, contracts, county approval of these vendors and any other documents regarding the contracting and payment of these vendors.

We will send out the request to the appropriate department(s). If you should have any questions or concerns about the requested documents, please feel free to contact the Fulton County Open Records team. If there should be a cost associated with the Open Records Request we will contact you in a timely manner.

Fulton County has a new Open Records Center that allows you to submit and track Open Records Act requests. Please visit the link below to monitor request progress and submit future requests.

Open Records Center

Fulton County Open Records

On 9/1/2023 11:06:59 AM, Ashleigh Merchant wrote:

Request Created on Public Portal

Re: Open Records Request R007353-090123

1 message

ashleigh merchant <ashleigh@merchantlawfirmpc.com> Thu, Sep 14, 2023 at 1:45 PM
To: "Willingham, Erica" <Erica.Willingham@fultoncountyga.gov>

So this contract that you have provided, it states the following:

WHEREAS, FCDA entered into and executed a contract dated November 1, 2021. This contract ended on October 31, 2022.

WHERE IS THIS CONTRACT THAT WAS ENTERED INTO AND EXECUTED ON NOVEMBER 1, 2021?

It also says that this is a "recontract"

WHEREAS, the FCDA intends to recontract the professional services of Attorney for legal services related to anti-corruption matters.

WHERE IS THE ORIGINAL CONTRACT?

Thank you!!!

Ashleigh B. Merchant
The Merchant Law Firm, P.C.
Trial and Appellate Attorneys
701 Whitlock Avenue, S.W.
Suite J-43, First Floor
Marietta, Georgia 30064
404.510.9936 (office)
404.592.4614 (fax)
ashleigh@merchantlawfirmpc.com
www.merchantlawfirmpc.com

On Thu, Sep 14, 2023 at 1:40 PM Willingham, Erica <Erica.Willingham@fultoncountyga.gov> wrote:

Please note the attorney signs and date after the contract has ended. I have given you all contracts.

Thank you,

Erica McCray-Willingham

Open Records Manager/Operations Division

Fulton County District Attorneys Office

141 Pryor Street, 2nd Floor

Atlanta,Georgia 30303

Office: 404-612-4667

Cell: 678-362-9256

EXHIBIT B

vacation express by sunwing

1.800.309.4717

Trip Information

Booking #: 2798986 Active
Lead Name: WADE/NATHAN J
 # Passengers: 2
Departure Date: 01 Nov 22
Created: 04 Oct 22
Document Status: R:2022-10-11

Contact Information

Client: THE CRUISE AUTHORITY
Phone: 770-952-8300
Contact: DANET TRAFTON

Payment Information

Total Price: $3835.26
Total Received: $3621.44
Final Payment Due: 04 Oct 22 - $213.82
Total Due: $213.82

Package Summary

Names must match passport. No name changes/corrections allowed.

Passenger Name	D.O.B.	Gender	Flight Itin	Departure City
NATHAN J WADE	[redacted]	M	4Y7U4A	MIA
FANI T WILLIS	[redacted]	F	4Y7U4A	MIA

Selected Flight

Departure	Date	Time	Flight Info	Class	Stops	Seats
Miami (MIA) - Aruba (AUA)	01 Nov 22	10:30AM - 1:29PM	American Airlines # 1028	M	0	32A, 28D
Aruba (AUA) - Miami (MIA)	04 Nov 22	3:04PM - 6:06PM	American Airlines # 1036	N	0	32E, 32F

Roundtrip air transportation from Miami to Aruba on Tuesday Nov. 01, 2022 for 3 nights for 2 people.

Selected Hotel

Hyatt Regency Aruba Resort and Casino ★★★★½

- 3 nights accommodations for 2 adults occupying 1 room
- One King Resort and Ocean View Room European Plan
- Check in Date: 01 Nov 2022, Check out Date: 04 Nov 2022
- Includes Aruba Sale, Includes Taxes and Fees! - Book your stay today!

