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

IN RE: SEARCH WARRANT	)	1:19-MC-1299
	)	

MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION AND TO DISQUALIFY THE UNITED STATES ATTORNEY'S OFFICE FOR THE NORTHERN DISTRICT OF GEORGIA

COMES NOW Jim A. Beard, by and through undersigned counsel, and hereby moves for a temporary restraining order and preliminary injunction preventing the United States Department of Justice from further violating Mr. Beard's constitutional and common law rights by reviewing potentially privileged communications contained in certain seized emails. Specifically, Mr. Beard seeks an Order enjoining the government from any further review of his personal emails unless and until an independent privilege review is conducted.

Moreover, due to the inherent and serious legal and constitutional issues that come with DOJ-composed "filter teams," and because members of the United States Attorneys' Office for the Northern District of Georgia have already reviewed potentially privileged communications without an independent review, Mr. Beard also moves to disqualify the United States Attorneys' Office for the

Northern District of Georgia, as well as any government employee or agent currently involved in the investigation, from any further involvement in this matter. In further support of this Motion, Mr. Beard shows as follows.

FACTUAL BACKGROUND

Mr. Beard served as the Chief Financial Officer for the City of Atlanta from late 2011 to May 2018. Mr. Beard has been one of numerous apparent subjects of the DOJ's ongoing investigation related to the administration of former Atlanta Mayor Kasim Reed for at least two years. Despite not having been charged with, let alone convicted of, a crime, the government has engaged in a campaign of repeated harassment and intimidation that has caused Mr. Beard great financial and personal harm. Even before the conduct giving rise to this Motion, which is discussed in more detail below, the government has not only targeted and harassed Mr. Beard, but his family, friends, former colleagues, and acquaintances as well. This includes, among other things:

- Sending FBI agents to interview Mr. Beard's minor son at his mother's house in Gainesville, Florida, where they asked questions completely irrelevant to their investigation including, among other things, whether Mr. Beard was current with his child support;

- Sending FBI agents to interview Mr. Beard's 22-year old step-daughter at her new place of employment during work hours, and then insisting that she travel to Atlanta to make a brief appearance before the grand jury, rejecting multiple offers to simply give the information over the phone;
- Executing a search warrant and seizing Mr. Beard's wife's cell phone;
- Sending FBI agents to confront numerous of Mr. Beard's friends and acquaintances at their homes or places of employment to ask completely irrelevant questions regarding Mr. Beard's personal relationships;
- Sending multiple subpoenas and search warrants to various entities, including banks, email providers, and social media companies for information regarding Mr. Beard.

While each of these things, taken individually, might very well be within the DOJ's investigative prerogative, taken together over the course of the last two years, it demonstrates a clear pattern of harassment and intimidation designed not simply to seek the truth, but to destroy a life. All of this has made it impossible for Mr. Beard to live a normal life, including finding employment to enable him to support himself and his family.

The AOL Search Warrant and Filter Team

On April 16, 2020, counsel for the government informed undersigned counsel for Mr. Beard, via email, that the government had obtained a search warrant for the Mr. Beard's personal AOL email account for a time period spanning nearly three years; from August 1, 2015, to April 1, 2018. ***See Exhibit A***.[1] In that same email, counsel for the government informed undersigned counsel that a "filter team" – comprised solely of government employees and agents[2] – had reviewed the responsive materials and employed certain search terms in an attempt "to filter out and segregate any privileged records." *Id.* Counsel for the government also informed undersigned counsel for Mr. Beard that the filter team plans to turn the emails over to the prosecution team on April 24, 2020. *Id.*

The search terms that the government-composed filter team apparently used to "filter out and segregate any privileged records" contain the name of various

[1] Although it is not the topic of this motion, it is worth noting that a search warrant for all emails for a three year period raises separate, yet equally serious, Fourth Amendment issues due to its breadth. *See United States v. Blake*, 868 F.3d 960, (11th Cir. 2017) (raising concerns over search warrants served on Facebook in light of the Fourth Amendment's particularity requirement). But Mr. Beard will save that argument perhaps for another day.

[2] Undersigned counsel for Mr. Beard has since confirmed in a telephone call and subsequent emails with counsel for the government that the filter team consisted of two local FBI agents and one Assistant United States Attorney for the Northern District of Georgia.

attorneys and law firms that Mr. Beard would have been in regular contact with, as well as the name of Mr. Beard's wife. ***See Exhibit B***.[3] The fact that the government felt it necessary to fill an entire double-columned page with the names of attorneys and law firms demonstrates their keen awareness that it was highly likely that a three-year tranche of Mr. Beard's personal emails from AOL would contain privileged communications, whether attorney-client, work-product, or spousal in nature.

