

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

Catherine Corkren,	)	
PLAINTIFF	)	
v.	)	
Joe Carn, Jamelle McKenzie, Tracie Arnold	)	CIVIL COMPLAINT
Roderick Gay, Michael Hicks,	)	_____
Winston Denmark, Kelly Bogner	)	
(in their individual capacities)	)	
DEFENDANTS	)	JURY TRIAL DEMANDED

**COMPLAINT FOR CIVIL PENALTIES FOR VIOLATIONS OF THE
GEORGIA OPEN MEETINGS ACT AND OPEN RECORDS ACT**

COMES NOW, Plaintiff, Catherine Corkren, with a complaint and request for civil penalties against the named individual Defendants for violations of the Georgia Open Meetings Act, O.C.G.A. § 50-14-1 through 6 ("OMA") and Open Records Act, O.C.G.A. § 50-18-71 through 77 ("ORA"). Officials of the City of College Park have held effectively-closed meetings and have failed to provide documents in compliance with the ORA. Each of the allegations are negligent violations of ministerial duties required by statute.

Meetings at issue in this lawsuit are January 9, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings.

1. College Park is an agency subject to meeting and records statutes enumerated in O.C.G.A. § 50.

2. Violation of the Open Meetings Act is legal justification for recall from office.

3. A quorum of College Park voting members is constituted by three councilmembers.

4. A quorum was present for January 9, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings.

5. The sole remedy provided under the OMA and ORA is civil penalties (or criminal fines if prosecuted by the Attorney General as intentional violations).

6. Voting ("official action") is not required for a quorum meeting to be subject to provisions of the OMA. Gatherings a quorum of members with the authority to vote, where topics which pertain to agency business are merely discussed or presented are meetings subject to every provision of the OMA:

"The gathering of a **quorum** of the **members** of the governing body of an agency at which any official business, policy, or **public matter of the agency** is formulated, **presented, discussed, or** voted upon." O.C.G.A. § 50-14-1 (a)(3)(A)(i).

The test for its applicability to the meeting..is two pronged: first, is the meeting one of a "governing body of an agency" or any committee thereof?; and second, is the meeting one at which official business or policy of the agency is to be discussed or at which official action is to be taken?" *Red and Black Publishing Company v. Board of Regents*, 262 Ga. 848, 854, 427 S.E.2d 257 (1993).

7. The legislature intentionally changed the wording from [voting] "member" when describing who must be present to constitute a quorum to "any person" when describing who is liable for civil penalties for violation of the OMA and ORA.

Williams v. DeKalb County, 840 S.E.2d 423 (Ga. 2020) Page 22-25 "...it is significant that O.C.G.A. § § 50-14-6, the section of the Act that imposes

penalties for violations of the Act, “refers to ‘any person’ who violates the requirements of the Act.”

INTRODUCTION:

8. This complaint was filed following a highly-contentious College Park, GA city council meeting which was held in Savannah, GA, June 28, 2026, approximately 270 miles outside of city jurisdiction. The jurisdiction of a municipality is defined in its city charter.

9. The City of College Park does not have statewide jurisdiction.

10. Plaintiff contends that the June 28 meeting was held in a manner which impedes public access, and without an agenda posted at the site of the meeting. Actions taken in meetings which violate the OMA are not binding. O.C.G.A. § 50-14-1(b)(2). The officials who take part in violating meetings are subject to civil penalties. O.C.G.A. § 50-14-6.

11. The city's contract for a Destination Marketing Organization ("DMO") was set to expire June 30, 2026. The city issued Requests for Proposals ("RFP") to obtain bids for a new DMO contract. The city manager recommended a DMO (Destination Must Visit Tourism Alliance Incorporated - "DMV"). Destination Must Visit Tourism Alliance Incorporated

12. The mayor and citizens allege DMV utilized fraud in their RFP. Many of DCP's references were alleged to be fraudulent, in that they claimed to have worked for a list of cities, but when those referenced were checked, DMV's claims of references were allegedly falsified. Citizens allege Destination College Park had been formed merely weeks before the company was awarded this multi-million dollar contract.

13. The council called a meeting June 15 at 11 o'clock at night to approve the DMO.

14. When many citizens showed up for the late-night meeting, and the mayor could not ascertain who had called the meeting, the 11PM meeting was cancelled.

15. Although the June 15, 11 PM meeting had been officially advertised on the city website, a council member claimed it was just "a joke."

16. Subsequently, the council scheduled their DMO approval meeting in Savannah, GA for June 28, 2026.

17. Many College Park citizens endured hardship to show up to that meeting. The June 28 meeting was held on Sunday nearly 270 miles from College Park. The notice of this Sunday meeting was made public late Friday afternoon, June 26. The meeting was broadcast over Zoom.

18. The OMA specifically grants state-wide agencies permission to hold meetings by teleconference (O.C.G.A. § 50-14-1 (f)), and to hold meetings anywhere within the state that the agency has designated as its regular meeting place. The state does not grant those permissions to local county and city governments, such as the City of College Park. Consequently, statutes must be construed to mean that cities are not granted permission to hold meetings outside of jurisdiction or by teleconference. A city is not forbidden from telecasting their meetings, but teleconference is not permitted as the exclusive means of granting access for local governments such as College Park. O.C.G.A. § 36 defines local governments as counties and municipalities.

Because counties and municipal corporations can exercise only such powers as are conferred on them by law, if there is a reasonable doubt of the existence of a particular power, **the doubt is to be resolved in the negative.** *Beazley v. DeKalb County.*, 210 Ga. 41, 43, 77 S.E.2d 740 (1953).

19. City meetings are to be held at the designated regular place of meetings. The designated place of College Park meetings, per their annual schedule of regular meetings, is College Park City Hall.

Likewise, there is no contention that the notice in this case was not "posted. ...at the place of regular meetings." Notice of *where* a meeting will be held is covered

by the requirement that the notice be posted at the place of the regular meeting. **This obviously indicates that a specially called meeting will be held where regular meetings are held**, as was done in this case. *Johnson v. Nicely*, 372 SE 2d 223 - Ga: Supreme Court 1988, at 575

20. Meetings of a local government may only be held outside of jurisdiction under strictly-defined emergency conditions. O.C.G.A. § 38-3-54 is the specific (and only) statute which governs when a meeting of a local agency may be held outside of jurisdiction of an agency.

O.C.G.A. § 38-3-54 and O.C.G.A. § 50-14-1 (b) and (c) must be read in parity. Statutes "*in pari materia*" are construed together.

All statutes are presumed to be enacted by the General Assembly with full knowledge of the existing condition of the law and with reference to it; new statutes are to be construed in connection and in harmony with the existing law, and their meaning and effect will be determined in connection with not only the common law and the Constitution, but also with reference to other statutes and the decisions of the courts. *State v. Davis*, 246 Ga. 761, 272 S.E.2d 721 (1980); *Allison v. Domain*, 158 Ga. App. 542, 281 S.E.2d 299 (1981); *Wigley v. Hambrick*, 193 Ga. App. 903, 389 S.E.2d 763 (1989).

21. The legislature has consistently ruled that these "Sunshine law" statutes are to be construed broadly in the direction of openness for the public, especially public access. Exceptions to the Act are construed narrowly. In other words, where the OMA may be ambiguous regarding holding city meetings outside of jurisdiction, the Act is to be construed broadly in favor of public access. The language of the statutes, as it pertains to exceptions or minimal ministerial requirements, must be construed narrowly.

Kilgore v. R.W. Page Corp., 261 Ga. 410, 411(2), 405 S.E.2d 655 (1991). "(w)e must bear in mind that the Open Meetings Act must be broadly construed to effect its purposes of protecting the public and individuals from closed-door meetings."

To further this purpose, the Act, including its default position that meetings be open, must be construed broadly, and any exceptions to the Act, including those

pertaining to closed meetings, must be narrowly construed. *Id.*; *Kilgore v. R.W. Page Corp.*, 261 Ga. 410, 411(3), 405 S.E. 2d 655, (1991).

The General Assembly passed the Open Meetings Act to ensure that the people's business is conducted in an open and accessible manner. The Act is construed broadly to ensure public access to and input into the deliberative process and to foster confidence in our leaders and the decisions they make. *Claxton Enterprise v. Evans County Bd. of Commissioners*, 249 Ga. App. 870, 549 S.E.2d 830 (2001).

22. The OMA was enacted for the protection of the public's trust.

Red & Black Pub. Co. v. Bd. of Regents, 262 Ga. 854 (427 SE2d 257) (1993)

"[T]he policy of this state is that the public's business must be open, not only to protect against potential abuse, but also to maintain the public's confidence in its officials.

Williams v Dekalb County, 308 Ga. at 265–66, 840 S.E.2d at 434 (2020), page 22. The Open Meetings Act requires all meetings, as that term is defined in the Act, of certain public agencies to be open to the public. O.C.G.A. § § 50-14-1 (b) (1). As we have explained, "the Act was enacted in the public interest to protect the public – both individuals and the public generally – from 'closed door' politics and the potential abuse of individuals and the misuse of power such policies entail." *City of College Park v. Martin*, 304 Ga. 488, 489 (818 SE2d 620) (2018)

Atlanta Journal &c. v. Babush, 257 Ga. 790, 792(3), 364 S.E.2d 560 (1988)

"[T]he Open Meetings Act seeks to eliminate closed meetings which engender in the people a distrust of its officials who are clothed with the power to act in their name."

23. College Park officials were in Savannah, GA in June 2026 to attend the annual Georgia Municipal Association ("GMA") conference, and to receive training during the event. The mayor of College Park, Bianca Motely-Broom, served as President of the Georgia Municipal Association, and had duties to attend GMA meetings at the time the June 28 meeting was scheduled to take place. She did not attend the meeting and is not a defendant.

24. Every city official is required by Georgia law to attend classes regarding the administration and operation of municipal government. Title 36, chapter 45 is called the "Georgia Municipal Training Act." "The purpose of such course shall be to instruct

such individuals in the powers, duties, and responsibilities of their positions of trust." O.C.G.A. 36-45-1. These courses are paid for by the tax payers. O.C.G.A. § 36-45-4 (b).

