



**June 3, 2024**

**SUBMITTED BY EMAIL: [openrecords@gsp.net](mailto:openrecords@gsp.net)**

Georgia Department of Public Safety  
Open Records Unit  
P.O. Box 1456  
Atlanta, GA 30371

**Re: Open Records Request**

Dear Sir/Madam:

Citizens for Responsibility and Ethics in Washington ("CREW") makes this request for records pursuant to the Georgia Open Records Act, [O.C.G.A. § 50-18-70 et seq.](#)

Specifically, CREW requests all records from **January 14, 2019 to the present** concerning the **Georgia Department of Public Safety's response to public gatherings or protests in Georgia.**

This request includes without limitation the following records as they relate to the Georgia Department of Public Safety:

1. All communications with the Office of the Governor of Georgia and the Office of the Attorney General of Georgia that describe policy, tactics, procedures, and equipment to be used by law enforcement officers in response to public gatherings or protests in Georgia.
2. All communications with any federal agency regarding law enforcement response to any public gathering or protest response activities, including without limitation the Department of Justice, the Federal Bureau of Investigation, the Drug Enforcement Administration, the Department of Homeland Security, U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, Federal Protective Services, or the Department of Defense.
3. All records related to any alleged misconduct by, or disciplinary action taken against any employee of the Georgia Department of Public Safety in response to public gatherings or protests.
4. All records of disciplining any employee of the Georgia Department of Public Safety for misconduct related to protest response.
5. All communications related to deploying the National Guard in response to public gatherings or protests.
6. All records of consideration or implementation of new, updated, or revised policies for procedures when responding to incidents and arrests of civilians engaged in public gatherings or protests.

This request excludes news articles and other publicly-available materials without any accompanying discussion by government officials.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, as well as those who were cc'ed or bcc'ed on any emails.

If it is your position any portion of the requested records is exempt from disclosure, please cite each specific exemption you feel justifies the refusal to release the information and notify CREW of the appeal procedures available under the law. CREW requests that you state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential. If some portions of the requested records are properly exempt from disclosure, you are required to redact those portions and produce the remainder of the requested records.

Freedom of expression and the right to peaceful assembly are fundamental rights guaranteed by the federal and state constitutions. Georgia's constitution guarantees freedom of speech, stating that "[n]o law shall be passed to curtail or restrain the freedom of speech or of the press." Georgia Const. Art. I, Sec. I, Para. V. Governor Kemp has also often cast himself as a champion of free speech. For example, in 2022, Governor Kemp signed the Forming Open and Robust University Minds Act, which was ostensibly meant to protect freedom of speech. *See* Forming Open and Robust University Minds Act, H.R. 1, 2021-2022 Regular Session (2022), available at <https://www.legis.ga.gov/legislation/58786>. At signing, Governor Kemp noted "freedom of expression is one of this great nation's fundamental liberties . . . [h]ere in Georgia, we will protect those rights." Press Release, Gov. Kemp Signs Legislation to Protect Freedom of Speech on Public Higher Education Campuses, Office of the Governor (May 3, 2022), available at <https://gov.georgia.gov/press-releases/2022-05-03/gov-kemp-signs-legislation-protect-freedom-speech-public-higher-education>.

CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the public's right to be aware of the activities of government officials, to ensuring the ethical compliance and integrity of those officials, and to highlighting and reducing the influence of money on politics. CREW intends to analyze the information responsive to this request and to share its analysis with the public. The release of information obtained through this request is not in CREW's financial interest.

If there are any fees for searching or copying these records, please inform CREW if the cost will exceed \$100. However, CREW also requests a waiver of all fees because the disclosure of the requested information is in the public interest. The public is entitled to information concerning the Georgia Bureau of Investigation's response to public gatherings and protests. Further, this information is not being sought for commercial purposes. Please advise us if the costs associated with processing this request will exceed \$100.00.

If you have any questions about this request or foresee any problems in fully releasing the requested records, please contact me at [kfarchadi@citizensforethics.org](mailto:kfarchadi@citizensforethics.org), and please copy [foiareturns@citizensforethics.org](mailto:foiareturns@citizensforethics.org) on all communications. Where possible, please produce records in electronic format. Please send the requested records to me in electronic form to [kfarchadi@citizensforethics.org](mailto:kfarchadi@citizensforethics.org) and [foiareturns@citizensforethics.org](mailto:foiareturns@citizensforethics.org). If it's not possible to produce them electronically, please contact me at that email, and I will provide a mailing address. Thank you for your assistance.

Sincerely,



Kayvan Farchadi