

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

CHRIS CARR and CARR FOR  
GEORGIA, INC.,

*Plaintiffs,*

v.

WBJ LEADERSHIP COMMITTEE, INC.;  
W. BURT JONES in his personal and  
official capacity as Lt. Governor of the  
State of Georgia; BURT JONES FOR  
GEORGIA, INC.,

*Defendants.*

Civil Action No. \_\_\_\_\_

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

Plaintiffs Chris Carr, in his personal capacity, and his authorized campaign committee, Carr for Georgia, Inc. (collectively, Plaintiffs), respectfully seek emergency declaratory and injunctive relief as follows:

**INTRODUCTION**

1. The U.S. Supreme Court has “never upheld the constitutionality of a law that imposes different contribution limits for candidates who are competing against each other.” *Davis v. FEC*, 554 U.S. 724, 738 (2008).

2. In 2022, this Court applied this principle and protected First Amendment rights to prevent the use of leadership committees in a primary

election for Governor when one candidate had access to a leadership committee and the other did not. *Perdue v. Kemp*, 584 F. Supp. 3d 1310, 1323 (N.D. Ga. 2022).

3. Later that same year, this Court prevented a leadership committee from raising funds until after the chair became the nominee of a political party, when another candidate lacked access to a leadership committee. *One Georgia, Inc. v. Carr*, 601 F. Supp. 3d 1291, 1309 (N.D. Ga. 2022).

4. Despite full knowledge of this history, Mr. Jones and his leadership committee, WBJ Leadership Committee, Inc., are ignoring this Court's prior rulings and using a leadership committee—that has no contribution or coordinated spending limits—in a primary election against a candidate without one, meaning that “different contribution limits” apply to “candidates who are competing against each other.” *Davis*, 554 U.S. at 738.

5. This Court cannot permit this violation of the U.S. Constitution to continue.

6. Georgia law authorizes certain state officeholders and caucuses to maintain leadership committees for a variety of purposes. But in a primary election, when one candidate chairs a leadership committee and the other candidate does not and cannot, the candidate who chairs a leadership committee is given special benefits, including a different contribution limit in the same election against other candidates, the ability to fully coordinate with an entity

separate from his campaign committee, and the ability to raise funds during the legislative session.

7. As a result, Mr. Jones has *de facto* access to a second campaign committee in the primary election that significantly disadvantages Mr. Carr or any other candidate who may run for Governor. As discussed below, Mr. Jones announced his campaign for Governor and has continued to (1) fundraise for his leadership committee, (2) promote his leadership committee as part of his gubernatorial campaign, and (3) spend funds from his leadership committee as part of his campaign in the primary election.

8. Mr. Jones is raising and spending unlimited amounts of money in the primary – and Mr. Carr is limited in what he can raise by Georgia’s existing campaign contribution limits. This Court should level this uneven playing field by preventing Mr. Jones from using his leadership committee during the primary election.

## **PARTIES**

9. Plaintiff Chris Carr, in his personal capacity, is the current Attorney General of the State of Georgia and announced his candidacy for Governor on November 21, 2024.

10. Plaintiff Carr for Georgia, Inc., is Mr. Carr's campaign committee for Governor, as defined by Georgia law, O.C.G.A. § 21-5-3(2), and is headquartered in Atlanta, Georgia.

11. Defendant WBJ Leadership Committee, Inc., is a leadership committee, as defined by Georgia law, O.C.G.A. § 21-5-34.2(a), and, to be an authorized leadership committee, must be chaired by Mr. Jones. It can be served with process through its registered agent, Macy McFall, at 500 14th Street NW, Atlanta, GA 30318, in Fulton County, Georgia.

12. Defendant W. Burt Jones is the current Lt. Governor of the State of Georgia. On July 8, 2025, Mr. Jones announced his campaign for Governor.

13. Defendant Burt Jones for Georgia, Inc., is Mr. Jones' campaign committee, as defined by Georgia law, O.C.G.A. § 21-5-3(2). It can be served with process through its registered agent, Macy McFall, at 500 14th Street NW, Atlanta, GA 30318, in Fulton County, Georgia.

14. Mr. Jones is a state official.

15. Mr. Jones has *de facto* and *de jure* control of WBJ Leadership Committee and its operations.

16. WBJ Leadership Committee's functioning is entirely dependent upon and intertwined with Mr. Jones. If Mr. Jones ceases to hold the office of Lt.

Governor, he cannot continue to chair WBJ Leadership Committee unless he holds some other position that makes him eligible under O.C.G.A. § 21-5-34.2.