Services

Electronic Documents
Travel Protection Declined
Round-Trip Shared Transfers AUA

Urgent Action Needed - If this booking is for travel within 10 days action required by 3pm EST (If booked after 3pm, send by 9am EST next morning):

- Please submit to verify@vacationexpress.com the following documents:
  - A completed Credit Card Authorization Form
  - A scanned copy of the Credit Card used for payment with only the last 4 digits showing
  - A scanned copy of State identification (or passport photo page) for the credit card holder

vacation express by sunwing

IMPORTANT TRAVEL DOCUMENTS

1.800.309.4717

Dear NATHAN J WADE
FANI T WILLIS

Vacation Express Reservation #: 2798986

Package Summary

Selected Flight

Departure	Date	Time	Flight Info	Class	Stops	Seats
-	01 Jan 00	0:00AM-0:00AM	, #		0	

#Error

Selected Hotel - Hyatt Regency Aruba Resort and Casino

- **3 nights accommodations for 2 adults occupying 1 room**
- **One King Resort and Ocean View Room European Plan**
- **Check in Date: 01 Nov 2022, Check out Date: 04 Nov 2022**
- **Includes Aruba Sale, Includes Taxes and Fees! - Book your stay today!**

Selected Additional Services

- Electronic Documents
- Travel Protection Declined
- Round-Trip Shared Transfers AUA

Hotel Information

Hotel Name: Hyatt Regency Aruba Resort and Casino
Address: J.E. Irausquin Blvd #85
Palm Beach, Dutch Caribbean Aruba
Local Phone: 011 (297) 586-1234

Reservation # 2798986
Voucher Print Date: Tue Jan 23, 2024
Client Names: NATHAN J WADE
FANI T WILLIS
Clients of: THE CRUISE AUTHORITY

Arrival Date: Tue Nov 01, 2022
Departure Date: Fri Nov 04, 2022
Accommodations: 1 room(s), One King Resort and Ocean View Room European Plan
Special Codes: RFILL (Aruba Sale, Includes Taxes and Fees!)

Check-in: 4PM Check-out: 11AM Guests must present a credit card or a cash deposit at check-in to charge incidentals to their room during their stay.

vacation express by sunwing

IMPORTANT TRAVEL DOCUMENTS

1.800.309.4717

IMPORTANT INFORMATION ABOUT YOUR VACATION:

If you would like information on cancelling or rescheduling your vacation with Vacation Express, please visit the Vouchers, Rebooking & Extending page linked in the footer of our website.

Travel Hints: Your hotel may require a credit card or cash deposit for incidentals such as phone calls. Check-in time at most hotels is 3pm and check out time is 11am. If your room is not available upon arrival, the hotel will store your luggage for you. Most hotels provide a changing area for early arrivals or late departures.

Vacation Protection Plan: If you have purchased one of our Vacation Protection Plans, details of coverage can be obtained online at www.vacationexpress.com/vacation-protection/. If your reservation involves scheduled airline tickets, it is imperative that your reservation be canceled with the respective airline a minimum of one hour prior to departure. Failure to cancel the airline reservation will result in forfeit of all air credits associated with your airline ticket.

Denied Boarding Information: Don't Let This Happen to You! . .
Check in for international flights begins 3 hours prior to departure. You must check in no later than 2 hours prior to departure or risk denied boarding. No passengers can be accepted for check in less than 60 minutes prior to flight time. You must present yourself at the boarding gate at least 30 minutes prior to departure. A valid passport is required for all passengers (including infants) on all international flights. Passport Cards are not valid for air travel to Mexico or the Caribbean. Some countries require that passports be valid for 6 months beyond your scheduled travel dates. Non-US citizens may also require a visa for travel on Vacation Express packages. Check with the consulate of your intended destination as well as the US to ensure that you have proper documents to travel. Some countries require a single parent traveling with minor children (or minors traveling alone) to present additional documents (notarized permission letter, death certificate, sole custody papers or "father unknown" documents) to enter the country.

Luggage: Most airlines now charge for checked baggage and some are now even charging for carry-on items. Contact your carrier for details on their charges for personal luggage items.

