



November 4, 2022

VIA U.S. CERTIFIED MAIL AND ELECTRONIC MAIL

Office of the Attorney General of Georgia
40 Capitol Square, SW
Atlanta, GA 30334
404.458.3600

RE: OFFICIAL NOTICE OF INTENT TO FILE LAWSUIT

To the Office of the Attorney General:

Pursuant to Rule 5.1. of the Federal Rules of Civil Procedure and O.C.G.A. §9-4-7, this letter serves as notice of our intent to sue on behalf of impacted parties in Georgia. We intend to seek both preliminary and permanent injunctions that restrain principals, school districts, and other government officials and entities from enforcing O.C.G.A. §20-1-11.¹ Furthermore, the plaintiffs will ask a court to declare O.C.G.A. §20-1-11 unconstitutional.

This letter serves as notice of your duty to preserve all electronically stored information, copies, and backups as defined by Rule 34 of the Federal Rules of Civil Procedure, along with any physical papers, files, or media related to the enactment and enforcement of O.C.G.A. §20-1-11. The deletion and/or destruction of any of the foregoing—including but not limited to electronic communications, such as emails, memoranda, notes, and the like—is prohibited by law, and the undersigned will seek any and all legal remedies to address any such destruction of evidence.

Sincerely,

SOUTHERN POVERTY LAW CENTER

/s/ Brock Boone

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¹ Commonly referred to by its 2022 bill number HB 1084 and as the “Divisive Concepts Law.”

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