



April 21, 2023

**VIA EMAIL**

Attn: Jotonna Tulloch  
Open Records Officer  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, GA 30334  
[open\\_records@law.ga.gov](mailto:open_records@law.ga.gov)

**Re: Open Records 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 Georgia Department of Law produce the following within three business days:

All text messages or messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, Twitter direct messages, Facebook messages, WhatsApp, Signal, Telegram, or Parler) between (a) Attorney General Chris Carr, or anyone communicating on his behalf such as an assistant or scheduler, and (b) any of the following individuals:

1. Alabama Attorney General Steve Marshall
2. Montana Attorney General Austin Knudsen
3. Mississippi Attorney General Lynn Fitch
4. Alaska Attorney General Treg Taylor
5. Arkansas Attorney General Tim Griffin
6. Former Arkansas Attorney General Leslie Rutledge
7. Florida Attorney General Ashley Moody
8. Idaho Attorney General Raul Labrador
9. Former Idaho Attorney General Lawrence Wadson
10. Indiana Attorney General Todd Rokita
11. Iowa Attorney General Brenna Bird
12. Kansas Attorney General Kris Kobach
13. Former Kansas Attorney General Derek Schmidt
14. Kentucky Attorney General Daniel Cameron
15. Louisiana Attorney General Jeff Landry
16. Missouri Attorney General Andrew Bailey
17. Nebraska Attorney General Mike Hilgers
18. Former Nebraska Attorney General Doug Peterson



19. New Hampshire Attorney General John Formella
20. North Dakota Attorney General Drew Wrigley
21. Ohio Attorney General David Yost
22. Oklahoma Attorney General Genter Drummond
23. Former Oklahoma Attorney General John O'Connor
24. South Carolina Attorney General Alan Wilson
25. South Dakota Attorney General Marty Jackley
26. Former South Dakota Attorney General Mark Vargo
27. Former South Dakota Attorney General Jason Ravnsborg
28. Tennessee Attorney General Jonathan Skrmetti
29. Former Tennessee Attorney General Herbert Slatery
30. Texas Attorney General Ken Paxton
31. Utah Attorney General Sean Reyes
32. Virginia Attorney General Jason Miyares
33. West Virginia Attorney General Patrick Morrisey
34. Wyoming Attorney General Bridget Hill

Please provide all responsive records from January 1, 2022, through the date the request is received.

**To the extent your search requires specific phone numbers for the external individuals listed above, please use the individual's first and last name as a search term. For example, a search for text messages between Attorney General Carr, or anyone communicating on his behalf, and Alabama Attorney General Steve Marshall would be conducted by searching Attorney General Carr's text messages using the key term "Steve Marshall."**

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:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks "communications," please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- 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.<sup>1</sup>

- 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.

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.<sup>2</sup>

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<sup>1</sup> O.C.G.A. § 50-18-70(b)(2).

<sup>2</sup> American Oversight currently has approximately 16,000 followers on Facebook and 112,200 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Apr. 20, 2023); American

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](mailto:records@americanoversight.org) or 202.539.6507.

Sincerely,

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

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Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Apr. 20, 2023).