25. While in Savannah to receive training, officials chose to hold a called meeting at their hotel to conduct College Park official city business. According to sworn affidavits of citizens who attended the meeting, the agenda of the meeting was not posted anywhere on the property. The OMA requires a meeting agenda to be posted at the site of the meeting. Many citizens who wanted to have attended the meeting were unable to do so because of the impediments to access caused by distance to Savannah.

26. Plaintiff, Catherine Corkren is a candidate for State Senate in District 36, which includes College Park. Corkren has no opinion of the matters voted upon in the June 28, 2026 council meeting, and no interest in the outcome of the vote. She does not know any of the Defendants or have any personal grievances against them.

27. About 2 hours before the June 28 meeting, Corkren learned that the meeting was to take place in Savannah. Corkren immediately drove to College Park City Hall to investigate whether or not a notice of the meeting had been posted there, as required by the OMA.

28. City Hall is the regular place of College Park council meetings.

29. When Corkren arrived, a man who identified himself as Gerald Walker, exited City Hall to inquire what Corkren needed. Corkren explained her position about the illegality of the meeting, and asked Mr. Walker to convey her message to the officials and ask them to reconsider having the meeting in Savannah. Walker pointed out the posted notice of the meeting, and stated that it was not his job to communicate my message. Gerald Walker is the Director of Communications for the City of College Park.

30. Following the meeting, Corkren reached out to council members by email to discuss the matter. There was no response. Corkren submitted open records requests ("ORR") to the email address of the city clerk, who is the "custodian" of records for the city, according to city ordinances.

31. Although, the ORA requires a response within 3 business days following a request, there was no response whatsoever for more than a week, until after Corkren reminded the clerk of the request. To date, many of the documents that Corkren requested (simple meeting notices, agendas, minutes) have not been provided.

32. Additional allegations of open meetings act violations include non-compliant meeting minutes, and meetings held outside of jurisdiction for annual "retreats." The city moved their yearly planning meeting to distant resort accommodations at Chateau Elan in Braselton, GA. The minutes and agendas of these meetings seem to be non-existent or scant. The notice does not even state the time of meetings.

33. One of the primary reasons Corkren chose to run for office is her long-standing passion for enforcement of Georgia's Sunshine Laws, and accountability for officials who violate those laws. Effecting case law and statutory changes which improve ease of citizen enforcement of the OMA and ORA is one of Corkren's primary goals, and her reason for taking on this case as a litigant.

Former governor Nathan Deal once said of the Open Meetings Act, "Sunshine is the best disinfectant."

PARTIES:

34. Plaintiff, Catherine Corkren, is a resident of Atlanta, Georgia.

35. Defendants are City of College Park, GA, council members (Joe Carn-Mayor Pro Tem, Jamelle McKenzie, Tracie Arnold, Roderick Gay), and city attorney - Winston Denmark, city clerk - Kelly Bogner, and city manager - Michael Hicks.

Crow v. McCallum, 215 Ga. 692, 693, 113 S.E.2d 203 (1960). The proper party to an OMA or ORA action is the public official, not the government entity itself.

36. Each defendant was a participant in council meetings at issue.

37. Each defendant is an elected or appointed official of the city, with an official role at College Park council meetings, designated by city charter and ordinances.

PLAINTIFF SEEKS AN ORDER ON THE FOLLOWING COUNTS:

COUNT 1: Violation of the Open Records Act.

38. No documents were made available within three days in response to a record request made on June 29, 2026. On July 13, 2026, Bogner emailed notification that additional time was needed to respond to the request for GMA meeting itineraries and invoices. The ORA requires notification within 3 business days of a request if additional time is needed because documents are not available within 3 days, and requires a description of the unavailable records to be supplied at a later date, along with an estimate of the date those documents will be provided.

39. Defendant Kelly Bogner is the city clerk. City ordinances specify that the city clerk is the custodian of records for the city.

O.C.G.A. § 50-18-71 (b)(1)(A) Agencies **shall produce for inspection all records** responsive to a request within a reasonable amount of time **not to exceed three business days** of receipt of a request

Insufficient Notice.

40. Notice of the January 9-11, 2026 meetings only contained the dates and place.

COUNT 2: No notice containing time of the January 9, 2026 council meetings was posted.

COUNT 3: No notice containing time of the January 10, 2026 council meetings was posted.

COUNT 4: No notice containing time of the January 11, 2026 council meetings was posted.

Agenda posting.

41. No agenda exists, or was posted, for the January 9-11, 2026 meetings.

42. Additionally, no agendas were posted at the meeting site January 9-11, 2026 meetings.

43. An agenda is a listing of items to be taken up at a meeting.

44. COUNT 5: No agenda was posted at the site of the June 28, 2026 council meeting.

COUNT 6: No compliant agenda was posted at the site of the January 9, 2026 council meeting.

COUNT 7: No compliant agenda was posted at the site of the January 10, 2026 council meeting.

COUNT 8: No compliant agenda was posted at the site of the January 11, 2026 council meeting.

O.C.G.A. § 50-14-1 (e)(1) Prior to any meeting, the agency or committee holding such meeting shall make available an agenda of all matters expected to come before the agency or committee at such meeting. The **agenda shall be available upon request and shall be posted at the meeting site** as far in advance of the meeting as reasonably possible, but shall not be required to be available more than two weeks prior to the meeting and shall be posted, at a minimum, at some time during the two-week period immediately prior to the meeting.

46. COUNT 9-12 : MEETING ACCESS. January 9-11 and June 28, 2026. Access was not afforded to the public. Access to council meetings was impeded by holding council meetings outside of city jurisdiction, resulting in effectively-closed meetings, according to OMA statutes. Meetings must not only be open, but must also be accessible. The

opposite of "affording" public access is impeding public access. A meeting can be open to the public, yet still violate the OMA if impediments are created to access.

47. There was no handicap access to the June 28 meeting.

O.C.G.A. § 50-14-1 (b)(1) Except as otherwise provided by law, all **meetings shall be open to the public...**

(c) The public at all times shall be afforded access to meetings declared open to the public pursuant to subsection (b) of this Code section.

48. June 28, 2026 and January 9, 10, and 11 meetings were held outside of city jurisdiction.

49. No statutorily-acceptable emergency conditions existed justifying moving meetings outside jurisdiction.

O.C.G.A. § 38-3-54 defines which emergencies allow a municipal corporation to hold meetings outside of their jurisdiction.

Whenever, **due to an emergency or disaster resulting from manmade or natural causes or enemy attack**, it becomes imprudent, inexpedient, or **impossible to conduct the affairs of local government at the regular or usual place or places** thereof, the governing body of each political subdivision, including but not limited to each and every **city, county, and municipality of the state, may meet at any place within or outside the territorial limits of the political subdivision** on the call of the presiding officer or any two members of the governing body and shall proceed to establish and designate by ordinance, resolution, or other manner alternate or substitute sites or places as the emergency temporary location or locations of government where all or any part of the public business may be transacted and conducted during the emergency or disaster situation.

This specific listing of emergency conditions which allow a meeting to be moved outside jurisdiction consequently forbids a construction which would allow other reasons for a meeting to be moved outside of jurisdiction.

Under the “venerable principle of statutory construction *expressio unius est exclusio alterius*: the express mention of one thing implies the exclusion of

another.” *Dep’t of Human Res. v. Hutchinson*, 217 Ga. App. 70, 72, 456 S.E.2d 642 (1995). Relatedly, the maxim *expressum facit cessare tacitum*, means that if some things (of many) are expressly mentioned, the inference is stronger that those omitted are intended to be excluded than if none at all had been mentioned. *Id.*

Dillon's Rule: Georgia operates largely under Dillon's Rule, which dictates that a local government can only exercise powers that are *expressly granted* to it by state law, *implied* from those expressly granted powers, or *essential* to the declared objects and purposes of the municipality.

Meeting Minutes - insufficiency. There are no minutes/no legally sufficient minutes of meetings, which contained no voting. Proposals must be recorded in minutes, and the name of persons making each proposal must be recorded, along with the names of all officials present for the meetings.

January 9, January 10, January 11, 2026, minutes are OMA non-compliant.

A proposal may be made by an official using phrases such as: "I think we should ____", "Going forward, let's ____", "Why don't we ____", "Here's the plan ____, " etc.

50. COUNT 13: Proposal for action were made at the January 9 meeting. No proposals were recorded in the January 9 minutes.

51. COUNT 14: Proposal for action were made at the January 10 meeting. No proposals were recorded in the January 10 minutes.

52. COUNT 15: Proposal for action were made at the January 11 meeting. No proposals were recorded in the January 11 minutes.

O.C.G.A. § 50-14-1 (e)(2)(B) The regular **minutes** of a meeting subject to this chapter shall be promptly recorded and such records shall be open to public inspection **once approved** as official by the agency or its committee, but **in no case later than immediately following its next regular meeting**; provided, however, that nothing contained in this chapter shall prohibit the earlier release of minutes, whether approved by the agency or not. **Such minutes shall, at a minimum, include the names of the members present at the meeting, a**

description of each motion or other proposal made, the identity of the persons making and seconding the motion or other proposal, and a record of all votes.

COUNT 16-20: Meeting Minutes - approval. Meeting minutes were not approved by the "next regular meeting." See statute above.

53. The "next regular meeting" after workshop meetings is the voting meeting which occurs the same night as the workshop meeting.

54. Meetings scheduled at the beginning of the year, according to a schedule, are regular meetings.

55. "Workshop" meetings are regularly scheduled meetings.

56. Monthly voting meetings are regular scheduled meetings.

57. Workshop meetings are adjourned before voting meetings are called to order on the same night.

58. April 20, May 4, May 18, June 1, June 15, 2026 workshop meetings minutes were not approved at the voting meetings following the workshop meetings held the same night.

59. COUNT 16: April 20, 2026 workshop meeting minutes were not approved at the voting meetings following the workshop meeting held the same night.