Assistance in Destination: While on vacation, a destination representative is available to you. Take a few minutes to meet your destination representative and benefit from expert local knowledge. For your convenience, a Vacation Express binder is available at your hotel in the hospitality desk area. This binder provides you with destination and local contact information for your representative and local office in case you need assistance during your stay. In most destinations, NexusTours is the Vacation Express representative. Their representatives are available to assist you via telephone 24/7 or in person at your resort throughout your vacation. We strongly recommend you locate the representative at your hotel where you can benefit from their expert, local knowledge. Optional excursions and special offers are available through your rep and we highly recommend you book all tours and activities through NexusTours to ensure the highest quality and value for money.

For assistance on your departure date please call 800-309-4717 and follow the prompts for Day of Departure assistance. For assistance while in destination, please email the Vacation Express Travel Support team at travelsupport@vacationexpress.com. Travel Support hours of operation are 8 am ET to 8 pm ET, 7 days a week.

Hotel Cancellation Penalties: We understand the unexpected can happen and choosing to cancel your vacation is never an easy decision. For that reason, we are providing you with a chart of estimated cancellation penalties for our partner hotels. Visit https://www.vacationexpress.com/hotel-cancellations/ for more details.

Flight Information: We highly recommend that travelers visit their air carrier's website to sign up for travel alerts. This is to ensure that you receive the most up-to-date flight information such as schedule changes and safety precautions.

vacation express by sunwing

IMPORTANT TRAVEL DOCUMENTS

1.800.309.4717

Dear NATHAN J WADE
FANI T WILLIS

Vacation Express Reservation #: 2798986

Package Summary

Selected Flight

Departure	Date	Time	Flight Info	Class	Stops	Seats
-	01 Jan 00	0:00AM-0:00AM	' #		0	

#Error

Selected Hotel - Hyatt Regency Aruba Resort and Casino

- **3 nights accommodations for 2 adults occupying 1 room**
- **One King Resort and Ocean View Room European Plan**
- **Check in Date: 01 Nov 2022, Check out Date: 04 Nov 2022**
- **Includes Aruba Sale, Includes Taxes and Fees! - Book your stay today!**

Selected Additional Services

- Electronic Documents
- Travel Protection Declined
- Round-Trip Shared Transfers AUA

Hotel Information

Hotel Name: Hyatt Regency Aruba Resort and Casino
Address: J.E. Irausquin Blvd #85
Palm Beach, Dutch Caribbean Aruba
Local Phone: 011 (297) 586-1234

Reservation # 2798986
Voucher Print Date: Tue Jan 23, 2024
Client Names: NATHAN J WADE
FANI T WILLIS
Clients of: THE CRUISE AUTHORITY

Arrival Date: Tue Nov 01, 2022
Departure Date: Fri Nov 04, 2022
Accommodations: 1 room(s), One King Resort and Ocean View Room European Plan
Special Codes: RFILL (Aruba Sale, Includes Taxes and Fees!)

Check-in: 4PM Check-out: 11AM Guests must present a credit card or a cash deposit at check-in to charge incidentals to their room during their stay.

vacation express by sunwing

IMPORTANT TRAVEL DOCUMENTS

1.800.309.4717

Transfer Information

Name:	Vacation Express (represented by Nexus Tours/El Tours)	**Reservation #**	2798986
Address:	Ing. Luymesstraat 6 Spaans Lagoen Aruba	**Voucher Print Date:**	Tue Jan 23, 2024
Local Phone:	297.594.4277	**Client Names:**	NATHAN J WADE FANI T WILLIS
		Clients of:	THE CRUISE AUTHORITY

Date/Service: Tue Nov 01, 2022 - MIA-AUA - AA 1028 @ 1:29PM to Hyatt Regency Aruba Resort and Casino, Round-Trip Shared Transfers

Departure Date: Fri Nov 04, 2022 - Hyatt Regency Aruba Resort and Casino to AUA-MIA - AA 1036 @ 3:04PM

Xhub is not available for Contracted Groups under one booking number.