As argued in further detail below, the government should be enjoined from reviewing any of Mr. Beard's personal emails until an independent privilege review is conducted. Simply put, a "filter team" composed of two local FBI agents and a fellow member of the same U.S. Attorney's Office investigating this case is woefully inadequate to ensure that Mr. Beard's constitutional and common law rights are protected.

Moreover, because a member of this U.S. Attorney's Office and two local FBI agents have already reviewed three years worth of Mr. Beard's emails, very likely including numerous emails that are, in fact, privileged, the U.S. Attorney's

[3] At the request of the prosecutor, the list of search terms is being filed under seal. Curiously, in his email to undersigned counsel, Mr. Davis stated that the filter team used these search terms "among others," but did not disclose to undersigned counsel for Mr. Beard what "other" search terms were used.

Office for the Northern District of Georgia should be disqualified from continuing to participate in this investigation, from presenting this case to a grand jury, and from any future litigation that might ensue.

LEGAL STANDARD FOR A PRELIMINARY INJUNCTION

Mr. Beard is entitled to a preliminary injunction so long as he can establish that he is substantially likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest. *See, e.g., Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008). Mr. Beard plainly satisfies each of these requirements and, therefore, is entitled to a temporary restraining order and preliminary injunction preventing the government from any further review of his personal emails without an independent privilege review.

ARGUMENT IN SUPPORT OF PRELIMINARY INJUCTION

A. Substantial Likelihood of Success on the Merits

Mr. Beard is substantially likely to succeed on the merits. A recent decision from the Fourth Circuit Court of Appeals is instructive. In *In Re: Search Warrant*, the DOJ seized, pursuant to a validly-issued search warrant, a large quantity of emails that were highly likely to contain privileged communications. 942 F.3d

159, 168-69 (4th Cir. 2019). After seizing the emails, the government reviewed the emails pursuant to a "filter protocol," which had been expressly authorized by the same Magistrate Judge who signed the search warrant, but this procedure was approved in an *ex parte* proceeding. *Id.* at 165-66.

Pursuant to that filter protocol, the government in that case did something very similar to what the government appears to have done in this case: the filter team identified and separated privileged and potentially privileged materials and non-privileged materials were forwarded to the prosecution team. *Id.* Importantly, the filter protocol that was ultimately rejected by the Fourth Circuit as constitutionally and legally flawed actually appears to have been ***less egregious*** than the one the government implemented in this case, as the protocol in the Fourth Circuit case provided that seized materials that were potentially privileged were provided to defense counsel in an attempt to reach an agreement concerning privilege before being sent to the prosecution team. *Id.* That was not done, or even offered, here. [4]

[4] There was absolutely no attempt by the government in this case to inform counsel for Mr. Beard of the seizure before the filter team started and then completed its review. There was no legitimate reason that the government could not have reached out to defense counsel after the seizure but before the filter team had begun its review in an attempt to either obtain an agreement on the search protocol

In *In Re: Search Warrant*, the party whose emails were seized (a law firm) filed a motion for a temporary restraining order and preliminary injunction, arguing that the filter team process was legally flawed and that a Magistrate Judge or the District Court, rather than a DOJ filter team, should perform the privilege review of the seized materials. *Id.*[5] The District Court denied the motion, but the Fourth Circuit reversed. *Id.* at 168-70.

In concluding that the movant had met its burden of showing substantial likelihood of success on the merits, the Fourth Circuit agreed with the movant that "the Filter Team and its Protocol are simply 'incompatible with courts' historical protection of the attorney-client privilege and the work-product doctrine.'" *Id.* at 175. The Fourth Circuit cited the movant's arguments that "there is a clear appearance of – and potential for – improprieties when government agents are authorized to rummage through attorney-client communications" and that the use

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or give defense counsel the opportunity to seek court intervention before the review had begun.