60. COUNT 17: May 4, 2026 workshop meeting minutes were not approved at the voting meetings following the workshop meeting held the same night.

61. COUNT 18: May 18, 2026 workshop meeting minutes were not approved at the voting meetings following the workshop meeting held the same night.

62. COUNT 19 : June 1, 2026 workshop meeting minutes were not approved at the voting meetings following the workshop meeting held the same night.

63. COUNT 20: June 15, 2026 workshop meeting minutes were not approved at the voting meetings following the workshop meeting held the same night.

Liability:

64. Joe Carn participated in the January 9, January 10, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings.

65. Jamelle McKenzie participated in the January 9, January 10, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings.

66. Roderick Gay participated in the January 9, January 10, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings.

67. Tracie Arnold participated in the January 9, January 10, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings.

68. Michael Hicks participated in the January 9, January 10, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings as city manager.

69. Kelly Bogner was present in the January 9, January 10, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings as city clerk.

70. Winston Denmark participated in the January 9, January 10, January 11, April 20 workshop, May 4 workshop, May 18 workshop, June 1 workshop, June 15 workshop, and June 28, 2026 meetings as city attorney.

As participants in violating meetings, each Defendant is individually responsible for civil penalties codified by statute in O.C.G.A. § 50-14-6. Each Defendant is sued in

their individual capacity. Defendants have acted in bad faith with willful disregard for the law. Defendants are liable to the Plaintiff for payment of civil penalties codified in O.C.G.A. § 50-14-6. The city clerk is liable for civil penalties for failure to comply with the Georgia Open Records Act.

Defendants are not immunized by any form of immunity.

Both criminal fines and civil penalties are authorized by O.C.G.A. § 50-14-6. The award in a civil action to enforce violations of the open meetings act is a penal award, not tort damages. Corkren seeks civil penalties for ministerial violations, alleged as negligent violations. While good faith may be a defense to a criminal OMA violation, there is no defense to a negligent ministerial violation.

The OMA was significantly revised in 2012 via Ga. L. 2012, p. 218, 1/HB397. The 2012 OMA revision codified “negligent” violations of the OMA. After 2012, “technical violations” of the OMA were penalized as negligent violations. HB 397 was passed April 17, **2012 to amend the OMA to include citizen prosecution of negligent violations.**

“In addition to increased fines, the Act promotes transparency by creating a civil penalty as well as a criminal penalty for violating its provisions. The lower burden of proof for civil actions makes legal actions against violators more accessible.”
SEE *Georgia State University Law Review*, 29 Ga. St. U.L. Rev. 139 (2012).

JURISDICTION AND VENUE:

71. The court has jurisdiction over the subject matter of this complaint because it is a civil action brought in superior court pursuant to O.C.G.A. § 50-14-5(a): " The superior courts of this state shall have jurisdiction to enforce compliance with the provisions of this chapter, including the power to grant injunctions or other equitable relief.." and to issue criminal warrants.

72. The superior court judges of Fulton County may impose civil penalties for violations of the relevant statutes. The City of College Park is the agency subject to the open meetings and open records act and the "persons" named in this lawsuit are sued in their individual capacities.

73. Venue is appropriate in Fulton County, GA, Superior Court. The City of College Park is located in Fulton County, GA and the regular place of council meetings is in the City of College Park. City Council defendants live in Fulton County and city employees work in Fulton County.

O.C.G.A. § 15-14-5 (a) **The superior courts of this state shall have jurisdiction** to enforce compliance with the provisions of this chapter, including the power to grant injunctions or other equitable relief. In addition to any **action that may be brought by any person**, firm, corporation, or other entity, the Attorney General shall have authority to bring enforcement actions, either civil or criminal, in his or her discretion as may be appropriate to enforce compliance with this chapter.

74. STANDING: Corkren has standing as a Plaintiff. The OMA and ORA do not require a Plaintiff to be a citizen of a specified jurisdiction. No individual damage to the Plaintiff is necessary for standing. Any "person" is authorized to bring a complaint for civil penalties for violation of the OMA and ORA. See O.C.G.A. § 50-14-5 (a) above.

75. STATUTE OF LIMITATIONS: Allegations of open meetings violations were filed within 90 days of the June 28, 2026 meeting at issue in this lawsuit. This complaint may be supplemented to include additional meeting dates and violations. Workshop meetings on April 20, May 4, May 18, June 1, and June 15, 2026 were held within 90 days of the filing of this lawsuit.

76. April 14, 2026 is 90 days prior to July 13, 2026, the date of filing the complaint.

77. Votes taken in meetings which violate the OMA are not binding.

O.C.G.A. § 50-14-1(b)(2) Any resolution, rule, regulation, ordinance, or other official action of an agency adopted, taken, or made at a meeting which is not open to the public as required by this chapter **shall not be binding**. Any action

contesting a resolution, rule, regulation, ordinance, or other formal action of an agency based on an alleged violation of this provision shall be commenced within 90 days of the date such contested action was taken or, if the meeting was held in a manner not permitted by law, within 90 days from the date the party alleging the violation knew or should have known about the alleged violation so long as such date is not more than six months after the date the contested action was taken.

78. This complaint does not seek to contest "a resolution, rule, regulation, ordinance, or other formal action of an agency" taken at the January 9-11 meetings, therefore, the 90-day/6month statute of limitations is inapplicable to the January meeting claims.

"[a]ny action *contesting* a resolution, rule, regulation, ordinance, or other formal action of an agency based on an alleged violation [of OMA]... the direct object of "contest" is not the OMA violation itself. Thus, based on a plain reading of OMA, the limitation period found in O.C.G.A. § § 50-14-1 (b) (2) **applies only to civil actions that contest a public agency decision.**" *Avery v. Paulding County Airport Authority*, 808 SE 2d 15 - Ga: Court of Appeals (2017) at 23

PRAYER FOR RELIEF:

Plaintiff asks that civil penalties be imposed for the violation of the Open Meetings Act and awarded to the Plaintiff. Plaintiff asks for costs of filing, subpoenas, *etc.* be awarded. If an attorney is hired, Plaintiff asks for attorney fees to be paid by Defendants. O.C.G.A. § 50-14-5 (b), O.C.G.A. § 50-18-73, O.C.G.A. § 9-15-14 (a) and (b).

O.C.G.A. § 9-15-14 (c). In a good faith attempt to establish a new theory of law in Georgia, based on recognized precedential and persuasive authority, Plaintiff seeks to establish that a local government has no authority to hold council meetings outside of its own jurisdiction, absent emergency conditions established by statute.

Williams v. DeKalb County, 840 S.E.2d 423 (Ga. 2020) Page 26; "This provision plainly contemplates that a private person (or firm, corporation, or other entity) can bring an action to enforce the Act to protect the public from closed-door politics. See *City of College Park*, 304 Ga. at 489. It follows that, although only a prosecutor empowered to initiate a criminal prosecution on behalf of the State may seek a criminal penalty under O.C.G.A. § § 50-14-6, **any person**, firm, corporation, other entity, or the Attorney General **may request that the trial court impose a civil penalty.** For these reasons, we conclude that **Williams**

had standing to request that a civil penalty be imposed against the commissioners under O.C.G.A. § 50-14-6 and to receive any penalty paid.”
[Emphasis added].

Plaintiff asks that a \$1,000 penalty be imposed on each Defendant for the first violation in each illegal meeting in which they participated. This would result in a calculation of PARTICIPANTS x NUMBER OF VIOLATIONS PER ILLEGAL MEETING x \$1000. Plaintiff asks that a \$2,500 civil penalty be awarded for each additional violation against each Defendant separately.

OPEN MEETINGS ACT PENALTIES - O.C.G.A. § 50-14-6 Any person knowingly and willfully conducting or participating in a meeting in violation of this chapter shall be guilty of a misdemeanor and upon conviction shall be punished by a fine not to exceed \$1,000.00. Alternatively, a civil penalty may be imposed by the court in any civil action brought pursuant to this chapter against any person who negligently violates the terms of this chapter in an amount not to exceed \$1,000.00 for the first violation. A civil penalty or criminal fine not to exceed \$2,500.00 per violation may be imposed for each additional violation that the violator commits within a 12 month period from the date that the first penalty or fine was imposed. It shall be a defense to any criminal action under this Code section that a person has acted in good faith in his or her actions.

Plaintiff asks that a \$1,000 penalty be imposed on Defendant, Kelly Bogner, for the violation of the ORA.

OPEN RECORDS ACT PENALTIES - O.C.G.A. § 50-18-74 (a) Any person or entity knowingly and willfully violating the provisions of this article by failing or refusing to provide access to records not subject to exemption from this article, by knowingly and willingly failing or refusing to provide access to such records within the time limits set forth in this article, or by knowingly and willingly frustrating or attempting to frustrate the access to records by intentionally making records difficult to obtain or review shall be guilty of a misdemeanor and upon conviction shall be punished by a fine not to exceed \$1,000.00 for the first violation. Alternatively, a civil penalty may be imposed by the court in any civil action brought pursuant to this article against any person who negligently violates the terms of this article in an amount not to exceed \$1,000.00 for the first violation. A civil penalty or criminal fine not to exceed \$2,500.00 per violation may be imposed for each additional violation that the violator commits within a 12 month period from the date the first penalty or fine was imposed. It shall be a defense to any criminal action under this Code section that a person has acted in

good faith in his or her actions. In addition, persons or entities that destroy records for the purpose of preventing their disclosure under this article may be subject to prosecution under Code Section 45-11-1.

Plaintiff asks for an award against each individual defendant. Although the agency subject to the OMA and ORA is the City of College Park, it is the individual city official "participants" who are liable for civil penalties in their individual capacities.

Lue v. Eady, 297 Ga. 321, 331 (3) (b) (773 SE2d 679) (2015). "The Open Meetings Act addresses the obligations of subject agencies, but imposes penalties on "any person" who participates."