Pre-Arrival Info: Sign up for NexusTours Xperiences Hub online to get your Airport Transfer Pass (arrival and departure), access to the Virtual Concierge and easy access to crucial destination information. Visit eh.nexustours.com and use your Vacation Express booking number to register your preferred method of communication (Whats App, SMS/Text Messaging and Email) while in destination.

Arrival Information: Pass through passport control, collect your bags and proceed through customs. Proceed directly to the EXIT. Immediately outside the door, you will see the Vacation Express/NexusTours reps wearing orange shirts, displaying branded signage and ready to escort you to the transportation to your resort.

Nexus representatives are available to assist you 24/7. We recommend you attend the Welcome Orientation, either virtually or in person at your resort, where you can benefit from their expert local knowledge. Optional excursions and special offers are also available. We highly recommend you book all excursions through NexusTours to ensure the highest quality and value.

Your return transfer info will be provided 48hrs prior to departure via the communication method you indicated using the NexusTours Xperiences Hub. If you did not register, you will be contacted by phone in your room so please check for messages. You may also call the 24/7 phone number listed below to reconfirm your return transfer pick up time.

Emergency Number: If you require assistance with your hotel/airport transfer contact NexusTours at: 9am-5pm local time 585-6730, 24/7 from Aruba 592-2952 or 592-2982 or 24/7 from a U.S. phone 1-855-706-3987.

vacation express by sunwing

IMPORTANT TRAVEL DOCUMENTS

1.800.309.4717

IMPORTANT INFORMATION ABOUT YOUR VACATION:

If you would like information on cancelling or rescheduling your vacation with Vacation Express, please visit the Vouchers, Rebooking & Extending page linked in the footer of our website.

Travel Hints: Your hotel may require a credit card or cash deposit for incidentals such as phone calls. Check-in time at most hotels is 3pm and check out time is 11am. If your room is not available upon arrival, the hotel will store your luggage for you. Most hotels provide a changing area for early arrivals or late departures.

Vacation Protection Plan: If you have purchased one of our Vacation Protection Plans, details of coverage can be obtained online at www.vacationexpress.com/vacation-protection/. If your reservation involves scheduled airline tickets, it is imperative that your reservation be canceled with the respective airline a minimum of one hour prior to departure. Failure to cancel the airline reservation will result in forfeit of all air credits associated with your airline ticket.

Denied Boarding Information: **Don't Let This Happen to You! . .**
Check in for international flights begins 3 hours prior to departure. You must check in no later than 2 hours prior to departure or risk denied boarding. No passengers can be accepted for check in less than 60 minutes prior to flight time. You must present yourself at the boarding gate at least 30 minutes prior to departure. A valid passport is required for all passengers (including infants) on all international flights. Passport Cards are not valid for air travel to Mexico or the Caribbean. Some countries require that passports be valid for 6 months beyond your scheduled travel dates. Non-US citizens may also require a visa for travel on Vacation Express packages. Check with the consulate of your intended destination as well as the US to ensure that you have proper documents to travel. Some countries require a single parent traveling with minor children (or minors traveling alone) to present additional documents (notarized permission letter, death certificate, sole custody papers or "father unknown" documents) to enter the country.

Luggage: Most airlines now charge for checked baggage and some are now even charging for carry-on items. Contact your carrier for details on their charges for personal luggage items.

Assistance in Destination: While on vacation, a destination representative is available to you. Take a few minutes to meet your destination representative and benefit from expert local knowledge. For your convenience, a Vacation Express binder is available at your hotel in the hospitality desk area. This binder provides you with destination and local contact information for your representative and local office in case you need assistance during your stay. In most destinations, NexusTours is the Vacation Express representative. Their representatives are available to assist you via telephone 24/7 or in person at your resort throughout your vacation. We strongly recommend you locate the representative at your hotel where you can benefit from their expert, local knowledge. Optional excursions and special offers are available through your rep and we highly recommend you book all tours and activities through NexusTours to ensure the highest quality and value for money.