17. As a result, WBJ Leadership Committee is a state actor for purposes of 42 U.S.C. § 1983.

18. All Defendants acted under color of state law at all times relevant to this action.

19. All Defendants are sued for declaratory and injunctive relief, as noted below.

### **JURISDICTION AND VENUE**

20. This Court has subject-matter jurisdiction because this case involves constitutional violations. 28 U.S.C. § 1331. Further, this action is brought under 42 U.S.C. §§ 1983 and 1988 to enforce rights guaranteed by the First and Fourteenth Amendments to the U.S. Constitution.

21. Declaratory and injunctive relief is authorized by 28 U.S.C. §§ 2201 and 2202.

22. This Court has personal jurisdiction over all Defendants, who are sued in their personal and/or official capacities and all reside in Georgia.

23. Venue is proper in this District because at least one Defendant resides in this District and all defendants are residents of the State of Georgia, and because

a substantial part of the events giving rise to the claims occurred within this District. 28 U.S.C. § 1391(b).

### **STANDING ALLEGATIONS**

24. Plaintiffs are suffering a direct injury because they are subject to campaign-contribution limits that do not apply to Mr. Jones and his leadership committee.

25. Mr. Jones' leadership committee can raise unlimited funds, fully coordinate the activities of that committee with his principal campaign committee, and raise funds during the legislative session.

26. Mr. Carr is unable under Georgia law to create a leadership committee or any other entity to raise unlimited funds and fully coordinate its activities with his campaign committee.

27. Also, unlike Mr. Jones, Mr. Carr is unable to raise funds for his gubernatorial campaign or any other campaign entity during the legislative session.

28. As a result of the unequal contribution limits applied to gubernatorial primary candidates in the same race—which manifest in the incumbent Lt. Governor's ability to chair and control a leadership committee—Mr. Jones is able to expend substantially more funds than Mr. Carr, including raising funds in unlimited amounts that can be used to attack Mr. Carr.

29. Plaintiffs' injuries are caused by the unequal contribution limits resulting from Mr. Jones' use of his leadership committee.

30. Further, Mr. Jones' actions and use of his leadership committee also have a chilling effect on fundraising for and the political activity of Plaintiffs, which causes further injury to Plaintiffs.

31. Upon information and belief, Mr. Jones is raising funds for and using his leadership committee to promote his candidacy for Governor and benefit his campaign committee, which harms Mr. Carr's candidacy by limiting fundraising and ensuring unequal allocation of resources.

32. Plaintiffs' harms are traceable to the ability of Defendants to raise and spend unlimited funds under Georgia law.

33. Plaintiffs' injuries will be redressed if this Court grants the requested relief.

### **FACTUAL ALLEGATIONS**

34. Due to the First-Amendment implications of campaign-finance regulations, laws limiting speech cannot be upheld unless they satisfy at least "exacting scrutiny." *Ams. for Prosperity Found. v. Bonta*, 594 U.S. 595, 607 (2021). That is, a regulation limiting campaign contributions or expenditures must be "justified by a compelling state interest," *Davis*, 554 U.S. at 740 (citations omitted),

and be “narrowly tailored” to that interest, *Randall v. Sorrell*, 548 U.S. 230, 261 (2006); see also *FEC v. Massachusetts Citizens for Life, Inc.*, 479 U.S. 238, 261 (1986).

35. Plaintiffs are also entitled to equal protection under the law, especially where, as here, uneven and discriminatory treatment burdens his First Amendment rights in a political campaign. To justify such unequal treatment, a law must satisfy “greater scrutiny.” See *Riddle v. Hickenlooper*, 742 F.3d 922, 927 (10th Cir. 2014).

36. This Court has previously ruled that the leadership committee statute “effectively negates the contribution limit upon which all candidates for Governor in the primary election are bound for just one person.” *Perdue*, 584 F. Supp. 3d at 1323; see also *One Georgia, Inc.*, 601 F. Supp. 3d at 1309.

#### **I. GEORGIA’S GOVERNMENT TRANSPARENCY AND CAMPAIGN FINANCE ACT.**

37. Apart from leadership committees, Georgia law governing campaign finance applies equally to all gubernatorial candidates and their campaign committees. Specifically, the Act prohibits any statewide “candidate or campaign committee” from receiving contributions “in the aggregate” from any person exceeding \$8,400 for the primary election and \$4,800 for the primary runoff election, as adjusted by the Ethics Commission. O.C.G.A. § 21-5-41(a); <https://ethics.ga.gov/candidate-information-statewide/> (setting current limits based on inflation adjustments).



