

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NORTHERN DIVISION

COMMON CAUSE OF GEORGIA, :  
As an organization :

Plaintiff, :

Civil Action No.  
1:18-cv-5102-AT

v. :

ROBYN CRITTENDEN, in her :  
Official capacity as Acting Secretary :  
Of State of Georgia, :

Defendant. :

**MOTION OF INVESTIGATIVE REPORTER GREG PALAST  
TO FILE AN AMICUS BRIEF IN SUPPORT OF PLAINTIFF**

Greg Palast (hereafter “Mr. Palast”), by and through counsel, Mirer, Mazzocchi, & Julien PLLC, and attorney G. Brian Spears, moves this Court to allow him to file the attached amicus brief and supporting affidavits and documents in support of the plaintiff in this case.

Mr. Palast brings this motion in order to place before the court affidavits and documents which are not in Plaintiff’s possession, and yet which are probative of Plaintiff’s claims, and moreover support a finding of deprivation of the rights of more than a quarter million Georgia voters.

A respected investigative journalist, Mr. Palast led a team of experts that has produced a list of 340,134 Georgians wrongly removed from the voter rolls by Mr. Kemp's office. Mr. Palast avers that this evidence of malfeasance, along with other information he and members of his team have obtained in monitoring the election, is information that will assist the Court in addressing the fundamental issues regarding Georgia Citizen's deprivation of the fundamental right to vote as a result of malfeasance as noted in Plaintiff's complaint. Mr. Palast is an investigative reporter who has been investigating Georgia voting procedures, and especially potential malfeasance by the Secretaries of State, for many years and he has information which he believes will assist the Court in protecting the rights at issue in Plaintiff's case.

As noted, not only does Mr. Palast have the evidence that the Secretary of State wrongly cancelled the registrations of 340,134 persons who were wrongly presumed to have moved— have not moved, but nonetheless were denied to vote based on this erroneous presumption—he also possesses video statements from voters who attempted to file provisional ballots, and were wrongfully denied these ballots even though they were registered. As this information is not in the possession of the Plaintiff, absent permitting Mr. Palast file this amicus brief with the information the Court does not have the opportunity to consider the breadth of

the malfeasance which took place in this election, and accordingly the breadth of relief that is appropriate

Mr. Palast, along with Helen Butler, the Executive Director of the Georgia Coalition for the Peoples' Agenda, is a plaintiff in a case against Mr. Kemp in the Northern District of Georgia which was filed on October 17, 2018 seeking complete information in response to a document request under the National Voter Registration Act. (Civil Action 1:18-cv-04809 (ELR)). It was in the process of getting the data from the Secretary of State and monitoring the election that Mr. Palast discovered the information which he seeks to bring to this Court's attention as Amicus.

For the reasons stated above and in the attached Memorandum of Law your Amicus requests this motion be granted.

Respectfully submitted,

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