

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

STACEY KALBERMAN,

Plaintiff,

vs.

GEORGIA GOVERNMENT
TRANSPARENCY AND
CAMPAIGN FINANCE
COMMISSION, f/k/a GEORGIA
STATE ETHICS COMMISSION,
HOLLY LABERGE, in her Official
capacity as Executive
Secretary of the Georgia
Transparency and Campaign
Finance Commission, and
PATRICK MILLSAPS, in his
Individual capacity,

Defendants

Civil Action No.:
2012CV216247

**DEFENDANT GEORGIA GOVERNMENT TRANSPARENCY AND
CAMPAIGN FINANCE COMMISSION'S RESPONSES TO PLAINTIFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, The Georgia Government Transparency and Campaign Finance Commission, Defendant in the above-styled action, by and through its attorney of record, the Attorney General for the State of Georgia, and serves its Responses and Objections to Plaintiff's First Request for Production of Documents to Defendant as follows.

Response

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled “Documents in response to Plaintiff’s (Sherilyn Streicker) First Request for Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Request No. 2

Please produce the Commission’s entire investigative file concerning Nathan Deal, including all correspondence relating to that investigation into alleged ethical violations committed by his campaign for governor in the 2010 election cycle. Plaintiff acknowledges the sensitive nature of this request and agrees to the production of the responsive documents subject to a privilege log and offers that the document will be viewed by counsel and Plaintiff only.

Response

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled “Documents in response to Plaintiff’s (Sherilyn Streicker) First Request for Production of Documents Produced by: Georgia

Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Request No. 3

Please produce any and all documents relating to the budget of the Commission from 2009 through 2012.

Response

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled “Documents in response to Plaintiff’s (Sherilyn Streicker) First Request for Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Request No. 4

Please produce any and all calculations or proposals prepared to support the financial necessity of cutting Plaintiff’s salary in May to June 2011.

Response

Defendant has no documents to produce based on its interpretation of Plaintiff’s described requested documents.

Request No. 5


Response

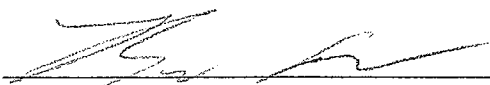
To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled "Documents in response to Plaintiff's (Sherilyn Streicker) First Request for Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission," Plaintiff will produce such documents to Plaintiff.

Respectfully submitted,

SAMUEL S. OLENS 551540
Attorney General

DENNIS R. DUNN 234098
Deputy Attorney General


ANNETTE M. COWART 191199
Senior Assistant Attorney General


BRYAN K. WEBB 743580
Senior Assistant Attorney General

PLEASE SERVE:

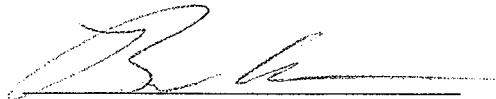
BRYAN K. WEBB
Senior Assistant Attorney General
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
Tele: (404) 656-5331
Fax: (404) 657-9932
Email: bwebb@law.ga.gov

CERTIFICATE OF SERVICE

I hereby certify that on June 14th, 2013, I served the foregoing
**DEFENDANT GEORGIA GOVERNMENT TRANSPARENCY AND
CAMPAIGN FINANCE COMMISSION'S RESPONSES TO PLAINTIFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**, upon opposing
counsel in this case by sending a copy via the United States Mail with adequate
postage affixed and addressed as follows:

Kimberly Worth
Barton Black
JOYCE THRASHER KAISER & LISS, LLC
Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328

This 14th day of June, 2013.



Bryan K. Webb
Counsel for Defendant
State Bar No.: 743580