Cameron v. Lang, 274Ga. 122, 123(1) (549 SE2d341) (2001) The doctrine of official immunity does not protect an individual's decisions, and leave the actions taken in furtherance of those decisions unprotected. Rather, it "protects individual public agents from personal liability for **discretionary** actions taken within the scope of their official authority, and done without willfulness, malice, or corruption." **Under Georgia law, a public officer or employee may be personally liable only for ministerial acts negligently performed** or acts performed with malice or an intent to injure.

Each count alleges negligent violations of ministerial duties, no statutory immunity shields Defendants. Negligent violations are not required to be proven to be intentional or committed with malice. Good faith is only a defense to a criminal OMA violation. No immunity shields Defendants.

The facts, when compared to Georgia statutes and legal authority, require a ruling in favor of the Plaintiff as a matter of law.

Plaintiff requests post-judgement interest at 12 percent per annum. O.C.G.A. § 7-4-12.

NOTE: Plaintiff is still awaiting a response to open records requests for minutes, agendas, and notices of meetings, and has requested certified copies. If each Defendant participated in each meeting at issue, Plaintiff requests the following civil penalties against each Defendant:

Joe Carn: 19 violations. \$1000 1st violation. \$2,500 each additional violation= **\$46,000.**

Jamelle McKenzie: 19 violations. \$1000 1st violation. \$2,500 each additional violation=
\$46,000.

Roderick Gay: 19 violations. \$1000 1st violation. \$2,500 each additional violation=
\$46,000.

Tracie Arnold: 19 violations. \$1000 1st violation. \$2,500 each additional violation=
\$46,000.

Michael Hicks: 19 violations. \$1000 1st violation. \$2,500 each additional violation=
\$46,000.

Winston Denmark: 19 violations. \$1000 1st violation. \$2,500 each additional violation=
\$46,000.

Kelly Bogner: 1 ORA violation: \$1000. 19 violations. \$1000 1st violation. \$2,500 each
additional violation= **\$47,000.**

City Attorney, Winston Denmark, has obtained authority to accept service on behalf of
each Defendant, and to file waivers of service.

Submitted by:

Date: July 13, 2026

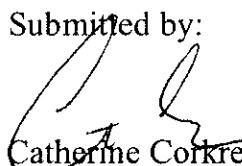

Catherine Corkren, *pro se*
2996 Waters Road, SW
Atlanta, GA 30354
jakieface@gmail.com
(205) 461-3069

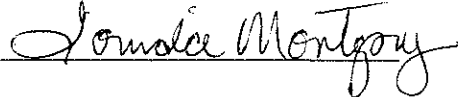
EXHIBIT A
AFFIDAVIT
OF CATHERINE CORKREN

AFFIDAVIT OF CATHERINE CORKREN

1. I am over the age of 18. I am competent to testify to each of the facts in this affidavit from my person experiences. These are my sworn statements.
2. City Attorney, Winston Denmark, has obtained authority to accept service on behalf of each Defendant, and to file waivers of service. The attached email EXHIBIT I is a correct, unaltered copy of the email I received June 7, 2026
3. I emailed an open records request to city clerk, Kelly Bogner at Kelly.bogner@collegeparkga.gov on Monday, June 29, 2026. The attached June 29, 2026 email to Bogner is a correct, unaltered copy of my open records request for certified copies of documents.
4. I did not receive any response at all to my June 29, 2026 open records request within 3 business days following the request.
5. All of the factual statements made in my complaint are true to the best of my knowledge. I am awaiting several city documents I have requested in order to substantiate some facts.


Catherine Corkren
2996 Waters Rd SW
Atlanta, GA 30354
Notarized and sworn before me this day:

July 13, 2026





Lorinda Montgomery
NOTARY PUBLIC
Fulton County, Georgia
My Commission Expires
7/14/2027

**EXHIBIT B- JUNE 30, 2026
ATTORNEY GENERAL LETTER**



GEORGIA DEPARTMENT OF LAW

40 Capitol Square SW
Atlanta, Georgia 30334-1300

CHRISTOPHER M. CARR
ATTORNEY GENERAL

www.law.ga.gov
(404) 458-3600

Writer's Direct Dial:
404-458-4336
ksettlemire@law.ga.gov

June 30, 2026

Via Email Correspondence: wdenmark@dam.law

Winston Denmark, Esquire
Denmark, Ashby & Matricardi, LLC
100 Hartsfield Center Parkway, Suite 400
Atlanta, Georgia 30354

RE: *Open Meetings Act Complaint from Concerned Citizens regarding the
City of College Park*

Dear Mr. Denmark:

I am writing regarding several Open Meetings Act complaints our office received from concerned citizens about the City of College Park ("city"). I have attached each of the complaints for your review. The concerned citizens claim that on June 12, 2026, the city noticed a called meeting for June 15, 2026, at 11:00pm immediately following what appears to be a previously scheduled executive session to consider a new Destination Marketing Organization (DMO) contract. According to the concerned citizens, the meeting was never called to order after no member of the city council would acknowledge having requested the meeting. The concerned citizens state that one councilmember referred to the purported meeting as a "joke" on Facebook.

The concerned citizens also allege that on June 26, 2026, the city posted a notice for another called meeting on the same DMO contract for June 28, 2026, at 4:00 p.m. in Savannah, Georgia. Notably, June 28 was a Sunday and not a business day. According to the concerned citizens, the notice did not indicate that the meeting would be livestreamed or otherwise made available for remote public viewing. Documentation provided to our office reflects the meeting being noticed on social media. One of the concerned citizens informed our office that she drove to Savannah for the meeting and that upon arrival, she observed no notice posted at the meeting location.

Under Georgia law, the Attorney General, as an independent constitutional officer, has the discretionary authority to enforce the Open Records Act and the Open Meetings Act.

Winston Denmark, Esq.
June 30, 2026
Page 2

O.C.G.A. §§ 50-14-5(a) and 50-18-73(a). The Attorney General has chosen to exercise that discretion by establishing a mediation program where citizens may raise issues and concerns with us regarding the Acts, and we will attempt to resolve disputes between citizens and local government. This office also reserves the right to pursue litigation in these matters where it deems doing so is appropriate.

The Open Meetings Act ("Act") expressly provides that "all meetings shall be open to the public" and that "[t]he public at all times shall be afforded access to meetings declared open to the public." O.C.G.A. § 50-14-1(b)(1); O.C.G.A. § 50-14-1(c). The Act provides specific notice requirements "[f]or any meeting, other than a regularly scheduled meeting of the agency for which notice has already been provided[,]" at set forth at O.C.G.A. § 50-14-1(d)(2), which notice provisions would apply to the meetings at issue here.

In both situations at hand, it is unclear whether technical violations of the Act occurred in how the called meetings were noticed. At the very least, however, it does not appear that the city's actions fostered public transparency. As to the June 15 meeting, it is not clear why a meeting would be noticed to take place at 11:00pm, a time outside of regular business hours and when most members of the public would likely be unable to attend. Regarding the meeting of June 28, scheduling a called meeting on a weekend in a location approximately four hours away from the city most certainly does not promote public participation in city government.

Of course, I am not aware of all the circumstances surrounding the alleged meetings, and I am not assuming that the city violated the law. I ask that the city provide a response to the allegations within the next ten business days. Thank you for your attention to this matter.

Sincerely,

/s/ Kristen Settlemire

KRISTEN SETTLEMIRE
Senior Assistant Attorney General

cc: Mr. Brad DeBardelaben (via email correspondence)
Ms. Elizabeth Lester (via email correspondence)
Ms. Julie McGourik (via email correspondence)
Mr. Gregory Chase Rumley (via email correspondence)

EXHIBIT C
JUNE 28, 2026
MINUTES

THE CITY OF COLLEGE PARK
MAYOR AND CITY COUNCIL
JUNE 28, 2026

Location: Boardroom A, Marriott Savannah Riverfront, 100 General McIntosh Boulevard, Savannah, Georgia 31401

ACTION ITEMS

Present: Councilwoman Jamelle McKenzie; Mayor Pro Tem Joe Carn, Councilwoman Tracie Arnold and Councilman Roderick Gay; City Manager Michael Hicks; City Attorney Winston Demark; City Clerk Kelly Bogner

Absent: Mayor Bianca Motley Broom

SPECIAL CALLED MEETING

Mayor Pro Tem Carn called the meeting to order at 4:10 p.m.

1. Roll Call

It was determined a quorum was present.

Councilwoman McKenzie joined the meeting at 4:12 p.m.

2. Approval of Agenda

Councilwoman McKenzie motioned to approve the agenda, seconded by Councilwoman Arnold. (All Voted in Favor)

3. Consideration and Action on DMO Proposals

Councilwoman McKenzie moved to accept the City Manager's recommendation to designate Destination Must Visit Tourism Alliance, Inc. as the City's Destination Marketing Organization (DMO), seconded by Councilwoman Arnold.

McKenzie subsequently amended her motion to provide that the designation of Destination Must Visit Tourism Alliance, Inc. as the DMO is based upon the acceptance and execution of the contractual agreement.

The motion, as amended, was approved. (All Voted in Favor)

4. Board Appointments – Ward 1 and 2 (BIDA and Board of Zoning Appeals)

Councilwoman McKenzie motioned to approve appoint Tonya Wright to the Board of Zoning Appeals, seconded by Councilwoman Arnold. (All Voted in Favor)

There was no action taken on the Ward 1 BIDA appointment.

Councilwoman McKenzie motioned to adjourn the meeting at 4:24 p.m., seconded by Councilwoman Arnold. (All Voted in Favor)



**SPECIAL CALLED MEETING AGENDA
COLLEGE PARK MAYOR & CITY COUNCIL**

Date: June 28, 2026

Time: 4:00 p.m.