For assistance on your departure date please call 800-309-4717 and follow the prompts for Day of Departure assistance. For assistance while in destination, please email the Vacation Express Travel Support team at travelsupport@vacationexpress.com. Travel Support hours of operation are 8 am ET to 8 pm ET, 7 days a week.

Hotel Cancellation Penalties: We understand the unexpected can happen and choosing to cancel your vacation is never an easy decision. For that reason, we are providing you with a chart of estimated cancellation penalties for our partner hotels. Visit https://www.vacationexpress.com/hotel-cancellations/ for more details.

Flight Information: We highly recommend that travelers visit their air carrier's website to sign up for travel alerts. This is to ensure that you receive the most up-to-date flight information such as schedule changes and safety precautions.

vacation express by sunwing

1.800.309.4717

Trip Information

Booking #: 2798986 Active
Lead Name: WADE/NATHAN J
 # Passengers: 2
Departure Date: 01 Nov 22
Created: 04 Oct 22
Document Status: R:2022-10-11

Contact Information

Client: THE CRUISE AUTHORITY
Phone: 770-952-8300
Contact: DANET TRAFTON

Payment Information

Total Price: $3835.26
Total Received: $3621.44
Final Payment Due: 04 Oct 22 - $213.82
Total Due: $213.82

Package Summary

Names must match passport. No name changes/corrections allowed.

Passenger Name	D.O.B.	Gender	Flight Itin	Departure City
NATHAN J WADE	[redacted]	M	4Y7U4A	MIA
FANI T WILLIS	[redacted]	F	4Y7U4A	MIA

Selected Flight

Departure	Date	Time	Flight Info	Class	Stops	Seats
Miami (MIA) - Aruba (AUA)	01 Nov 22	10:30AM - 1:29PM	American Airlines # 1028	M	0	32A, 28D
Aruba (AUA) - Miami (MIA)	04 Nov 22	3:04PM - 6:06PM	American Airlines # 1036	N	0	32E, 32F

Roundtrip air transportation from Miami to Aruba on Tuesday Nov. 01, 2022 for 3 nights for 2 people.

Selected Hotel

Hyatt Regency Aruba Resort and Casino ★★★★½

- 3 nights accommodations for 2 adults occupying 1 room
- One King Resort and Ocean View Room European Plan
- Check in Date: 01 Nov 2022, Check out Date: 04 Nov 2022
- Includes Aruba Sale, Includes Taxes and Fees! - Book your stay today!

Services

Electronic Documents
Travel Protection Declined
Round-Trip Shared Transfers AUA

Urgent Action Needed - If this booking is for travel within 10 days action required by 3pm EST (If booked after 3pm, send by 9am EST next morning):

- Please submit to verify@vacationexpress.com the following documents:
  - A completed Credit Card Authorization Form
  - A scanned copy of the Credit Card used for payment with only the last 4 digits showing
  - A scanned copy of State identification (or passport photo page) for the credit card holder

Please visit https://www.vacationexpress.com/terms/ to review the Terms & Conditions.

Please review the Conditions of Carriage at: https://www.vacationexpress.com/conditions-of-carriage/

For information on airline fees for baggage & other services, please visit https://www.vacationexpress.com/baggage/

All prices are in US Dollars.

Airline Ticket Validity:
Airlines have different rules when it comes to rebooking a cancelled ticket. In most cases with American, United, Delta, JetBlue, Sun Country and Alaska Airlines you must commence travel within one year from the date the ticket was issued (not your original travel date). Tickets on Frontier Airlines and Spirit Airlines must be rebooked within 90 days from the cancellation date for travel on any other date available in their system. Cancelled tickets on Southwest that were unexpired or created on or after July 28, 2022, have no expiration date.

Please Note: 1) Since COVID, airlines may have more flexible terms depending on when your ticket was booked or when you were scheduled to travel. **2)** Some airlines may charge a change fee. **3)** Basic Economy tickets are highly restrictive and generally do not have any value when cancelled. For exceptions, questions and terms related to rebooking your specific ticket please contact the airline directly.