38. Georgia law provides that campaign contributions “shall be utilized only to defray ordinary and necessary expenses” of the campaign, O.C.G.A. § 21-5-33(a), which include “expenditures made during the reporting period for qualifying fees, office costs and rent, lodging, equipment, travel, advertising, postage, staff salaries, consultants, files storage, polling, special events, volunteers, reimbursements to volunteers, repayment of any loans received . . . , contributions to nonprofit organizations, flowers for special occasions, . . . [and] attorney fees connected to and in the furtherance of the campaign.” O.C.G.A. § 21-5-3(18).

39. Candidates may only have a single authorized campaign committee. O.C.G.A. § 21-5-30; Ethics Commission Advisory Opinion 2017-05.

## **II. LEADERSHIP COMMITTEES.**

40. Leadership committees added another vehicle for certain candidates and officeholders, including the Lt. Governor, to set up a committee separate from their principal campaign committee which “may accept contributions or make expenditures for the purpose of affecting the outcome of any election or advocating for the election or defeat of any candidate[, and] may defray ordinary and necessary expenses incurred in connection with any candidate’s campaign for elective office . . . .” O.C.G.A. §§ 21-5-34.2(a), (d).

41. The statute also provides that “the contribution limits [established in the Act] *shall not apply* to contributions to a leadership committee or expenditures

made by a leadership committee in support of a candidate . . . .” O.C.G.A. § 21-5-34.2(e) (emphasis added).

42. A leadership committee can accept unlimited contributions and it can make unlimited expenditures benefitting the incumbent chairperson’s candidacy, without such spending counting as a contribution to the incumbent candidate or his campaign committee. O.C.G.A. §§ 21-5-34.2(d), (f).

43. Further, leadership committees permit candidates, regardless of their status as elected officials, to raise money during a legislative session.

44. Members of the General Assembly and non-judicial statewide elected officials, including Mr. Carr, are prohibited from raising money for their campaign committees during the legislative session. O.C.G.A. § 21-5-35.

45. But this prohibition does not apply to leadership committees, because they are not “campaign committees” for purposes of Georgia law. *Id.*

46. As a result, Mr. Carr and his campaign committee for Governor are not allowed to raise funds during the legislative session, even though he has no involvement in the legislative process.

47. But Mr. Jones can – and did – raise funds for his leadership committee during the most recent legislative session.

48. That included tens of thousands of dollars from lobbyists and entities with lobbyists according to the filed reports for WBJ Leadership Committee.

- a. For example, on March 17, 2025, three registered lobbyists gave a total of \$30,000 to Mr. Jones' leadership committee.
- b. On February 10, 2025, a company gave \$100,000 to Mr. Jones' leadership committee.
- c. On February 13, 2025, another company gave \$25,000 to Mr. Jones' leadership committee.
- d. On March 7, 2025, a CEO of a hospital network gave \$15,000 to Mr. Jones' leadership committee.

49. All of these contributions (and many more) came during the legislative session when the Lt. Governor was presiding over the Senate on a daily basis and when Mr. Carr and his campaign for Governor were prohibited from fundraising.

50. While the government "interests underlying contribution limits," are only "preventing corruption and the appearance of corruption," *Randall*, 548 U.S. at 248, those interests cannot exist when unlimited fundraising is permitted by officials directly involved in the legislative process – especially when officials like Mr. Carr who are not directly involved in the legislative process are prohibited from raising any funds during the legislative session.

51. No other candidate for Georgia's gubernatorial race – in a primary or the general election – may chair a leadership committee unless and until they win

a political party's nomination in a primary election. O.C.G.A. § 21-5-34.2(a); *One Georgia, Inc.*, 601 F. Supp. 3d at 1299.

52. Mr. Jones is acting with significant aid from the State because of the specific authorization of leadership committees under Georgia law. Without specific state authorization for the Lt. Governor to have access to a leadership committee, he would have to abide by the same contribution and fundraising limitations as any other candidate.

53. Unlike Mr. Jones, Mr. Carr is not authorized to chair his own leadership committee or otherwise coordinate with another political committee to promote his candidacy in the primary election. *See* Ga. Comp. R. & Regs. 189-3-.01(9)(f); Commission Advisory Opinion 2017-05.