**Location: Boardroom A, Marriott Savannah
Riverfront, 100 General McIntosh Blvd
Savannah, GA 31401**

1. Roll Call
2. Approval of Agenda
3. DMO Bids Consideration
4. Board Appointments – Ward 1 and 2 (BIDA and Board of Zoning Appeals)

EXHIBIT D
JUNE 28
&
JANUARY 9-11, 2026
MEETING NOTICES

CITY CLERK'S CERTIFICATE

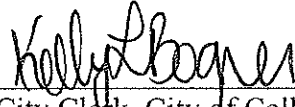
I, **KELLY L. BOGNER**, hereby certify that I am the City Clerk of the City of College Park, Georgia, and that I am the official custodian and keeper of the records of the City of College Park, Georgia. I further certify that the foregoing pages are true and correct copies of the following official records maintained by the City of College Park:

Notice to the Fulton County legal organ for the College Park meetings January 9-11, 2026.

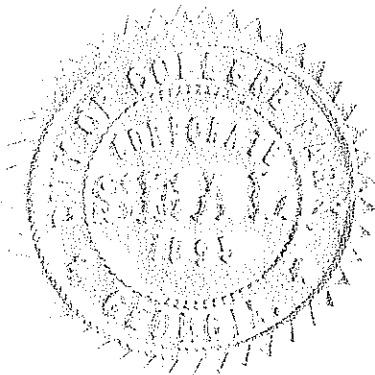
Notice to the Fulton County legal organ for the College Park meeting June 28, 2026.

GIVEN under my hand and the seal of the City, this 7th day of July, 2026.

(SEAL)



City Clerk, City of College Park



Kelly Bogner

From: Kelly Bogner
Sent: Tuesday, January 6, 2026 5:09 PM
To: South Fulton Legals
Cc: Queenie Brown
Subject: College Park Council Retreat Public Notice
Attachments: Public Notice Council Retreat - 01-06-2026.pdf

Good Afternoon,

If possible, please publish this notice in your edition this week. If not, please accept this email as official notice.

Thank you,



Kelly L. Bogner

City Clerk

City of College Park • City Clerk's Department
3667 Main Street, College Park, Georgia 30337
404-767-1537 ext 1010

• kelly.l.bogner@collegaparkga.gov
www.collegaparkga.gov

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PUBLIC NOTICE

COUNCIL RETREAT COLLEGE PARK MAYOR AND CITY COUNCIL JANUARY 9-11, 2026 DATE OF NOTICE: JANUARY 6, 2026

Notice is hereby given that the Mayor and City Council of the City of College Park are scheduled to hold a Council Retreat from Friday, January 9 through Sunday, January 11, 2026, at Château Élan, located at 100 Rue Charlemagne Drive, Braselton, Georgia. The exact time of the retreat is to be determined.

Kelly Bogner

From: Queenie Brown
Sent: Friday, June 26, 2026 12:05 PM
To: Kelly Bogner
Cc: South Fulton Legals; legals@news-daily.com
Subject: City of Colle Park - Legal Notice - Special Called Meeting
Attachments: Public Notice SPC Meeting 06282026.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

Please see the attached Legal Notice for the City of College Park to hold a Special Called Meeting Sunday, June 28th at 4pm Marriott Savannah Riverfront 100 General McIntosh Blvd Savannah, GA, 31401 in Boardroom A

This is not notice and not publication.

Thank you,



PUBLIC NOTICE

SPECIAL CALLED MEETING COLLEGE PARK CITY COUNCIL

A Special Called Meeting of the Mayor and City Council of the City of College Park will be held on Sunday, June 28, 2026, at 4:00 p.m. in Boardroom A located at: Marriott Savannah Riverfront 100 General McIntosh Blvd Savannah, GA, 31401 for the following purpose:

1. Roll Call
2. Approval of Agenda
3. DMO Bids Consideration

EXHIBIT E
JUNE 15 MEETING NOTICE AND
MINUTES
&
JANUARY 9-11, 2026
AGENDA

CITY CLERK'S CERTIFICATE

I, **KELLY L. BOGNER**, hereby certify that I am the City Clerk of the City of College Park, Georgia, and that I am the official custodian and keeper of the records of the City of College Park, Georgia. I further certify that the foregoing pages are true and correct copies of the following official records maintained by the City of College Park:

- June 15, 2026 Called Meeting Agenda and Legal Organ Notice
- January 9, 2026 Council Retreat Agenda
- January 10, 2026 Council Retreat Agenda
- January 11, 2026 Council Retreat Agenda

Minutes for the following meetings:

- January 9, 2026 Council Retreat
- January 10, 2026 Council Retreat
- January 11, 2026 Council Retreat
- April 20, 2026 Workshop Meeting
- May 4, 2026 Workshop Meeting
- May 18, 2026 Workshop Meeting
- June 1, 2026 Workshop Meeting
- April 20, 2026 Regular Voting Meeting
- May 4, 2026 Regular Voting Meeting
- May 18, 2026 Regular Voting Meeting
- June 1, 2026 Regular Voting Meeting

GIVEN under my hand and the seal of the City, this 7th day of July, 2026.

(SEAL)



Kelly L. Bogner

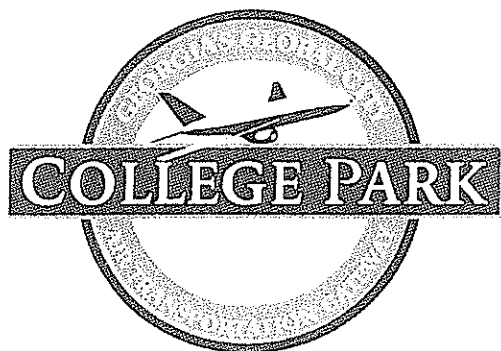
City Clerk, City of College Park

Kelly Bogner

From: Kelly Bogner
Sent: Friday, June 12, 2026 4:56 PM
To: legals@news-daily.com; South Fulton Legals
Subject: Public Notice-SPC Meeting 6/15
Attachments: Public Notice SPC Meeting 06152026.docx

Please see the attached as notice, not publication.

Thank you!



Kelly L. Bogner, CMC

City Clerk

City of College Park • City Clerk's Department
3667 Main Street, College Park, Georgia 30337
404-767-1537 ext 1010

• kelly.bogner@collegeparkga.gov

www.collegeparkga.gov

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PUBLIC NOTICE

SPECIAL CALLED MEETING COLLEGE PARK CITY COUNCIL

Date of Notice: June 12, 2026

A Special Called Meeting of the Mayor and City Council of the City of College Park will be held on Monday, June 15, 2026, immediately following the City Council Executive Session at approximately 11:00 p.m., in the City Council Chambers located at: 3667 Main Street College Park, Georgia for the following purpose:

1. Consideration of and action on a request to approve the most responsive and responsible vendor for Destination Marketing Organization (DMO) services RFP 26-57, to provide tourism marketing, convention sales, visitor promotion, and administration of hotel/motel tax-funded tourism activities for the City of College Park. This will service all Wards.



**SPECIAL CALLED MEETING AGENDA
COLLEGE PARK MAYOR & CITY COUNCIL**

Date: June 15, 2026

**Time: Immediately following the City Council Executive Session
at approximately 11:00 p.m.**

**Location: City Hall, City Council Chambers
3667 Main Street, College Park, Georgia**

1. Call to Order
2. Roll Call
3. Approval of Agenda
4. Consideration of and action on a request to approve the most responsive and responsible vendor for Destination Marketing Organization (DMO) services RFP 26-57, to provide tourism marketing, convention sales, visitor promotion, and administration of hotel/motel tax-funded tourism activities for the City of College Park. This will service all Wards.
5. Adjournment



**COUNCIL RETREAT AGENDA
COLLEGE PARK MAYOR AND CITY COUNCIL
JANUARY 9-11, 2026**

The Mayor and City Council of the City of College Park are scheduled to hold a Council Retreat from **Friday, January 9 through Sunday, January 11, 2026**, at Château Élan, located at 100 Rue Charlemagne Drive, Braselton, Georgia.

The retreat will be held as follows:

- **Friday, January 9, 2026:** 6:00 p.m. until adjournment
- **Saturday, January 10, 2026:** 7:00 a.m. until adjournment (final session begins at 6:00 p.m.; includes Council Appointment to BIDA)
- **Sunday, January 11, 2026:** 7:00 a.m. to 1:00 p.m.

EXHIBIT F
JUNE 29, 2026
OPEN RECORDS REQUEST
AND RESPONSES



K P <jakieface@gmail.com>

Open records request - 2026 GMA DOCUMENTS

3 messages

K P <jakieface@gmail.com>

Mon, Jun 29, 2026 at 8:54 AM

To: kelly.bogner@collegeparkga.gov

Hello: this is an open records request for certified copies of the following documents:

1. Notice of the June 28, 2026 called city council meeting.
2. Agenda for the June 28, 2026 city Council meeting.
3. Copies of itineraries or invoices showing registration for each class (or update, or seminar or the like) each city official was registered to participate in at the 2026 GMA convention.

EXPLANATION: if a city official was scheduled to attend any meeting or seminar, etc. at the GMA 2026 convention, I would like a document that shows which event they were scheduled to participate in.

4. Minutes of all city council meetings which were held be teleconference in 2026.

I would like certified copies of these documents please.

Thank you,

Catherine Corkren

K P <jakieface@gmail.com>

Tue, Jul 7, 2026 at 12:41 PM

To: kelly.bogner@collegeparkga.gov

Please note that the following open records request was submitted last week,

Thank you,
Catherine Corkren

Begin forwarded message:

From: K P <jakieface@gmail.com>

Date: June 29, 2026 at 8:54:37 AM EDT

To: kelly.bogner@collegeparkga.gov

Subject: Open records request - 2026 GMA DOCUMENTS

Hello: this is an open records request for certified copies of the following documents:

[Quoted text hidden]

Kelly Bogner <Kelly.Bogner@collegeparkga.gov>

Tue, Jul 7, 2026 at 12:48 PM

To: K P <jakieface@gmail.com>

Cc: Amanda Corbett <amanda.corbett@collegeparkga.gov>

Received, thank you.