Airline Schedule Changes for Commercial Flights Purchased through Vacation Express:
If your airline changes their schedule 31 days or more prior to your trip, please email schedulechange@vacationexpress.com. If your airline changes their schedule 30 days or less prior to your trip, you should call us to address the issue immediately.

Insurance:
If you did not add insurance at time of booking, but want to add it at a later time, you must call in to our Contact Center. VPP must be added prior to final payment. VPP+ or VPI (only offered on a very limited scale) must be added within 7 days of deposit or prior to final payment due date whichever comes first.

Insurance and Reduced Deposit Plan (RDP):
If you selected the RDP and the VPP insurance plan and you have to cancel your booking, you must pay for the full value of the airline ticket prior to receiving your ticket for future use. In addition, the $25 RDP fee and any insurance, if applicable, must be paid in full and is not refundable.

Travel Documents:
Travel Documents are released and issued via email 21 days prior to departure. Please check your spam folder if you did not receive your documents or you may retrieve them online in your booking under Options.

Seat Assignments and Other Airline Matters:
If you booked a ticket using a scheduled airline, seat assignments or bags must be made/purchased on the airline's website directly. Vacation Express does not book seats or bags. You can access your booking online at the airline's website using the **Airline Record Locator** number (or Reservation Code) that is listed on your Invoice and Travel Documents. If you booked one of our VE Exclusive Non-Stop flights, you can add seat assignments and purchase bags in advance, online under Options in your booking.

Transfers with Hotel-Only Bookings:
You must provide us with your flight information no later than 7 days prior to arrival in destination in order for the transfer company to be able to schedule your hotel transfer. If your Travel Documents show "pick up not available" then that means that we have not received your flight information. You may add your flight info in your booking online under Services and Transfer Details.

Hotel Requests:
We cannot guarantee bedding! Bedding is only guaranteed when the room category has the bedding in the name. Any special requests made for your hotel stay whether related to bedding, views, location, etc. are always on request. We highly suggest that you reach out to the hotel directly prior to arrival to notify them of any requests you may have.

Transportation in Destination:
In most destinations, transfers and representation are offered by Nexus Tours. Your Travel Documents will list all the necessary information regarding your transfers and any helpful hints related to that.

Hotel Cancellation Info:
We understand the unexpected can happen and choosing to cancel your vacation is never an easy decision. For that reason, we are providing you with a chart of estimated cancellation penalties for our partner hotels. Visit https://www.vacationexpress.com/hotel-cancellations/ for more details.

CHANGE FEES:

Exclusive Non-Stop Flights (changes to destination or travel dates)

- Up to 31+ days prior to departure $50 per person plus applicable airline/hotel/feature penalties or fees.
- 30-7 days prior to departure $150 per person plus applicable airline/hotel/feature penalties or fees. There is no ticket residual value.
- 6-0 days prior to departure non-changeable
- * change of travel date must be within same calendar year of original travel dates.

Exclusive Non-Stop Flights (changes to passenger name)

- Up to 7+ days prior to departure $50 per person or up to $100 per room plus applicable airline/hotel/feature penalties or fees.
- 6-0 days prior to departure non-changeable

Scheduled Air Packages (any changes other than minor changes)

- Up to 31+ days prior to departure $25 per person or up to $100 per room plus applicable airline/hotel/feature penalties or fees.
- 30-3 days prior to departure $50 per person or up to $100 per room plus applicable airline/hotel/feature penalties or fees.
- 2-0 days prior to departure $75 per person plus applicable airline/hotel/feature penalties or fees.

Hotel Only (any changes other than minor changes)

- Up to 3+ days prior to departure $25 per room plus applicable airline/hotel/feature penalties or fees.
- 2-0 days prior to departure $50 per room plus applicable airline/hotel/feature penalties or fees.

In-Destination Voluntary Change Fees:

- Re-issuing of airline tickets: $75 per person plus applicable airline fees
- Hotel extensions and deviations: $75 per room plus applicable hotel fees.
- Transfers are non-refundable and non-changeable inside 48hrs. New transfers must be purchased directly from Nexus Tours.

