

**IN THE OFFICE OF STATE ADMINISTRATIVE HEARINGS
STATE OF GEORGIA**

DAVID ROWAN,	:	DOCKET NUMBER: 2222582
DONALD GUYATT,	:	2222582-OSAH-SECSTATE-CE-57-Beaudrot
ROBERT RASBURY	:	
RUTH DEMETER,	:	Agency Reference No.: 2222582
DANIEL COOPER,	:	
Petitioners,	:	
v.	:	
	:	
MARJORIE TAYLOR GREENE,	:	
	:	
Respondent.	:	

NOTICE TO PRODUCE

Petitioners David Rowan, Donald Guyatt, Robert Rasbury, Ruth Demeter, and Daniel Cooper hereby notify Respondent Marjorie Taylor Greene of her obligation under OSAH Rule 616-1-2.19(2) to produce the documents identified in this notice. All documents should be delivered to counsel for the Petitioners at Post Office Box 5493, Atlanta, Georgia 31107-0493, or by electronic mail to bryan@bryansellslaw.com, within seven days from service (i.e., no later than April 4, 2022).

INSTRUCTIONS

1. In answering the following document requests (collectively, the “requests”), you shall furnish all information that is available to you, including information in the possession, custody, or control of your attorneys, accountants, investigators, experts, representatives, or other agents.
2. If any document responsive to the requests has been lost, destroyed, or is otherwise unavailable, describe and identify each such document by stating in writing: (i) the name(s) of the authors(s), the name(s) of the person(s) who received the original and all

copies and the date and subject matter, (ii) the last known custodian of the document, (iii) the incident, event, or occurrence during which such document was lost, destroyed, or otherwise became unavailable, (iv) each person having knowledge of the circumstances of it being lost, discarded or destroyed, and (v) your efforts to locate each such document.

3. If a claim of privilege is asserted with respect to any document, or you refuse to disclose any document requested herein on any other ground, state the basis for your claim that such document need not be disclosed with such specificity as will permit the Judge to determine the legal sufficiency of your objection or position, and, for each such document, identify:

- a. whether the document contains a request for legal advice and, if so, identify the person who requested the legal advice;
- b. whether the document contains advice as to the meaning or application of particular laws or rules in response to such request;
- c. any further information to explain and support the claim of privilege and to permit the adjudication of the propriety of that claim;
- d. the nature of the privilege (including work product) that is being claimed, and, if the privilege is being asserted in connection with a claim or defense governed by state law, indicate the state's privilege rule being invoked; and
- e. the type of document, *e.g.*, letter or memorandum; the general subject matter of the document; and such other information as is sufficient to identify the document for a subpoena *duces tecum*, including, where appropriate, the author, addressee, and any other recipient of the document, and, where not apparent, the relationship of the author, addressee, and other recipient to each other.

4. If, in answering these requests, you claim any ambiguity in interpreting either the request or a definition instruction applicable thereto, such claim shall not be utilized by you as a basis for refusing to respond; rather, you shall set forth in a part of your response to such a request the language deemed to be ambiguous and the interpretation chosen or used in responding to the request.

5. You shall respond separately and completely to each request, or subdivision thereof, setting forth the question in full followed by each answer.

6. With respect to the documents requested, these requests seek production of all documents described, in their entirety, along with any attachments, drafts and non-identical copies.

7. Questions regarding the interpretation of these requests should be resolved in favor of the broadest possible construction.

8. The documents produced in response to these requests shall be: (i) organized and designated to correspond to the categories in the requests, or (ii) produced in a form that accurately reflects how they are maintained by you in the normal course of business, including, but not limited to the following:

- a. that all associated file labels, file headings and file folders be produced with the responsive documents from each file and that each file be identified as to its owner(s) or custodian(s);
- b. that all pages now stapled or fastened together be produced stapled or fastened together; and
- c. that all documents which cannot legibly be copied be produced in their original form.

9. These requests are to be considered as continuing and you are requested to provide, by way of supplementary responses hereto, such additional information as you or any persons acting on your behalf may hereafter obtain that will augment, clarify, or otherwise modify the responses now given to these requests. Such supplementary responses are to be filed and served upon the undersigned counsel as soon as practicable after receipt of such information or documents.

10. All photographs shall be produced in color.

11. All documents shall be produced in their native format and/or as TIFs and include electronically stored information. You may not convert the data to a form that is more burdensome and/or less searchable. If you convert data to TIFs from native format, you must retain all metadata—including but not limited to the OCR database, document

demarcations, the date of the documents, the author of the documents, the recipients of the documents, the type of documents, etc.—in a usable load file.

DEFINITIONS

In responding to Petitioners' First Notice to Produce, the following definitions shall apply:

1. You: The terms "You" and "Your" refer to Marjorie Taylor Greene whether in her individual capacity, in her capacity as a candidate for the United States Congress, or in her official capacity as a Member of Congress.
2. Your Staff: The term "Your Staff" refers both to Marjorie Taylor Greene's campaign staff and to Marjorie Taylor Greene's Congressional staff.
3. Communication: The term "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).
4. Document: The term "Document" means, without limitation, the following items which are in the possession, custody or control of Respondent Marjorie Taylor Greene, including all of her agents, partners, employees, attorneys, representatives, and/or campaigns, whether printed or recorded or reproduced by any other mechanical or electronic process, or written or produced by hand.
5. Person: The term "person" is defined as any natural person or any business, legal or governmental entity, corporation or association.
6. Concerning: The term "concerning" means relating to, referring to, describing, evidencing, or constituting.
7. All/Each: The terms "all" and "each" shall be construed as all and each.

