



July 29, 2019

VIA CERTIFIED MAIL

Open Records Custodian
Office of the Governor
206 Washington Street
111 State Capitol
Atlanta, Georgia 30334

Re: Open Records Request

Dear Records Custodian:

Pursuant to the Georgia Open Records Law, as codified at O.C.G.A. § 50-18-70 et seq., American Oversight makes the following request for public records.

Requested Records

American Oversight requests that the Office of the Governor produce the following within three business days, or provide a written description of any responsive records with a timetable for their production within three business days:

Records sufficient to identify any costs that have been incurred by the Georgia government (including through reimbursement or direct payments) in connection with visits by Governor Brian Kemp and accompanying staff, including but not limited to security personnel, to any of the Trump Organization Properties listed below. Records reflecting any associated costs—such as expenses related to security, dining, incidentals, or lodging—are responsive to this request.

- i. Trump International Hotel, D.C.
- ii. The Mar-A-Lago Club, Palm Beach
- iii. Trump International Hotel and Tower, New York
- iv. Trump National Doral, Miami
- v. Trump International Hotel and Tower, Chicago
- vi. Trump National Golf Club, D.C.
- vii. Trump International Hotel, Waikiki
- viii. Trump National Golf Course Bedminster, New Jersey
- ix. Trump International Hotel, Las Vegas
- x. Albemarle Estate, Charlottesville

Please provide all responsive records from January 14, 2019, through the date a search is conducted.



American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term “record” in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

In addition, 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; governmental authorities may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.**

Please search all records regarding official business, **including files or emails in the personal custody of your officials, such as personal email accounts.**

If this request is denied in whole or in part, we ask that you cite in writing the specific statutory exemption upon which you rely, as required by law. 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 and 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, American Oversight and your office 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

We share a common mission to promote transparency in government. American Oversight looks forward to working with your office 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 Katherine Anthony at foia@americanoversight.org or 202.897.3918.

Sincerely,

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

Austin R. Evers
Executive Director
American Oversight