Minor Changes (all packages):

- Up to 7+ days prior to departure no VE change fee for minor name correction (does not apply to name corrections for airline tickets that require re-issuing of a ticket), adding passenger, change to higher-priced hotel or room category. Airline/hotel/feature penalties, charges and price increases still apply.

CANCELLATION FEES:

Exclusive Non-Stop Flight Package or Air Only

- Up to 31+ days prior to departure $125 per person plus applicable hotel/feature penalties.
- 30-15 days prior to departure $225 per person plus applicable hotel/feature penalties.
- 14-0 days prior to departure non-refundable.

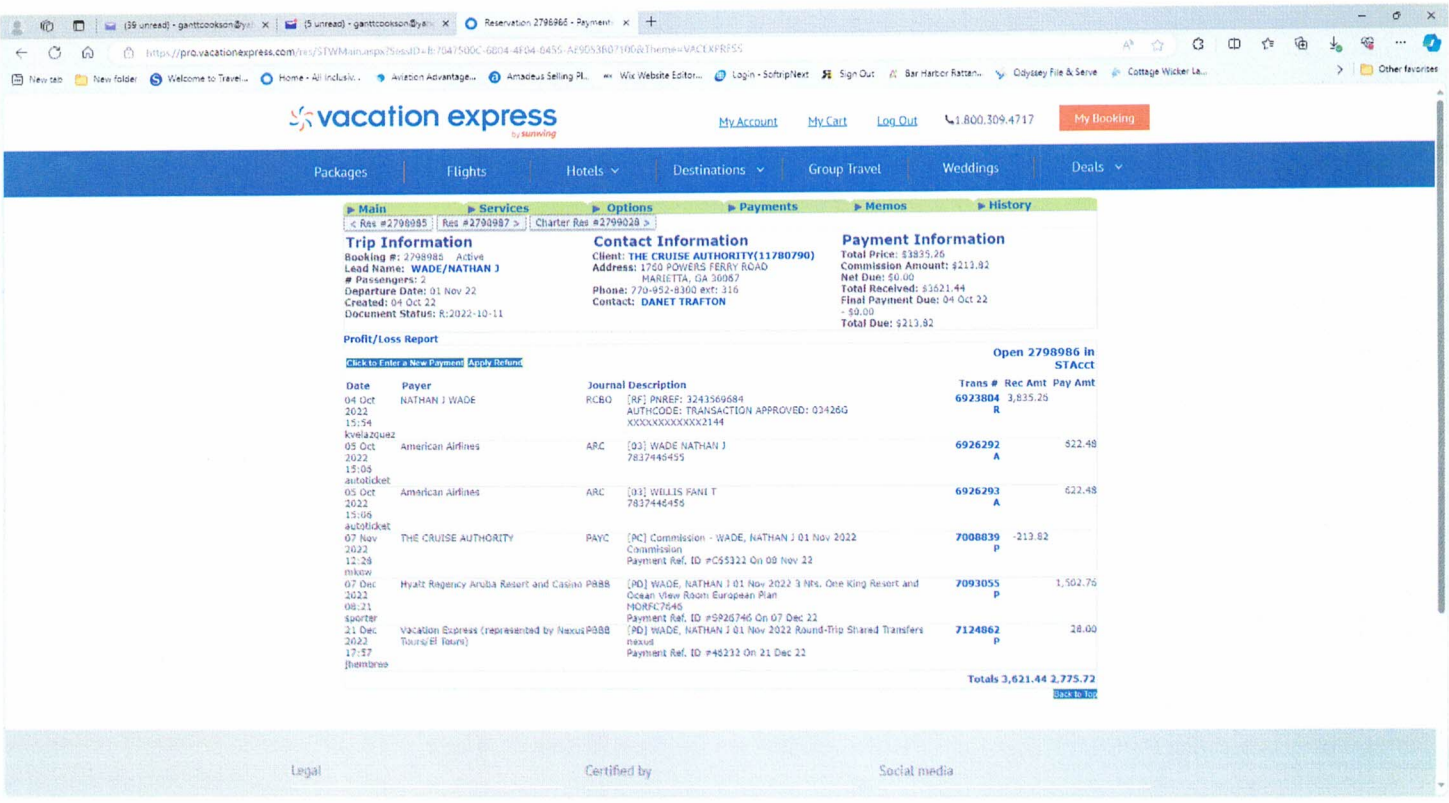
Scheduled Air Packages

- 3+ days prior to departure $50 per person plus applicable hotel/feature penalties. Airfare is non-refundable.
- 2-0 days prior to departure $75 per person plus applicable hotel/feature penalties. Airfare is non-refundable.

Hotel Only

- 3+ days prior to departure $25 per room plus applicable hotel/feature penalties
- 2-0 days prior to departure $50 per room plus applicable hotel/feature penalties.

Passenger Information with regards to rights under the Canadian Air Passenger Protection Regulations: SOR/2019-150
If you are travelling to or from a Canadian airport and are denied boarding or your baggage is lost or damaged, you may be entitled to certain standards of treatment and compensation under the Canadian Air Passenger Protection Regulations. For more information about your passenger rights please contact your operating airline or visit the website of the Canadian Transportation Agency (CTA).



vacation express
by sunwing

My Account | My Cart | Log Out | 1.800.309.4717 | My Booking

Packages | Flights | Hotels | Destinations | Group Travel | Weddings | Deals