8. And/Or: The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this discovery request all responses that might otherwise be construed to be outside of its scope.

DOCUMENTS

1. All documents on which You will rely at any hearing held in this matter pursuant to O.C.G.A. § 21-2-5(b) and Chapter 616-1-2 of the Administrative Rules of Procedure.

2. All documents concerning the demonstration at the Ellipse on January 6, 2021, including all documents concerning the planning for the event.

3. All documents concerning the march on the U.S. Capitol on January 6, 2021, including all documents concerning the planning for the event.

4. All documents concerning the demonstration at the U.S. Capitol on January 6, 2021, including all documents concerning the planning for the event.

5. All documents related to statements made by You concerning those who participated in any demonstration on January 6, 2021.

6. All documents or communications sent or received by You between November 1, 2020 and January 31, 2021, in which a reference was made to the term “1776.”

7. Documents sufficient to identify all persons who received a tour, whether formal or informal, and/or who were taken by You or Your Staff to otherwise nonpublic areas of the United States Capitol building, between December 1, 2020 and January 6, 2021.

8. All communications concerning the planning and/or arrangement of tours, whether formal or informal, and/or visits during which visitors were taken by You or Your Staff to otherwise nonpublic areas of the United States Capitol building between December 1, 2020 and January 6, 2021.

9. All communications between You or Your Staff on one hand, and any organizers of the November 14, 2020 “Million MAGA March” in Washington D.C. on the other hand.

10. All communications between You or Your Staff on one hand, and any organizers of the December 6, 2020 demonstration in Des Moines, Iowa in support of Donald Trump on the other hand.

11. All communications between You or Your Staff on one hand, and any organizers of the December 12, 2020 demonstration in Washington, D.C., in support of Donald Trump on the other hand.

12. All communications between You or Your Staff on one hand, and any organizers of protests, demonstrations, or other public gatherings in support of Donald Trump that occurred on January 6, 2021 on the other hand.

13. All documents concerning Your December 21, 2020 meeting with Donald Trump and/or any other White House staff.

14. All documents concerning Your participation in any event organized by Ali Alexander on or around January 6, 2021.

15. All communications between You or Your Staff on one hand, and Ali Alexander on the other hand, between November 1, 2020 and January 31, 2021.

16. All communications between You or Your Staff on one hand, and Enrique Tarrío on the other hand, between November 1, 2020 and January 31, 2021.

17. All communications between You or Your Staff on one hand, and Anthony Agüero on the other hand, between November 1, 2020 and January 31, 2021.

18. All communications between You or Your Staff on one hand, and Nicholas Fuentes on the other hand, between November 1, 2020 and January 31, 2021.

19. All communications between You or Your Staff on one hand, and Patrick Casey on the other hand, between November 1, 2020 and January 31, 2021.

20. All communications between You or Your Staff on one hand, and any member or affiliate of the Proud Boys (including, but not limited to, Ethan Nordean, Joseph Biggs, Zachary Rehl, Charles Donohoe, and Dominic Pezzola) on the other hand, between November 1, 2020 and January 31, 2021, concerning one or more of the following topics: (i) the 2020 presidential election and the results thereof; (ii) any protest, demonstration, or other public gathering in support of Donald Trump; (iii) violence.

21. All communications between You or Your Staff on one hand, and any member or affiliate of Women for America First (including, but not limited to, Amy Kremer, Kylie Kremer, and Cynthia Chafian) on the other hand, between November 1, 2020 and January 31, 2021, concerning one or more of the following topics: (i) the 2020 presidential election and the results thereof; (ii) any protest, demonstration, or other public gathering in support of Donald Trump; (iii) violence.

22. All communications between You or Your Staff on one hand, and any member or affiliate of the America First Foundation on the other hand, between November 1, 2020 and January 31, 2021, concerning one or more of the following topics: (i) the 2020 presidential election and the results thereof; (ii) any protest, demonstration, or other public gathering in support of Donald Trump; (iii) violence.

23. All communications between You or Your Staff on one hand, and any member or affiliate of the Three Percenters (including, but not limited to, Allan Hostetter, Russel Taylor, Erik Scott Warner, Felipe Antonio “Tony” Martinez, Derek Kinnison, and Ronald Mele) on the other hand, between November 1, 2020 and January 31, 2021, concerning one or more of the following topics: (i) the 2020 presidential election and the

results thereof; (ii) any protest, demonstration, or other public gathering in support of Donald Trump; (iii) violence.

24. All communications between You or Your Staff on one hand, and any member or affiliate of the Oath Keepers (including, but not limited to Stewart Rhodes, Edward Vallejo, Thomas Caldwell, Joseph Hackett, Kenneth Harrelson, Joshua James, Kelly Meggs, Roberto Minuta, David Moerschel, Brian Ulrich, Jessica Watkins, James Beeks, Donovan Crawl, William Isaacs, Connie Meggs, Sandra Parker, Bernie Parker, Laura Steele, Mark Grods, and Jonathan Walden) on the other hand, between November 1, 2020 and January 31, 2021, concerning one or more of the following topics: (i) the 2020 presidential election and the results thereof; (ii) any protest, demonstration, or other public gathering in support of Donald Trump; (iii) violence.

This 28th day of March, 2022.

Respectfully submitted,

/s/ Bryan L. Sells

Bryan L. Sells

Georgia Bar No. 635562

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Attorneys for Petitioners

* Motions for pro hac vice admission forthcoming.

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2022, I served the foregoing document on the respondent by electronic mail at the following address: Marjorie@greene2020.com, and by certified mail at the following address: 204 Woodglen Road SW, Rome, GA 30165.

/s/ Bryan L. Sells

Bryan L. Sells

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