54. The Republican primary for Georgia Governor will take place on May 19, 2026. Because Mr. Jones has access to a leadership committee by virtue of his position and Mr. Carr does not, Mr. Jones can raise funds from contributors in unlimited amounts, and use these unlimited funds to make expenditures benefitting his candidacy and campaign committee before any other gubernatorial candidate is even eligible to chair a leadership committee. Meanwhile, Mr. Carr is only allowed a single campaign committee and will never be able to raise and spend funds equally with Mr. Jones during the primary election.

55. If Mr. Jones were not using his leadership committee in the primary election, then there would be no issue because all candidates would be under the same contribution limits. But that is not what is happening in the gubernatorial primary election.

56. On information and belief, Mr. Jones is continuing to raise funds from contributors for his leadership committee to benefit his primary and general election campaign for Governor.

57. On information and belief, Mr. Jones is representing to the public and potential donors that the funds in his leadership committee are funds he is able to use and plans to use in his primary campaign for Governor.

58. Mr. Jones has reported to the Ethics Commission that he has more than \$14 million available to spend in his leadership committee, including funds raised in tranches of \$50,000 and \$100,000 from single donors.

59. On information and belief, Mr. Jones has already expended funds from his leadership committee to support his candidacy for Governor in the primary election.

60. On information and belief, Mr. Jones and his principal campaign committee staff are fully coordinating with his leadership committee, including utilizing the same staff members for both entities.

61. On information and belief, Mr. Jones has full knowledge of this Court's ruling in *Perdue*, 584 F. Supp. 3d at 1323, and *One Georgia, Inc.*, 601 F. Supp. 3d at 1309, and is using his leadership committee in a primary election anyway.

62. Further, Mr. Jones reported that he made a sizable loan to his leadership committee totaling \$10 million.

63. Mr. Jones reported making this \$10 million loan despite reporting on his personal financial disclosure in 2021 that he had a total net worth of \$12 million, only \$700,000 of which was in cash and cash equivalents.

64. The concept that Mr. Jones could acquire \$10 million of cash to loan his leadership committee over a four-year period strains credulity and Mr. Jones did not report the loan as from a bank or family member, as required by statute if either was the source.

65. If Mr. Jones is not accurately reporting the source of the loan, then the damage to Mr. Carr and his campaign committee is compounded.

66. The loan and its amount are significant because Mr. Jones is also able to raise unlimited funds into the leadership committee, then repay the loan from funds raised that then can be applied directly to his campaign account, effectively removing the contribution limits from those dollars.

67. Currently, no other candidate can loan money to an entity that can raise unlimited dollars for use in the candidate's principal campaign committee.

68. Even if Mr. Jones only uses the unlimited nature of fundraising into his leadership committee to effectively wash the money of contribution limits by repaying his personal loan using unlimited donor funds, then moving those funds as personal dollars into his candidate committee, that still has a massive impact on the “[d]iscussion of public issues and debate on the qualifications of candidates [which] are integral to the operation of the system of government established by our Constitution.” *Buckley v. Valeo*, 424 U.S. 1, 14 (1976).

69. Further, if the source of Mr. Jones’ loan was not his own personal assets, then he can use his leadership committee to forever avoid disclosure of the source of the loan he received because of the ability to raise funds and repay them before the next reporting deadline.

70. The actions of Mr. Jones affect Mr. Carr’s campaign in an area where “[t]he First Amendment affords the broadest protection . . . in order ‘to assure (the) unfettered interchange of ideas for the bringing about of political and social changes desired by the people.’” *Buckley*, 424 U.S. at 14 (quoting *Roth v. United States*, 354 U.S. 476, 484 (1957)).

71. Because of Mr. Jones’ coordinated spending from his leadership committee, Plaintiffs will suffer ongoing and irreparable harm in Mr. Carr’s campaign for Governor because Plaintiffs are still bound by the contribution limits

of Georgia law and must raise a significant amount of additional contributions to begin to have funds similar to those of Mr. Jones.

**COUNT I - VIOLATION OF RIGHTS TO FREEDOM OF SPEECH AND  
ASSOCIATION UNDER THE FIRST AND FOURTEENTH AMENDMENTS  
THROUGH 42 U.S.C. § 1983.**

72. Plaintiffs incorporate by reference paragraphs 1 through 71 above.

73. The First Amendment, as applied to the states by the Fourteenth Amendment and enforced by 42 U.S.C. § 1983, guarantees protection of the freedom of association and the freedom of speech. Included within these protections is the right to participate freely in political activities, without the imposition of unequal campaign-finance regulations that favor one candidate over others. *See Davis*, 554 U.S. at 737; *Arizona Free Enter. Club's Freedom Club PAC v. Bennett*, 564 U.S. 721, 736–40 (2011).

