

SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

SHERRY ELLEN STREICKER,

Plaintiff,

v.

GEORGIA GOVERNMENT
TRANSPARENCY AND
CAMPAIGN FINANCE
COMMISSION,

Defendant.

CIVIL ACTION

FILE NO.: 2612CV216757

JURY TRIAL DEMANDED

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION
OF DOCUMENTS**

Pursuant to O.C.G.A. § 9-11-34, Plaintiff hereby submits the following Requests for Production of Documents. Plaintiff requests that Defendant produce the following documents for inspection and copying at the offices of Plaintiffs' counsel, within the time provided by law.

INTRODUCTION AND DEFINITIONS

1. Each of the following Requests seeks all documents available to Defendant, Defendant's attorneys or agents, and any other person acting on Defendant's behalf. In lieu of producing materials that are in Defendant's custody and control but are not actually in Defendant's possession or in the possession of Defendant's counsel, Defendant may, where appropriate, execute an authorization or authorizations enabling Plaintiff to obtain copies of the materials at their own expense.
2. As used in these Requests, "person" shall mean an individual, firm, partnership, corporation, proprietorship, association or any other organization or entity.

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3. As used in these requests, "Defendant" shall mean Defendant Georgia Government Transparency and Campaign Finance Commission and its predecessor agency, the Georgia Ethics Commission.
4. As used in these Requests, "document" is used in its customary broad sense to mean every writing or record of every type and description that is in the possession, control, or custody of Defendant, including without limitation, the following items, whether printed, taped or recorded, filmed, reproduced by any process, written or produced by hand, and whether an original, master or copy, namely: agreements, communications, including intra-agency communications and correspondence; cablegrams, radiograms, and telegrams; email; notes and memoranda; computer printouts; summaries; minutes and records of telephone conversations, meetings and conferences, including lists of persons attending meetings or conferences; summaries and records of personal conversations or interviews; books, manuals, publications and diaries; charts; financial records and/or summaries of financial records of any kind; photographs; reports and/or summaries of investigations and/or surveys; opinions and reports of consultants; reports and summaries of negotiations; drafts of originals or preliminary notes on, and marginal comments appearing on, any document; other reports and records; any other paper or physical thing containing writing; every copy of such writing or record where the original is not in the possession, custody, or control of the Defendant, and every copy of every such writing or record where such copy contains any commentary or notation whatsoever that does not appear on the original.
5. If any documents identified in these Requests cannot be produced in full, produce them to the extent possible, specifying the reasons for your inability to produce the remainder and

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stating whatever information, knowledge, or belief you have concerning the non-produced portion.

6. If in response to any Request you do not produce any document because of a claim of privilege or work product, please produce a privilege log describing any such documents by stating its date, author, and the name of the present custodian, and describe the substance or content of the document and the basis for the claim of privilege with sufficient detail to permit evaluation of the claim. Produce the document requested to the extent to that it is not subject to the objection or privilege.
7. These Requests are deemed continuing to the extent provided for by law. If, after producing documents, you obtain or become aware of any further documents responsive to these Requests, you are requested to produce those documents.
8. As used in these requests, "concerning" means referring to, reflecting, evidencing, or supporting.
9. As used in these requests, "subject matter of this action" refers to the claims made by Plaintiffs in the Complaint and the underlying facts, as well as the defenses asserted by Defendant Morley and the underlying facts.

DOCUMENT REQUESTS


1. All documents concerning the employment of Sherry Ellen Streicker with Defendant, including:
 - (a) Ms. Streicker's personnel file;
 - (b) A job description for her position of Deputy Executive Secretary;

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- (c) All performance appraisals, reviews, notes, meeting minutes, memoranda, and correspondence between anyone concerning Plaintiff's performance of the duties of her position, and all other documents concerning her job performance;
 - (d) All documents concerning Ms. Streicker's work assignments;
 - (e) All documents concerning the decision to terminate her employment.
- 2. All documents concerning the budget of the Defendant, including all reports, analyses, compilations, spreadsheets, charts, projections, or other documents reflecting the funding of the Defendant and its expenditures, between the fiscal year that includes January 1, 2009 through the present;
- 3. All documents constituting communications between any employees of the Defendant and anyone else concerning the Defendant's budget or fiscal expenditures between January 1, 2009 and the present;
- 4. All documents that the Defendant contends support the Defendant's purported need in June of 2011 to reduce the salary of Stacey Kalberman and terminate the employment of Sherry Ellen Streicker;
- 5. All documents concerning the reduction of Stacey Kalberman's salary and/or the termination of Sherry Ellen Streicker's employment, including notes, meeting minutes, memoranda, and correspondence between anyone concerning the reduction of Stacey Kalberman's salary and/or the termination of Sherry Ellen Streicker's employment;
- 6. All documents concerning the decision by the Defendant to create and fill the position of Staff Attorney that was ultimately filled by Elisabeth Murray-Obertein, including all notes, memoranda, and communications between anyone concerning the need for the position and the ability to fund its salary;

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7. All documents concerning all applicants for the position of Staff Attorney with the Defendant that was ultimately filled by Elisabeth Murray-Obertein, including all applications, all notes or memoranda concerning all applicants, and all communications between anyone concerning all applicants;
8. All documents concerning the Defendant's decision not to interview Sherry Ellen Streicker for the position of Staff Attorney that was ultimately filled by Elisabeth Murray-Obertein, including all notes or memoranda concerning Ms. Streicker's application for the position and all communications between anyone concerning Ms. Streicker's application;
9. All documents concerning the Defendant's decision to hire Elisabeth Murray-Obertein for the position of Staff Attorney, including all notes or memoranda concerning her application, interview(s), or submission of materials in connection with application, and all communications between anyone concerning the same;
10. All documents concerning the violation of any law, rule, or regulation by Georgia Governor Nathan Deal at any time, including all complaints filed with the Defendant, all files concerning the investigation of such complaints, and all documents obtained as part of such investigations.



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Counsel for Plaintiff Sherry Ellen Streicker

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CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2012, a true and correct copy of **PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS** was served on the Defendant by personal service of process in accordance with O.C.G.A. § 50-21-35, including service on:

Commissioner Kevin Abernethy
Commissioner Kent Alexander
Commissioner Dennis T. Cathey

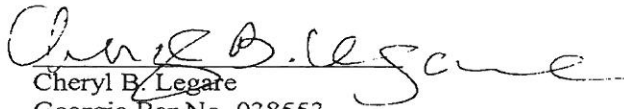
Commissioner Hillary Stringfellow
Commissioner Heath Garrett
Executive Secretary Holly LaBerge

at their regular business address of 200 Piedmont Avenue Southeast, Suite 1416, Atlanta, GA 30334; and

Director Lisa Pratt
Department of Administrative Services
Risk Management Division

at her usual business address of 200 Piedmont Avenue SE, Suite 1804, Atlanta, Georgia 30334.

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