Kelly L. Bogner, CMC

City Clerk

City of College Park • City Clerk's
Department

3667 Main Street, College Park, Georgia
30337

404-767-1537 ext 1010

• kelly.bogner@collegeparkga.gov

www.collegeparkga.gov

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[Quoted text hidden]

Proprietary Statement

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this e-mail in error please notify the City of College Park, GA by emailing it@collegeparkga.com and place Proprietary Statement Response in the subject line. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.



K P <jakieface@gmail.com>

Request #2026-1771

5 messages

Arnetta Daniel (College Park, GA) <CollegeParkGA@request.justfoia.com> Fri, Jul 10, 2026 at 8:18 AM
Reply-To: 4966d5c4-8841-455b-a914-5c38876a41ef.CollegeParkGA@request.justfoia.com
To: jakieface@gmail.com

Thank you for your Open Records Request dated 7/7/2026. We have received your request, and it is currently in the designated departmental queue for review and processing.

As of 7/10/2026, the estimated timeframe for fulfillment is approximately **Three weeks**. At this time, due to a high volume of Open Records Requests, we do not yet have a finalized cost estimate; however, the total is expected to **exceed \$25**.

Should we require any additional information to process your request, we will contact you directly.

Please note that Open Records Requests are processed by the responsible departments **in the order in which they are received**.

If you have any questions or need further assistance, please do not hesitate to contact the **City Clerk's Office** at **(404) 669-3754**. For police-related matters, please contact **(404) 761-3131**.

K P <jakieface@gmail.com> Fri, Jul 10, 2026 at 9:25 AM
To: 4966d5c4-8841-455b-a914-5c38876a41ef.CollegeParkGA@request.justfoia.com, kelly.bogner@collegeparkga.gov

This open request was sent, and received on Tuesday. That means the date due is today, Friday. This is a simple request for readily available documents, which are on your website. I have merely requested certified copies.

One of my requests was made nearly 2 weeks ago. You are in violation of the Georgia open records act.

Is the certification cost in excess of \$25? I agree to pay that. What is your cost for certification?.

Catherine Corkren
Sent from my iPhone

On Jul 10, 2026, at 8:18 AM, Arnetta Daniel (College Park, GA) <CollegeParkGA@request.justfoia.com> wrote:

[Quoted text hidden]

Kelly Bogner (College Park, GA) <CollegeParkGA@request.justfoia.com> Fri, Jul 10, 2026 at 10:18 AM
Reply-To: 4966d5c4-8841-455b-a914-5c38876a41ef.CollegeParkGA@request.justfoia.com
To: jakieface@gmail.com

Ms. Corkren,

As required by State law, you were notified within three business days that additional time would be needed to gather all responsive records. The email you received is our standard notification advising requesters when records cannot be produced within the initial three-business-day period.

Responsive records are currently available have been uploaded to the portal and may be accessed at the following link: College Park, GA Records Requests - Track request

To access the records, please enter your security key **0A7D5906** and request number **2026-1771**.

Any cost estimate provided is an estimate of the anticipated cost to search for, retrieve, review, and produce responsive records, if applicable. There is no separate charge for certification.

Regards,

City Clerk's Office

On Fri, Jul 10, 2026 at 9:27 am, K P wrote:

This open request was sent, and received on Tuesday. That means the date due is today, Friday. This is a simple request for readily available documents, which are on your website. I have merely requested certified copies.

One of my requests was made nearly 2 weeks ago. You are in violation of the Georgia open records act.

Is the certification cost is in excess of \$25? I agree to pay that. What is your cost for certification?.

Catherine Corkren
Sent from my iPhone

On Jul 10, 2026, at 8:18?AM, Arnetta Daniel (College Park, GA) wrote:

?

Thank you for your Open Records Request dated 7/7/2026. We have received your request, and it is currently in the designated departmental queue for review and processing.

As of 7/10/2026, the estimated timeframe for fulfillment is approximately **Three weeks**. At this time, due to a high volume of Open Records Requests, we do not yet have a finalized cost estimate; however, the total is expected to **exceed \$25**.

Should we require any additional information to process your request, we will contact you directly.

Please note that Open Records Requests are processed by the responsible departments **in the order in which they are received**.

If you have any questions or need further assistance, please do not hesitate to contact the **City Clerk's Office at (404) 669-3754**. For police-related matters, please contact **(404) 761-3131**.

corkren <jakieface@gmail.com>

Fri, Jul 10, 2026 at 2:01 PM

To: 4966d5c4-8841-455b-a914-5c38876a41ef.CollegeParkGA@request.justfoia.com

1. This request was submitted June 29, 2026, not June 7. Documents are required within 3 business days of the day the request is submitted to the custodian of records.
2. I requested certified copies. No certified copies have been provided.
3. I requested "Copies of itineraries or invoices showing registration for each class (or update, or seminar or the like) each city official was registered to participate in at the 2026 GMA convention. "None of these very recent documents have been provided.

Catherine Corkren

[Quoted text hidden]

Kelly Bogner (College Park, GA) <CollegeParkGA@request.justfoia.com>

Mon, Jul 13, 2026 at 9:42 AM

Reply-To: 4966d5c4-8841-455b-a914-5c38876a41ef.CollegeParkGA@request.justfoia.com

To: jakieface@gmail.com

Additional time is needed to gather and review the responsive records requested, including copies of itineraries or invoices showing registration for each class, update, seminar, or similar session that each city official was registered to attend at the 2026 GMA Convention.

Records currently available have been uploaded to the portal and may be accessed at the following link: College Park, GA Records Requests - Make a new request

To access the records, please enter your security key **0A7D5906** and request number **2026-1771**.

Regards,

City Clerk's Office

On Fri, Jul 10, 2026 at 2:03 pm, corkren wrote:

1. This request was submitted June 29, 2026, not June 7. Documents are required within 3 business days of the day the request is submitted to the custodian of records.
2. I requested certified copies. No certified copies have been provided.
3. I requested "Copies of itineraries or invoices showing registration for each class (or update, or seminar or the like) each city official was registered to participate in at the 2026 GMA convention. "None of these very recent documents have been provided.

Catherine Corkren

On Fri, Jul 10, 2026 at 10:18?AM Kelly Bogner (College Park, GA) <CollegeParkGA@request.justfoia.com> wrote:

Ms. Corkren,

As required by State law, you were notified within three business days that additional time would be needed to gather all responsive records. The email you received is our standard notification advising requesters when records cannot be produced within the initial three-business-day period.

Responsive records are currently available have been uploaded to the portal and may be accessed at the following link: **College Park, GA Records Requests - Track request**

To access the records, please enter your security key **0A7D5906** and request number **2026-1771**.

Any cost estimate provided is an estimate of the anticipated cost to search for, retrieve, review, and produce responsive records, if applicable. There is no separate charge for certification.

Regards,

City Clerk's Office

On Fri, Jul 10, 2026 at 9:27 am, K P wrote:

This open request was sent, and received on Tuesday. That means the date due is today, Friday. This is a simple request for readily available documents, which are on your website. I have merely requested certified copies.

One of my requests was made nearly 2 weeks ago. You are in violation of the Georgia open records act.

Is the certification cost is in excess of \$25? I agree to pay that. What is your cost for certification?.

Catherine Corkren
Sent from my iPhone

On Jul 10, 2026, at 8:18?AM, Arnetta Daniel (College Park, GA) wrote:

?

Thank you for your Open Records Request dated 7/7/2026. We have received your request, and it is currently in the designated departmental queue for review and processing.

As of 7/10/2026 , the estimated timeframe for fulfillment is approximately **Three weeks**. At this time, due to a high volume of Open Records Requests, we do not yet have a finalized cost estimate; however, the total is expected to **exceed \$25**.

Should we require any additional information to process your request, we will contact you directly.

Please note that Open Records Requests are processed by the responsible departments **in the order in which they are received**.

If you have any questions or need further assistance, please do not hesitate to contact the **City Clerk's Office** at **(404) 669-3754**. For police-related matters, please contact **(404) 761-3131**.

EXHIBIT G

**AFFIDAVITS OF COLLEGE PARK
CITIZENS WHO ATTENDED THE
June 28, 2026 SAVANNAH, GA
COUNCIL MEETING**

AFFIDAVIT OF Jason Killip (NAME)

I, Jason Killip, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I attended the June 28, 2026 College Park city council meeting in Savannah, GA.
2. I regularly attend College Park city council meetings.
3. There was no agenda posted at the site of the council meeting in Savannah, GA.
4. It was very difficult for me to attend the council meeting in Savannah due to the cost of travel, length of trip, and need for hotel accommodations.
5. I spent \$150+ Tax for a hotel room, \$60 on fuel, & 200 in food.
To attend a 15 minute meeting. No announcement of streaming.

6. I emailed my council person @ 3:00pm Friday as of today
not received a response.

I have photo + video evidence of no agenda posted @
the location.

7. I attend all meetings I can and I stream first in turn.
There was no official communication of streaming.

The room for the meeting did not accommodate disability, seating
or fire safety. The room was over occupied for fire code.

Jason C Killip

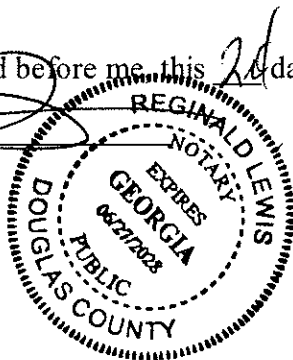
Name (Printed)

[Signature]

Signature

Sworn to and subscribed before me, this 28 day of July, 2026.

Notary Information



AFFIDAVIT OF ALLYSON BLUE

STATE OF GEORGIA

COUNTY OF Fulton

Personally appeared before the undersigned officer, **Allyson Blue**, who, being duly sworn, deposes and states as follows:

1. I am over the age of eighteen, competent to testify, and have personal knowledge of the facts stated herein.
2. I am a resident and citizen of the City of College Park, Georgia.
3. On **Sunday, June 28, 2026**, I traveled from College Park, Georgia, to Savannah, Georgia, to attend the City of College Park Special Called Meeting as a concerned citizen.
4. Upon arriving at the meeting, I observed that there was **no meeting agenda posted or otherwise available for public review**.
5. I further observed that **no seating was available for members of the public**, including myself, requiring attendees to stand during the meeting.
6. I incurred the time and expense of traveling approximately four hours each way in order to exercise my right to observe the actions of my local government.
7. I make this affidavit based upon my personal observations in support of the legal challenge concerning the June 28, 2026, Special Called Meeting. The statements contained herein are true and correct to the best of my knowledge.