74. Georgia has long placed limitations on the amount of money that a person may contribute to a candidate or campaign committee. *See* O.C.G.A. § 21-5-41(a), (b). Prior to the creation of leadership committees, these contribution limits applied equally to each candidate or campaign committee, regardless of incumbency.

75. Leadership committees change these campaign finance rules for certain incumbents running for higher office. The current statutory structure grants Mr. Jones the ability to chair a leadership committee, which may accept



unlimited contributions and make unlimited expenditures, and which functions as an effective second campaign committee. O.C.G.A. § 21-5-34.2(e).

76. Mr. Jones is choosing to use his leadership committee in the primary while all other gubernatorial candidates, including Mr. Carr, have only a single campaign committee, which remains bound by the statutory contribution limits, and may not chair a leadership committee unless and until he wins the primary election and secures the nomination of a political party.

77. As a result, Mr. Jones enjoys the ability to accept contributions – and ultimately spend them – in larger amounts than any other gubernatorial candidate in the 2026 Georgia primary election. Plaintiffs must seek and obtain an untold number of additional unique, unaggregated campaign contributions, substantially undermining any chance that they can obtain and expend the same amount of money as Mr. Jones.

78. Mr. Jones' choice to use his leadership committee in the primary ensures that, for purposes of the gubernatorial primary, Mr. Carr will never be able to compete on an equal fundraising and campaign spending footing because he cannot form a leadership committee. That is, Mr. Carr and his campaign committee will not have the opportunity to promote his message and exercise his First Amendment rights to the same extent as Mr. Jones and his campaign committees in the primary election.

79. The Supreme Court has “never upheld the constitutionality of a law that imposes different contribution limits for candidates who are competing against each other,” and the “unprecedented step of imposing different contribution . . . limits on candidates vying for the same seat is antithetical to the First Amendment.” *Davis*, 554 U.S. at 738, 743–44.

80. Accordingly, by removing any limitation on the campaign contributions that Mr. Jones may accept, while maintaining the contribution limits for all other gubernatorial primary candidates, Mr. Jones’ use of his leadership committee violates Mr. Carr’s First Amendment rights to free speech and free association. *Perdue*, 584 F. Supp. 3d at 1323; *One Georgia, Inc.*, 601 F. Supp. 3d at 1307.

81. The differential contribution limits in the 2026 gubernatorial primary further create an uneven and discriminatory campaign-finance regime that, on its face, requires Mr. Carr to expend additional efforts to seek and obtain additional unique and unaggregated campaign contributions, and causes Mr. Carr to expend limited funds and resources to counteract Mr. Jones’ effectively unlimited campaign speech.

82. The increased contribution allowance for leadership committees, permitted fundraising during the legislative session, and allowance for full coordination with Mr. Jones’ campaign committee serves no compelling,

important, substantial, or legitimate state interest that justifies the burden placed by the use of Mr. Jones' leadership committee on the free exercise of First Amendment rights. Nor is such discrimination an appropriately tailored means of advancing any legitimate state interest.

83. Plaintiffs have directly suffered, will continue to suffer, and is imminently threatened with suffering irreparable injuries to their freedom of speech and association under the First and Fourteenth Amendments of the U.S. Constitution by virtue of Mr. Jones' differential contribution limits through his choice to use his leadership committee in the primary election.

**COUNT II - VIOLATION OF EQUAL PROTECTION CLAUSE THROUGH 42 U.S.C. § 1983**

84. Plaintiffs incorporate paragraphs 1 through 83 above.

85. Under the Fourteenth Amendment to the U.S. Constitution and 42 U.S.C. § 1983, Mr. Carr has the right to enjoy the equal protection of the law, especially where, as here, unequal treatment under the law burdens the exercise of the fundamental right to free speech under the First Amendment.

86. An incumbent Lt. Governor and an incumbent Attorney General are similarly situated as candidates for governor – both are statewide elected officials. Yet, Mr. Jones' decision to use his leadership committee in the primary treats the current statewide elected officials unequally with respect to contribution limits

and session fundraising, based solely on his or her status as an eligible official to obtain a leadership committee.

87. This unequal treatment from Mr. Jones' decision gives him a significant competitive advantage over other candidates running in the same election. There is no compelling, important, substantial, or legitimate state interest that justifies such discrimination against challenger candidates.

