

THE FIRM OF

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October 9, 2018

VIA HAND DELIVERY

John Watson
Chairman
Georgia Republican Party, Inc.
c/o Anne W. Lewis
1170 Peachtree Street NE
Suite 2200
Atlanta, GA 30309-7200

RE: *The Georgia Republican Party's false and defamatory statements
regarding Josh McLaurin*

Dear Mr. Watson:

This firm has been retained by Josh McLaurin to represent him in connection with false and defamatory statements made about him in a recent political mailer, a copy of which is attached hereto ("mailer"). I write today to demand that you and the Georgia Republican Party, Inc. (hereinafter collectively referred to as "you") retract these statements as to Mr. McLaurin.

Specifically, the political mailer falsely states that there are "ongoing criminal investigations" against Mr. McLaurin with regard to alleged violations of O.C.G.A. §§ 21-2-565 and 21-2-561.

These statements are false and defamatory as to Mr. McLaurin. As you are aware, following an unsuccessful residency challenge against Mr. McLaurin, allies of Alex Kaufman and the Georgia Republican Party filed a baseless administrative complaint with the Secretary of State falsely alleging that Mr. McLaurin violated certain code sections. Mr. McLaurin has violated no law and provided a response to the Secretary of State stating as much. There is no ongoing criminal investigation of any kind. Even assuming the Secretary of State would recommend wasting precious government resources on a criminal investigation of this thinly veiled and baseless political attack, the Secretary of State is not a criminal investigative body. Only upon a referral to a district attorney or the Attorney General of Georgia could one even remotely characterize the allegations as triggering a criminal investigation. There has been no criminal referral. Thus, there is no criminal investigation.

John Watson
October 9, 2018
Page | 2

The mailer wrongfully implicates Mr. McLaurin in a crime. Your reckless, politically motivated actions have harmed the reputation of Mr. McLaurin, a respected member of the Georgia Bar and the community at large.

Pursuant to O.C.G.A. § 51-5-11, this letter constitutes written notice to the Georgia Republican Party, Inc. and you that the mailer is false, defamatory, and libelous *per se* and furthermore constitutes defamation by implication with regard to Mr. McLaurin. The gist of the mailer falsely accuses my client of being involved in the commission of a crime.

The statements were negligently published by you with actual knowledge of falsity or with a reckless disregard for truth or falsity. You have published the false and defamatory statements with actual malice.

I hereby demand that the Georgia Republican Party immediately correct and retract the false and defamatory statements by issuing a corrective statement mailed to each recipient of the false and defamatory mailer. Please notify me when the correction and retraction will be published and furnish me with a copy of same.

Finally, you and your affiliated entities, employees, agents, and assigns are hereby directed to preserve any and all evidence related in any way to the mailer. By this letter, you and any and all of your affiliated entities, employees, agents, and assigns are directed not to destroy, conceal, or alter any paper or electronic files, physical evidence, and/or other data generated by it, relating in any way, no matter how remote, to the mailer and/or the circumstances leading to its creation and publication, including, but not limited to (1) all sources of the statements made in the mailer; (2) any and all documents and data referring to, reflecting, or relating to communications between you and any sources about the mailer or any direct-mail program favoring the election of Alex Kaufman in House District 51; (3) any and all documents and data referring to, reflecting, or relating to internal communications regarding the mailer or any direct-mail program favoring the election of Alex Kaufman in House District 51; and (4) any and all documents and data referring to, reflecting, or relating to communications between you and any third party regarding the mailer or any direct-mail program favoring the election of Alex Kaufman in House District 51. I further demand that you preserve any drafts of the mailer.

I understand that many records and files are maintained electronically. However, this letter specifically requests that all paper and hard copy originals be maintained and preserved in their original format. By the same token, electronic documents and the storage media on which they reside contain relevant, discoverable information beyond that which may be found in printed documents. Therefore, even where a paper copy exists and has been preserved, please preserve and maintain all electronically stored documents in their original native format. This preservation demand specifically encompasses any and all electronic documents, including but not limited to, all word-processed files, e-mails, spreadsheets, all databases, and any other electronically stored and/or generated documents or files.

John Watson
October 9, 2018
Page | 3

If you fail to meet the demands of this letter, Mr. McLaurin is prepared to pursue all available legal remedies.

Govern yourself accordingly.



Stacey Godfrey Evans

Enclosure

cc: Josh McLaurin (via e-mail)

JOSH MCLAURIN UNDER INVESTIGATION

Josh McLaurin
Candidate for State House

The McLaurin Files -

ONGOING CRIMINAL INVESTIGATIONS

X False swearing under penalty of perjury in violation of
O.C.G.A. § 21-2-565 - Filed with Secretary of State, May 21, 2018. Investigation pending.

X Illegal access and manipulation of the state of Georgia Online
voter registration system in violation of § O.C.G.A. 21-2-561
- Filed with Secretary of State, May 21, 2018. Investigation pending.

Ongoing state ethics Investigations

X Failure to report thousands of dollars in campaign contributions
- Filed with Ga Government Transparency & Campaign Finance Committee on September 20, 2018

TRUST IS THE ISSUE

Paid for by the Georgia Republican Party, Inc.
P.O. Box 550008
Atlanta, Georgia 30355

Vote for Chuck Eaton for PSC,
Mark Butler Labor Commissioner, and
Alex Kaufman for State House

Non-Profit Org.
EPA Postage
PAID
Georgia
Republican Party

What is Josh McLaurin Hiding from North Fulton Voters?

ONGOING CRIMINAL INVESTIGATIONS



False swearing under penalty
of perjury in violation of
O.C.G.A. § 21-2-565



Illegal access and manipulation of
the State of Georgia Online Voter
registration system in violation of
O.C.G.A. § 21-2-561

ONGOING STATE ETHICS INVESTIGATION



Failure to report thousands of
dollars in campaign contributions