▶ Main | ▶ Services | ▶ Options | ▶ Payments | ▶ Memos | ▶ History

< Res #2798985 | Res #2798987 > | Charter Res #2799028 >

Trip Information

Booking #: 2798985 Active
Lead Name: WADE/NATHAN J
 # Passengers: 2
Departure Date: 01 Nov 22
Created: 04 Oct 22
Document Status: R:2022-10-11

Contact Information

Client: THE CRUISE AUTHORITY(11780790)
Address: 1760 POWERS FERRY ROAD
MARIETTA, GA 30067
Phone: 770-952-8300 ext: 316
Contact: DANET TRAFTON

Payment Information

Total Price: $3835.26
Commission Amount: $213.82
Net Due: $0.00
Total Received: $3621.44
Final Payment Due: 04 Oct 22
- $0.00
Total Due: $213.82

Profit/Loss Report

Click to Enter a New Payment | Apply Refund

Open 2798986 in STAcct

Date	Payer		Journal Description	Trans #	Rec Amt	Pay Amt
04 Oct 2022 15:54 kvelazquez	NATHAN J WADE	RCBO	[RF] PNREF: 3243569684 AUTHCODE: TRANSACTION APPROVED: 034266 XXXXXXXXXXXX2144	6923804 R	3,835.26	
05 Oct 2022 15:06 autoticket	American Airlines	ARC	[03] WADE NATHAN J 7837446455	6926292 A		622.48
05 Oct 2022 15:06 autoticket	American Airlines	ARC	[03] WELLIS FANI T 7837446456	6926293 A		622.48
07 Nov 2022 12:28 mkow	THE CRUISE AUTHORITY	PAYC	[PC] Commission - WADE, NATHAN J 01 Nov 2022 Commission Payment Ref. ID #C65122 On 08 Nov 22	7008839 P	-213.82	
07 Dec 2022 08:21 sporter	Hyatt Regency Aruba Resort and Casino	PBBB	[PD] WADE, NATHAN J 01 Nov 2022 3 Nts. One King Resort and Ocean View Room European Plan MORFC7646 Payment Ref. ID #9926746 On 07 Dec 22	7093055 P		1,502.76
21 Dec 2022 17:57 jhembree	Vacation Express (represented by Nexus Tours/El Tours)	PBBB	[PD] WADE, NATHAN J 01 Nov 2022 Round-Trip Shared Transfers nexus Payment Ref. ID #48213 On 21 Dec 22	7124862 P		28.00
				Totals	3,621.44	2,775.72

Back to Top

Legal | Certified by | Social media