[5] The fact that the movant in *In Re: Search Warrant* was a law firm, while discussed by the Fourth Circuit, was not dispositive of the Court's ultimate conclusion that a government filter team was legally and constitutionally flawed. This is clearly demonstrated by the fact that the main case relied upon by the Fourth Circuit (the Sixth Circuit case *In re Grand Jury Subpoenas* cited in detail below), did *not* involve a subpoena to a law firm. Nevertheless, the Sixth Circuit also found the DOJ filter team process to be legally and constitutionally flawed.

of the filter team would "chill the free flow of information between clients and lawyers." *Id.*

The Fourth Circuit held that multiple errors had been committed below. First was a separation of powers problem. Specifically, the Fourth Circuit held that the Magistrate Judge who authorized the filter protocols in that case erred "in assigning judicial functions to the executive branch." *Id.* at 176. The Fourth Circuit noted that not only was it an error to delegate judicial functions to employees of the DOJ – an executive branch agency – but that it was even further error to delegate those functions to non-lawyer members of the filter team such as paralegals and law enforcement agents. *Id.* at 177.

The Fourth Circuit also noted that, in addition to the separation of powers issues that arose from the filter protocol, there was a possibility that the filter team – *even if* it was composed entirely of trained lawyers – "will make errors in privilege determinations and in transmitting seized materials to an investigation or prosecution team." *Id.* The Fourth Circuit cited the Sixth Circuit's decision in *In re Grand Jury Subpoenas*, which held that **"such filter teams present 'reasonably foreseeable risks to privilege' and 'have been implicated . . . in leaks of confidential information to prosecutors."** *Id.* (citing *In re Grand Jury*

Subpoenas, 454 F.3d 511, 523 (6th Cir. 2006) (emphasis added)).[6] "A filter team might 'have an interest in preserving privilege, but it also possesses a conflicting interest in pursuing the investigation, and . . . some [filter] team attorneys will make mistakes or violate their ethical obligations. **It is thus logical to suppose that [filter] teams pose a serious risk to holders of privilege."** *Id.* (emphasis added).

In addition to what both the Fourth and Sixth Circuits described as the reasonably foreseeable risk of leaks and ethical quandaries, those courts also discussed filter team errors "that can rise from differences of opinion" and "from mistakes or neglect." *Id.* The courts cited an "infamous" occurrence in the Manuel Noriega prosecution where the government's filter team missed "a document obviously protected by attorney-client privilege," thereby pointing "to an obvious flaw in the [filter] team procedure: ***the government's fox is left in***

[6] The Sixth circuit in *In re Grand Jury Subpoenas*, like the Fourth Circuit in *In Re: Search Warrant*, rejected the idea of a DOJ-staffed filter team and mandated that the District Court employ a Special Master to perform the first level of privilege review. *Id.* at 524.

charge of the [law firm's] henhouse, and may err by neglect or malice, as well as by honest differences of opinion." *Id.* at 177-78.[7]

This case is no different other than the fact that the filter protocol apparently put into place in this case was actually *more problematic* than the one rejected by the Fourth Circuit. Regardless of whatever best intentions may have led to the government in this case forming a DOJ filter team to review nearly three-years worth of personal emails for privilege, and informing counsel for Mr. Beard of this fact only *after* that review was complete and the damage had already been done, the protocol that was put into place by the government in this case suffers from the same exact flaws that were discussed at length by both the Fourth and Sixth Circuits. For the same reasons discussed in those opinions, Mr. Beard has a

[7] Other Courts have made similar rulings. For example, in *United States v. Castro*, the District Court for the Eastern District of Michigan recently adopted the reasoning of both the Fourth and Sixth Circuits discussed above, rejected the idea of a DOJ filter team, and appointed a Special Master to conduct a privilege review. 2020 WL 241112, at *2 (E.D. Mich. Jan. 16, 2020).

In *In re Search of Electronic Communications*, the Third Circuit Court of Appeals cited the Sixth Circuit's decision and noted that "a court always retains the prerogative to require a different method of review in any particular case, such as requiring the use of a special master or reviewing the seized documents *in camera* itself." 802 F.3d 516, 530 n. 53 (3d Cir. 2015) (citing various cases, including *Black v. United States*, 172 F.R.D. 511, 516 (S.D. Fla. 1997) and *United States v. Abbell*, 914 F. Supp. 519, 520-21)).

substantial likelihood to succeed on the merits of his arguments that the filter team and protocol employed by the government was fatally flawed.

B. Irreparable Harm

Mr. Beard can also establish irreparable harm. In reversing the district court, the Fourth Circuit in *In Re: Search Warrant* noted that the attorney-client privilege is "the oldest of the privileges for confidential communications known to the common law." *Id.* at 172-73 (citing *Upjohn Co. v. United States*, 449 U.S. 383, 389 (1981)). Citing the Supreme Court's decision in *Upjohn*, the Fourth Circuit noted that "[t]he purpose of the attorney-client privilege is to ensure 'full and frank communication' between a client and his lawyer and 'thereby promote broader public interests in the observance of law and administration of justice." *Id.* at 173 (citing *Upjohn*, 449 U.S. at 389). "[T]he attorney-client privilege exists because 'sound legal advice or advocacy serves public ends and . . . such advice or advocacy depends upon the lawyer's being fully informed by the client." *Id.* (citing *Upjohn*, 449 U.S. at 389).