Further Affiant sayeth not.

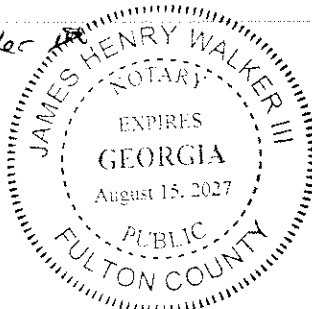
This 2 day of July 2026.

Allyson Blue, Affiant

Sworn to and subscribed before me this 2 day of July 2026.

Notary Public

My Commission Expires: Aug 15, 2027



My sworn statement (Julie McGouirk) of the events of the Special Called City Council Meeting on June 28, 2026, in Savannah.

1. I am over the age of 18. I am competent to attest to the following facts from my own personal experience. These are my sworn statements.
2. I attended the College Park city council meeting on June 28, 2019.
3. No agenda was posted inside or outside of the meeting location.
4. City Manager, Michale Hick came out of the meeting room before the meeting started and informed us that there was not enough room for us inside the meeting room and that he would keep the double doors open and we could stand outside in the hallway and listen. He then went back in the meeting room and closed the doors.
5. City Manager Michael Hicks came back again and when a couple of seniors asked him if seating would be provided for them due to, they could not stand for very long. He told them that they would not be able to accommodate them.
6. Councilman Joe Carn, Councilman Rodrick Gay and Councilwoman Tracy Arnold were in the meeting room with the door closed for at least 20 minutes before the anyone would let us in. Three council people constitutes a quorum in the City of College Park.
7. Once we were in the room we were instructed not to stand behind Councilwoman Jamelle McKenzie and Councilwoman Tracy Arnold and this caused us to be even more crowded in the room.
8. Although I regularly attend council meetings held at College Park City Hall, attending the meeting in Savannah, GA was extraordinarily difficult due to travel expenses, time and distance. I could not afford a hotel room so I made the 7/8 hour round trip in the same day.

Julie McGouirk

Name (PRINTED)

Julie McGouirk

Signature

Sworn to and subscribed before me this 2nd day of July, 2026

Notary Information:

James H. Walker III



AFFIDAVIT OF Marla Bond (NAME)

I, Marla Bond a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. ~~I attended~~ did not attend the June 28, 2026 College Park city council meeting in Savannah, GA.
2. I regularly attend College Park city council meetings.
3. There was no agenda posted at the site of the council meeting in Savannah, GA.
4. It was very difficult for me to attend the council meeting in Savannah due to the cost of travel, length of trip, and need for hotel accommodations. (OR: I did not attend the meeting because of _____).
5. _____ (Additional facts—objectionable things which happened before, during, or after the meeting.)

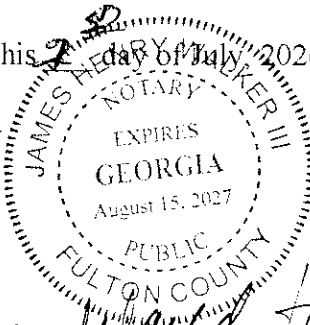
Marla Bond mf

Name

Sworn to and subscribed before me, this 28 day of July, 2026.

Notary Information

James H. Walker



5. The meeting was delayed for quite a while -
 The room was very crowded and no
 seating was available for the citizens
 I don't recall seeing an agenda posted
 outside the meeting room or inside -
 This meeting seemed to have taken place
 without the level of public disclosure typically
 expected.

mf Marla Bond

AFFIDAVIT OF JOSEPH COUSELY (NAME)

I, Joseph Cousey, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I attended the June 28, 2026 College Park city council meeting in Savannah, GA.
2. I regularly attend College Park city council meetings. *-I watch every council meeting*
3. There was no agenda posted at the site of the council meeting in Savannah, GA.
4. It was very difficult for me to attend the council meeting in Savannah due to the cost of travel, length of trip, and need for hotel accommodations.

5. _____

6. _____

7. _____

Joseph H Cousey

Name (Printed)

Joseph H Cousey

Signature

Sworn to and subscribed before me, this 2nd day of July, 2026.

James H. Walker III
Notary Information

My comm. expires: Aug. 15, 2027



AFFIDAVIT OF Johanna B Derda (NAME)

I, Johanna B Derda a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I attended the June 28, 2026 College Park city council meeting in Savannah, GA.
2. I regularly attend College Park city council meetings. mostly online
3. There was no agenda posted at the site of the council meeting in Savannah, GA.
4. It was very difficult for me to attend the council meeting in Savannah due to the cost of travel, length of trip, and need for hotel accommodations.

5. _____

6. _____

7. _____

Johanna B Derda

Name (Printed)

Johanna B Derda

Signature

Sworn to and subscribed before me, this 2nd day of July, 2026

Notary Information

James H. Walker III

my comm. expires Aug. 15, 2027

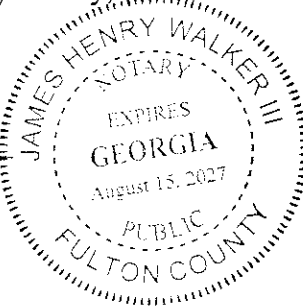


EXHIBIT H

AFFIDAVITS OF COLLEGE PARK
CITIZENS WHO COULD NOT
ATTEND THE June 28, 2026
SAVANNAH, GA
COUNCIL MEETING DUE TO
IMPEDED ACCESS

I am over the age of 18, and I am competent to attest to the following facts from my own personal experience. This is my sworn statement.

Although I regularly attend or watch online city council meetings held at College Park City Hall. Due to the hardships of travel to and from Savannah and the hotel, I was not able to attend. Nor was there a way to give public comment. This is an injustice preventing the citizens from participating in their governance. Citizens should always be able to participate in their governance.

Keith Thieme
1760 Vesta Ave.
College Park GA 30337
678-707-3148
Keiththieme@aol.com

Keith D Thieme


James Henry Walker III

my comm exp Aug. 15, 2027



AFFIDAVIT OF Sherry Coulter (NAME)

I, Sherry Coulter, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I did not attend the June 28, 2026 College Park city council meeting in Savannah, GA. I would like to have attended the meeting, but was not able to because:

The distance and the way for us to drive 4 hours there and back and return soon enough to be back for my mom. I am her only driver and live near by.

2. We could not justify cost for hotel room overnight, it meeting had lasted longer than 1 hour.

3. I usually attend meetings at City Hall and this one was further away on 1 week short notice.

Sherry Coulter

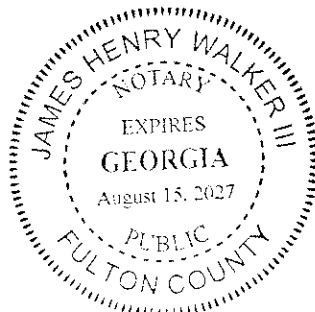
Name (Printed)

Signature

Sworn to and subscribed before me, this 2 day of July, 2026.

Notary Information

James H. Walker III



I am over 18 and competent to attest to the following facts based on my personal experience. This is my sworn statement. While I attend council meetings at College Park City Hall, I couldn't attend the meeting in Savannah, GA, due to travel costs, time constraints, distance, and hotel expenses. This is a great example of preventing citizens from exercising their right to express support for or opposition to ordinances, budgets, and community changes at council meetings.

Warmest Regards,

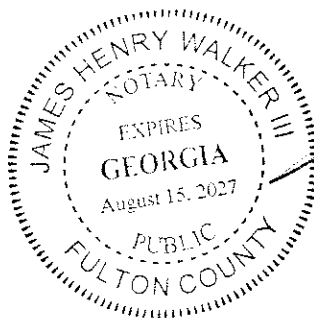
Linda Tramel

Lin2035@msn.com

1792 Vesta Ave, College Park, GA 30337

404-563-427

 7/2/2026





Notary
James H. Walker III
My comm. expires Aug. 15, 2027

AFFIDAVIT OF DARIUS TAYLOR (NAME)

I, DARIUS TAYLOR, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I did not attend the June 28, 2026 College Park city council meeting in Savannah, GA. I would like to have attended the meeting, but was not able to because:

It was too far and I had prior commitments
Given the short notice attendance was not
possible

2. _____

3. _____

DARIUS TAYLOR

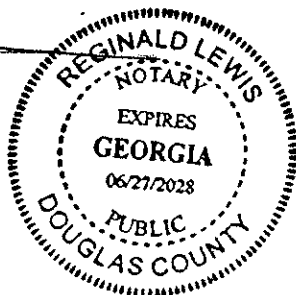
Name (Printed)

D. Taylor

Signature

Sworn to and subscribed before me, this 24 day of July, 2026.

[Signature]
Notary Information



AFFIDAVIT OF Gerald Rocha (NAME)

I, Gerald Rocha, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

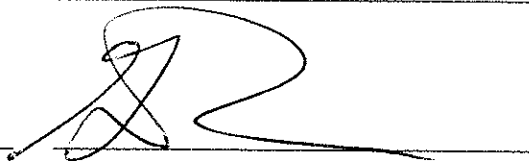
1. I did not attend the June 28, 2026 College Park city council meeting in Savannah, GA. I would like to have attended the meeting, but was not able to because:

I had commitment in College Park and could
not attend this meeting. There was no
official College Park Digital Stream

2. _____

3. _____

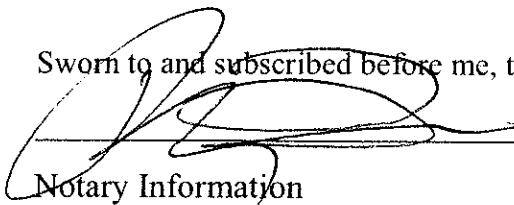
Gerald Rocha



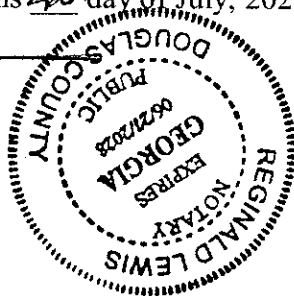
Name (Printed)

Signature

Sworn to and subscribed before me, this 2nd day of July, 2026.



