



June 16, 2021

VIA EMAIL

Attn: Jotonna Tulloch
Open Records Officer
Georgia Department of Law
40 Capitol Square SW
Atlanta, GA 30334
open_records@law.ga.gov

Re: Open Records Request

Dear Records Officer Tulloch:

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 Georgia Department of Law produce the following within three business days:

1. All email communications (including emails, email attachments, calendar invitations, and attachments thereto) between (a) Attorney General Chris Carr, or anyone communicating on his behalf (such as an assistant or scheduler), and (b) any representatives of the organizations listed below (including, but not limited to, anyone communicating from an email address ending with the listed domains), or any individual listed below:

External Entities:

- i. The Concord Fund
- ii. CRC Advisors (crcadvisors.com), CRC Strategies (crcpublicrelations.com), Leonard Leo, Jonathan Bunch, and Greg Mueller
- iii. Judicial Crisis Network (judicialnetwork.com), Daniel Casey, Gary Marx, and Carrie Severino
- iv. Honest Elections Project (honestelections.org) and Jason Snead
- v. U.S. Chamber of Commerce and US. Chamber Institute for Legal Reform (uschamber.com)
- vi. Koch Industries (kochind.com) and Koch Companies Public Sector (kochps.com), David Dunlap, Mike Morgan, Mark Nichols, Paul Brown, Philip Ellender, Steve Lombardo, Dale Gibbens, James Robert, John "Trip" Martin, Lauren Wilkes Fralick, Arthur "Skin" Edge, John Bozeman, Allen Richardson, and Boyd Pettit
- vii. Americans for Prosperity (afphq.org and americansforprosperity.org), Tim Phillips, and Emily Seidel



- viii. Melaleuca (melaleuca.com) and Frank VanderSloot
- ix. Altria Group (altria.com), and Phillip Morris (pmi.com)
- x. Mallinckrodt Pharmaceuticals (mallinckrodt.com)
- xi. Juul Labs (juul.com and juullabs.com)
- xii. Ariel Corporation (arielcorp.com), Thomas Rastin, and Karen Wright
- xiii. Las Vegas Sands (sands.com and lasvegassands.com), Marina Bay Sands (marinabaysands.com), The Venetian Resort (venetian.com), Sheldon Adelson, Miriam Adelson, Robert Goldstein, Patrick Dumont, Randy Hyzak, Lawrence “Lon” Jacobs, Robert Hayden, Betty Yurcich, and Andy Abboud
- xiv. Mountaire Farms (mountaire.com), Ronald Cameron, and Kevin Garland
- xv. Ace Cash Express (acecashexpress.com), Jay Shipowitz, and Eric Norrington
- xvi. Peter Thiel
- xvii. C. Boyden Gray
- xviii. Rex Sinquefield

2. All email communications (including emails, email attachments, calendar invitations, and attachments thereto) sent or received by Attorney General Chris Carr, or anyone communicating on his behalf (such as an assistant or scheduler), containing any of the following search terms:

Search Terms:

- i. “Concord Fund”
- ii. “Institute for Legal Reform”
- iii. ILR
- iv. “Koch Industries”
- v. “Koch Companies”
- vi. Mallinckrodt
- vii. Juul
- viii. Altria
- ix. Adelson
- x. Thiel
- xi. “Boyden Gray”
- xii. “Leonard Leo”
- xiii. “Jonathan Bunch”
- xiv. “Greg Mueller”
- xv. JCN
- xvi. “Judicial Crisis”
- xvii. “Gary Marx”
- xviii. “Daniel Casey”
- xix. “Carrie Severino”
- xx. “Honest Elections Project”
- xxi. Snead
- xxii. “Ariel Corp.”
- xxiii. “Ariel Corporation”
- xxiv. VanderSloot

- xxv. Melaleuca
- xxvi. Mountaire
- xxvii. “Ronald Cameron”
- xxviii. “Ronnie Cameron”
- xxix. “Ron Cameron”
- xxx. “Ace Cash”
- xxx. Sinquefield

For both items of this request, please provide all responsive records from January 1, 2020, to the date the request is received by your office.

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

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Open Records Act.¹
- 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 a request is denied in whole, please state specifically why 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 the agency 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.

¹ O.C.G.A. § 50-18-70(b)(2).

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. 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, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF 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.²

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,

/s/ Khahilia Shaw
Khahilia Shaw
on behalf of
American Oversight

² American Oversight currently has approximately 15,670 page likes on Facebook and 106,200 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited May 25, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited May 25, 2021).