

JAMES BOPP, JR.  
jboppjr@aol.com

---

**THE BOPP LAW FIRM, PC**  
ATTORNEYS AT LAW

MELENA S. SIEBERT  
msiebert@bopplaw.com

THE NATIONAL BUILDING  
1 South Sixth Street  
TERRE HAUTE, INDIANA 47807-3510  
Telephone 812/232-2434 Facsimile 812/235-3685  
[www.bopplaw.com](http://www.bopplaw.com)

---

October 22, 2021

Gov. Brian Kemp  
State Capitol  
206 Washington St., Ste. 203  
Atlanta, GA 30334

Re: Letter to True the Vote, Inc.

Dear Governor Kemp:

This firm represents True the Vote, Inc. We are writing to respond to the letter referenced above from D. Victor Reynolds, the Director of the Georgia Bureau of Investigation. This letter was subsequently released to the media. We write to you to make you aware of the serious consequences that will result from this irresponsible and dangerous leak of confidential information.

First, this letter contains information that was provided confidentially to the Federal Bureau of Investigation. It should never have been taken from the FBI files and publicly released. Our client knows that the information in the letter came from sources at the FBI because it specifically discloses information from confidential source files. This action will have reverberations that reach far beyond Georgia and far beyond the matter referenced in Director Reynolds' letter.

Second, the letter mischaracterizes and selectively omits the evidence that True the Vote provided in a confidential meeting attended by representatives of your office, and representatives of the GBI, including the author of the letter in question, GBI Director D. Victor Reynolds. The letter appears designed to minimize activities that Georgia law enforcement officials failed to detect.

Third, the letter acknowledges that True the Vote's preliminary data analysis, as presented to your office in April of 2021, provided evidence that 279 cellphones had made "multiple trips to within 100 feet of a voter drop box" during the 2020 General Election and U.S. Senate Runoff Election periods. Despite characterizing this data as "curious," GBI Director Reynolds claimed such evidence could not "rise to the level of probable cause."

Fourth, this preliminary data, first provided to the FBI in March, has been augmented by True the Vote's further data analysis, voter drop box surveillance video, chain of custody documents, and other critical, corroborating evidence. Notably, Director Reynolds refused to meet with representatives of True the Vote after April of 2021 so that he could supplement the preliminary

Gov. Brian Kemp  
October 22, 2021  
Page 2

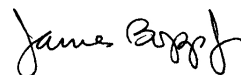
data he found so “curious.”

What is actually curious is Director Reynolds’ legal analysis on probable cause, as similar information has been found to provide probable cause leading to indictments related to election crimes in other states. Curiouser still, is Director Reynolds’ repeated communications to True the Vote’s representatives stating that he had no jurisdiction to investigate or address these potential election crimes, even if given what he deemed sufficient probable cause.

As you know, True the Vote has refrained from revealing the names of individuals who gave information, in part because of the highly sensitive nature of their disclosures and the physical danger to those individuals if exposed. True the Vote was concerned that despite your office’s and the GBI’s promises of confidentiality, that the identities of those involved would be leaked. These concerns have been confirmed by the leak of the GBI letter to the media.

In light of the serious nature of the leak and the likelihood of litigation arising from Director Reynolds’ letter, we request that your office, the GBI, and any other recipient copied on this letter preserve all correspondence, whether verbal and written, related to this matter. Those records would include, but are not limited to, emails, texts, letters, call logs, meeting logs, other written, audio, or digital communications, with all metadata intact. This preservation should include all of the aforementioned records, since April 1, 2021, that contain the words, “True the Vote,” “TTV,” “GOP,” “OpSec,” “Gregg Phillips,” “Catherine Engelbrecht,” “David Shafer,” “Joe Jensen,” “GBI,” or “FBI.”

Sincerely,



CC: Mr. D. Victor Reynolds, Director,  
Georgia Bureau of Investigation;

Mr. David Shafer, Chairman  
Georgia Republican Party

Supervisory Special Agent Joe Jensen,  
Federal Bureau of Investigation, Atlanta  
Field Office

Mr. Brad Raffensperger, Georgia Secretary  
of State

Atlanta Journal-Constitution

THE BOPP LAW FIRM, PC  
James Bopp, Jr.  
Melena S. Siebert