Notary Information



AFFIDAVIT OF CHARLES REGISTAR (NAME)

I, CHARLES REGISTAR, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I attended/~~did not~~ attend the June 28, 2026 College Park city council meeting in Savannah, GA.
2. I regularly attend College Park city council meetings.
3. There was no agenda posted at the site of the council meeting in Savannah, GA.
4. It was very difficult for me to attend the council meeting in Savannah due to the cost of travel, length of trip, and need for hotel accommodations. (OR: I did not attend the meeting because of _____).
5. _____ (Additional facts—objectionable things which happened before, during, or after the meeting.)

Charles P. Registar

Name

Sworn to and subscribed before me, this 2nd day of July, 2026.

Notary Information



AFFIDAVIT OF ROBERT WOLFE (NAME)

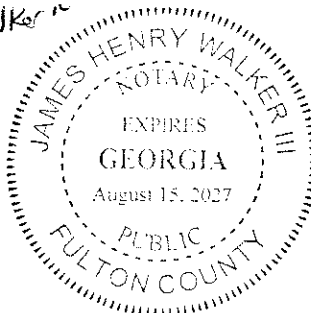
I, ROBERT WOLFE a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I attended did not attend the June 28, 2026 College Park city council meeting in Savannah, GA.
2. I regularly attend College Park city council meetings.
3. ~~There was no agenda posted at the site of the council meeting in Savannah, GA.~~
4. It was very difficult for me to attend the council meeting in Savannah due to the cost of travel, length of trip, and need for hotel accommodations. (OR: I did not attend the meeting because of _____).
5. _____ (Additional facts—objectionable things which happened before, during, or after the meeting.)

[Signature]
Name

Sworn to and subscribed before me, this 2nd day of July, 2026.

Notary Information James H. Walker



AFFIDAVIT OF ANDREW HANNON (NAME)

I, ANDREW HANNON a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I did not attend the June 28, 2026 College Park city council meeting in Savannah, GA. I would like to have attended the meeting, but was not able to because:

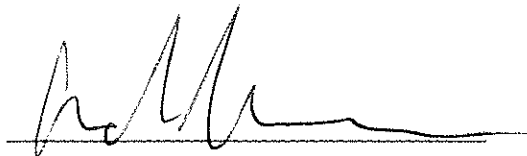
THE DISTANCE REQUIRED TO TRAVEL AND FAMILY
COMMITMENTS KEPT ME FROM BEING ABLE TO
ATTEND.

2. _____

3. _____

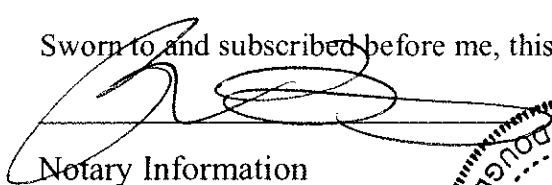
ANDREW HANNON

Name (Printed)

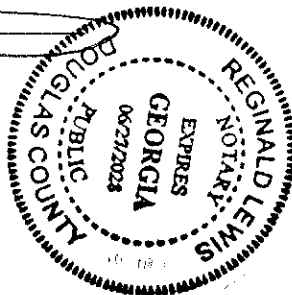


Signature

Sworn to and subscribed before me, this 2nd day of July, 2026.



Notary Information



AFFIDAVIT OF Robert Ellis (NAME)

I, ROBERT ELLIS, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I did not attend the June 28, 2026 College Park city council meeting in Savannah, GA. I would like to have attended the meeting, but was not able to because:
the meeting is too far away for me to attend

2. I am deeply concerned about the lack of transparency regarding selecting a DMO. Many of my friends are in the hospitality industry and I hope they do not lose their jobs

3. _____

ROBERT ELLIS

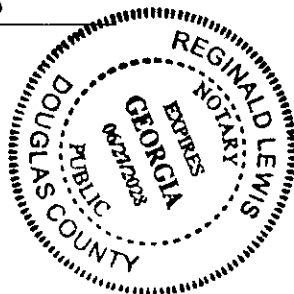
Name (Printed)

Robert Ellis

Signature

Sworn to and subscribed before me, this 2nd day of July, 2026.

[Signature]
Notary Information



AFFIDAVIT OF Harlet Autumn (NAME)

I, Harlet Autumn, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I attended the June 28, 2026 College Park city council meeting in Savannah, GA.
2. I regularly attend College Park city council meetings.
3. There was no agenda posted at the site of the council meeting in Savannah, GA.
4. It was very difficult for me to attend the council meeting in Savannah due to the cost of travel, length of trip, and need for hotel accommodations.
5. It was physically challenging for me to attend because of the amount of time sitting in the car. However, I attend despite the challenge.

6. _____
7. _____

Harlet Autumn

Name (Printed)

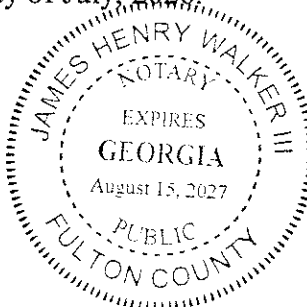
Harlet Autumn

Signature

Sworn to and subscribed before me, this 27th day of July, 2026.

Notary Information

James H. Walker



AFFIDAVIT OF RANDY GODFREY (NAME)

I, RANDY GODFREY, a resident of College Park, GA, at least eighteen (18) years of age, and having personal knowledge of the following facts do hereby swear and certify under oath. These are my sworn statements.

1. I did not attend the June 28, 2026 College Park city council meeting in Savannah, GA. I would like to have attended the meeting, but was not able to because:

I WAS RECOVERING FROM HIP SURGERY AND FIND IT
DIFFICULT TO SIT IN CARS FOR LONG PERIODS OF TIME.

2. _____

3. _____

RANDY GODFREY

Name (Printed)

[Signature]

Signature

Sworn to and subscribed before me, this 2ND day of July, 2026.

Notary Information

James H. Walker III
my comm expires: Aug 15, 2027

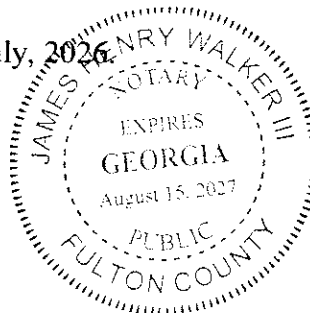


EXHIBIT I

Email from the law firm of
Winston Denmark

College Park Open Meetings Act Litigation

2 messages

T. Orlando Pearson <tpearson@dam.law>

Tue, Jul 7, 2026 at 12:11 PM

To: "jakieface@gmail.com" <jakieface@gmail.com>

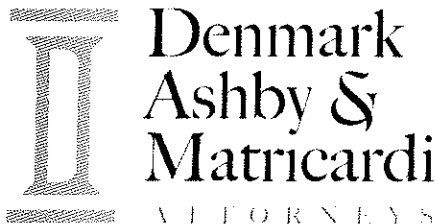
Cc: Winston Denmark <wdenmark@dam.law>, Michael Huening <mhuening@dam.law>, Len Phe <cphe@dam.law>, Gio Pinzon <gpinzon@dam.law>, Vicki Burton <vburton@dam.law>, Paquita Gunter <pgunter@dam.law>, Kennedy Gunter <kgunter@dam.law>

Ms. Corkren,

Hope you are doing well.

Thank you for inquiring concerning service in your potential matter. In this regard, Mr. Denmark has been authorized to accept service. Once you file the complaint, if you would please provide me with a copy and I can prepare an acceptance for your review and consideration.

In the meantime, if you would like to further discuss service, please let me know. Thank you for your time and consideration. Have a great day!

T. Orlando Pearson, Of Counsel*Where Local Governments Turn for Legal Insight***Office:** 770.478.9950 | **Direct:** 770.692.2024 ext. 120

100 Hartsfield Centre Pkwy, Suite 400, Atlanta, Georgia 30354

Connect With Us:[Website](#) | [Facebook](#) | [X \(Twitter\)](#) | [LinkedIn](#)

Confidentiality Notice: This e-mail, including attachments, contains information from the law firm of Denmark Ashby Matricardi and is intended solely for the use of the named recipient(s). This communication, including attachments, may contain information that is confidential and protected by the attorney/client and/or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments, without reading or saving it in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege. In the absence of an executed fee agreement or engagement letter, there is no attorney-client relationship created by this communication. If you have received this e-mail in error, please immediately notify the sender of the e-mail or call (770) 478-9950.

I
K P <jakieface@gmail.com>
To: "T. Orlando Pearson" <tpearson@dam.law>

Tue, Jul 7, 2026 at 12:38 PM

Thank you. I will email you a pdf of the summons and complaint once filed.

Catherine Corkren

Sent from my iPhone

On Jul 7, 2026, at 12:11 PM, T. Orlando Pearson <tpearson@dam.law> wrote:

Ms. Corkren,

Hope you are doing well.

Thank you for inquiring concerning service in your potential matter. In this regard, Mr. Denmark has been authorized to accept service. Once you file the complaint, if you would please provide me with a copy and I can prepare an acceptance for your review and consideration.

In the meantime, if you would like to further discuss service, please let me know. Thank you for your time and consideration. Have a great day!

T. Orlando Pearson, Of Counsel
Where Local Governments Turn for Legal Insight
<image.png>

<image.png>

<image.png>

Office: 770.478.9950 | **Direct:** 770.692.2024 ext. 120
100 Harrisfield Centre Pkwy, Suite 400, Atlanta, Georgia 30354
<image.png>

[Quoted text hidden]