88. There is no compelling, important, substantial, or legitimate state interest that justifies a discriminatory distribution of benefits and disadvantages based solely on a candidate's status as one of a handful of statewide elected officials who is eligible for a leadership committee.

89. Nor is such discrimination the least restrictive, narrowly tailored, direct, proportionate, or rational means of advancing any legitimate state interest.

90. Mr. Jones' decision to use his leadership committee in the primary results in uneven and discriminatory contribution limits, facially and as applied, violates Plaintiffs' right to equal protection of the law under the Fourteenth Amendment and 42 U.S.C. § 1983.

91. Plaintiffs have directly suffered, will continue to suffer, or is imminently threatened with suffering irreparable injury to his rights by virtue of Mr. Jones' differential contribution limits.

## **PRAYER FOR RELIEF**

92. WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against Defendants, as follows:

- a. Declare that Mr. Jones' use of his leadership committee in an election cycle where other candidates do not have access to them is unconstitutional as applied to WBJ Leadership Committee, Inc.;
- b. Preliminarily and permanently enjoin any leadership committee chaired by Mr. Jones, including WBJ Leadership Committee, Inc., from accepting contributions or making expenditures until after the conclusion of the 2026 gubernatorial primary;
- c. Preliminarily and permanently enjoin Mr. Jones and WBJ Leadership Committee, Inc., from making expenditures of leadership committee funds "for the purpose of affecting the outcome of [the] election" between Mr. Jones and Mr. Carr, including by enjoining Mr. Jones and WBJ Leadership Committee from making expenditures of leadership committee funds for advertisements or other communications that depict or reference Mr. Jones or Mr. Carr (O.C.G.A. § 21-5-34.2(f));
- d. Appoint a magistrate judge to oversee all spending by Mr. Jones, Burt Jones for Georgia, Inc., and WBJ Leadership Committee, Inc.,

and require WBJ Leadership Committee, Inc., to report to the Court the specific transactions in support of Mr. Jones' primary campaign for Governor that have been made by WBJ Leadership Committee from July 8, 2025 to the present, including documentation of the source of all loans made by Mr. Jones to WBJ Leadership Committee, Inc.;

- e. Require Mr. Jones and WBJ Leadership Committee, Inc. to reverse all transactions paid for by WBJ Leadership Committee, Inc. that support the election of Mr. Jones to the office of Governor from July 8, 2025 to the present;
- f. To the extent transactions by WBJ Leadership Committee, Inc., cannot be reversed or refunded, require Mr. Jones to transfer from his principal campaign committee, Burt Jones for Georgia, Inc., to WBJ Leadership Committee, Inc., an amount equal to the funds already expended by WBJ Leadership Committee to support the election of Mr. Jones to the office of Governor from July 8, 2025 to the present;
- g. Preliminarily and permanently enjoin Mr. Jones from repaying personal loans made to WBJ Leadership Committee, Inc. until after the 2026 gubernatorial primary is complete;

- h. Preliminarily and permanently enjoin Mr. Jones and WBJ Leadership Committee, Inc., from transferring any funds from WBJ Leadership Committee, Inc., to other nonprofit organizations, including, but not limited to, 501(c)(4) organizations;
- i. Preliminarily and permanently enjoin Mr. Jones from loaning any funds to Burt Jones for Georgia, Inc., until after the primary election in 2026 is complete;
- j. Preliminarily and permanently enjoin Mr. Jones and WBJ Leadership Committee, Inc. from making expenditures of leadership committee funds “for the purpose of . . . advocating for the election” of Mr. Jones “or defeat” of Mr. Carr (O.C.G.A. § 21-5-34.2(f));
- k. Preliminarily and permanently enjoin Mr. Jones and WBJ Leadership Committee, Inc. from making expenditures of leadership committee funds to “defray ordinary and necessary expenses incurred in connection with [Mr. Jones’] campaign for elective office” in the primary election for Governor (O.C.G.A. § 21-5-34.2(f));
- l. Preliminarily and permanently enjoin Mr. Jones and WBJ Leadership Committee, Inc. from making expenditures of

leadership committee funds to “defray ordinary and necessary expenses incurred in connection with [Mr. Jones’] fulfillment or retention of [his] office” (O.C.G.A. § 21-5-34.2(f));

- m. Award Plaintiffs their allowable costs and attorneys’ fees pursuant to 42 U.S.C. § 1988 or any other basis in law, as appropriate; and
- n. Maintain jurisdiction to ensure this Court’s orders are followed.

Respectfully submitted this 7th day of August, 2025.

/s/ Bryan P. Tyson

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