



January 19, 2021

VIA ELECTRONIC MAIL

Attn: Jotonna Tulloch
Open Records Custodian
40 Capitol Square SW
Atlanta, GA 30334
open_records@law.ga.gov

Re: Public Information Request

Dear Records Custodian:

Pursuant to the Georgia Open Records Law (O.C.G.A. § 50-18-70 *et seq.*), American Oversight makes the following request for records.

Requested Records

American Oversight requests that the Office of the Attorney General produce the following within three business days:

1. All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) and text message threads/conversations between (a) any of the state officials listed in Column A below, and (b) any of the external individuals identified in Column B below:

Column A: Georgia State Officials	Column B: External Individuals & Entities
<ol style="list-style-type: none"> 1. Christopher Carr, Attorney General, or anyone communicating on his behalf (such as a scheduler or assistant) 2. Travis Johnson, Chief of Staff 3. W. Wright Banks, Jr., Chief Deputy, or anyone serving as Chief Deputy 4. Katie Byrd, Director of Communications 	<ol style="list-style-type: none"> 1. Adam Piper, Executive Director (including, but not limited to, at apiper@republicanags.com or adam Piper 1@gmail.com) 2. Eric Schmitt, Missouri Attorney General (including, but not limited to, at ag@ago.mo.gov) 3. Steve Marshall, Alabama Attorney General (including, but not limited to, at steve.marshall@alabamaag.gov) 4. Any employee or representative of the Republican Attorneys General Association (including, but not limited to, anyone communicating from an email address ending in @republicanags.com)



	<p>5. Any employee or representative of the Rule of Law Defense Fund (including, but not limited to, anyone communicating from an email address ending in @rldf.org or @ruleoflawdefensefund.org)</p>
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2. All (a) email communications (including emails, complete email chains, calendar invitations, and attachments thereto) sent by and (b) text message threads/conversations sent or received by any of the individuals specified in Column A, above, that contain any of the key terms listed below:

Search Terms:

- i. "Rule of Law"
- ii. RLDF
- iii. "Republican Attorneys General Association"
- iv. RAGA
- v. "Save America"
- vi. "stop the steal"
- vii. Patriot
- viii. Patriots
- ix. "election fraud"
- x. "integrity of our election"
- xi. "election integrity"
- xii. Rally
- xiii. MAGA
- xiv. "great again"
- xv. Piper

For item 2(a) of this request, in an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited its request to emails sent by the specified officials in the Office of the Attorney General. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both sent and received messages. This means, for example, that both Attorney General Carr's response to an email containing one of the key terms listed above and the initial received message are responsive to this request and should be produced.

For item 2(b) of this request, American Oversight requests that complete text message threads/conversations be produced. This means, for example, that if Attorney General Carr sent or received a text message containing any of the key terms listed above, American Oversight requests that the complete text conversation for the timeframe listed below should be produced, and not just the message containing the key term.

For both items of this request, please provide all responsive records from November 3, 2020, to the date the request is received.

Please notify American Oversight of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fees.

American Oversight insists that your office use the most up-to-date technologies to search for responsive information and take steps to ensure that the most complete repositories of information are searched. American Oversight is available to work with you to craft appropriate search terms. **However, custodian searches are still required; your office may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.**

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

Please take appropriate steps to ensure that records responsive to this request are not deleted by your office before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, we can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or in PDF or TIF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

Conclusion

American Oversight is a 501(c)(3) nonprofit with the mission to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.¹

¹ American Oversight currently has approximately 15,600 page likes on Facebook and 105,900 followers on Twitter. American Oversight, Facebook,

We share a common mission to promote transparency in government. American Oversight looks forward to working with you on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully releasing the requested records, please contact Khahilia Shaw at records@americanoversight.org or 202.539.6507.

Sincerely,

A handwritten signature in blue ink that reads "Austin R. Evers". The signature is fluid and cursive, with a long horizontal line extending to the left.

Austin R. Evers
Executive Director
American Oversight

<https://www.facebook.com/weareoversight/> (last visited Jan. 8, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Jan. 8, 2021).