The Fourth Circuit also noted that, in addition to the attorney-client privilege, emails between lawyers and clients also implicate the work-product doctrine. *Id.* "Although the work-product doctrine does not trace as fair into history as the attorney-client privilege, it is no less important." *Id.* The Fourth

Circuit again cited the United States Supreme Court's holding that a lawyer "must be able to 'work with a certain degree of privacy, free from unnecessary intrusion by opposing parties and their counsel." *Id.* (citing *Hickman v. Taylor*, 329 U.S. 495, 510-11 (1947)). The Court noted that one type of work product in particular – opinion work product (which represents "the actual thoughts and impressions of the attorney") "'enjoys a nearly absolute immunity' and can be discovered by adverse parties 'only in very rare and extraordinary circumstances.'" *Id.* at 174.

Not only are these important common law rights at issue, but also at issue are fundamental constitutional rights. As the Fourth Circuit noted, the attorney-client privilege and the work-product doctrine "jointly support" the Constitution's guarantee of effective assistance of counsel. *Id.* (citing *Strickland v. Washington*, 466 U.S. 668, 686 (1984) (holding that the "essence" of the right to effective assistance of counsel is, indeed, privacy of communication with counsel." *Id.* "Absent privacy of communications and the 'full and frank' discussions that flow therefrom, a lawyer could be deprived of the information necessary to prepare and present his client's defense." *Id.* (citing *Upjohn*, 449 U.S. at 389). Permitting full and frank communications between attorneys and clients also helps ensure the client's Fifth Amendment right to due process.

The work-product doctrine, as the Fourth Circuit held, also "fulfills an essential and important role" in ensuring the right to effective assistance of counsel. *Id.* Quoting the United States Supreme Court, the Fourth Circuit noted that the work-product doctrine "is vital to 'asssur[e] the proper functioning of the criminal justice system,' in that it 'provid[es] a privileged area within which [a lawyer] can analyze and prepare his client's case." *Id.* (citing *United States v. Nobles*, 422 U.S. 225, 238 (1975). "Without that 'privileged area,'" the Fourth Circuit held, "a lawyer's ability to plan and present his client's defense will be impaired." *Id.* at 174-75 (citing *Nobles*, 422 U.S. at 238).

The Fourth Circuit in *In Re: Search Warrant* held that the district court erred in finding that the movant in that case had not established a likelihood of irreparable harm because it afforded "insignificant weight to the foregoing principles protecting attorney-client relationships." The Court held that the district court had "failed to recognize that an adverse party's review of privileged material seriously injures the privilege holder." *Id.* (citing *U.S. v. Philip Morris, Inc.*, 314 F.3d 612, 622 (D.C. Cir. 2003)). The Court concluded that the movant had established irreparable harm in that the filter team's review of the materials in question "was and is injurious" and that the harm "is plainly irreparable, ***in that the Filter Team's review of those privileged materials cannot be undone***." *Id.*

(emphasis added). For those very same reasons, Mr. Beard also satisfied the irreparable harm requirement.

C. The Equities Weigh in Mr. Beard's Favor

The equities in this case weigh in Mr. Beard's favor. As the Fourth Circuit held in *In Re: Search Warrant*, the harm caused by "continuing the Filter Team's review outweighs any harm to the government that might result from the magistrate judge conducting the privilege review of the seized material." *Id. at* 181. The Fourth Circuit rejected the government's argument that requiring a Magistrate Judge to review the seized material would "unduly delay the government's investigations." *Id.* The Court held that "[a]lthough efficient criminal investigations are certainly desirable, we are not persuaded that the claimed delay in its investigations weigh in the government's favor." *Id.*[8]

For the same reasons outlined by the Fourth Circuit above, the equities in this case weigh in favor of Mr. Beard.

D. An Injunction is in the Public Interest

[8] In *In Re: Search Warrant*, the government argued that the equities worked in its favor because the movant waited ten days after the search to file its injunction requests. *Id.* at 182. Although the Fourth Circuit flatly rejected that argument, it is still worth noting that, here, Mr. Beard is filing his injunction within a couple of days of first learning of the search and seizure, via email from the prosecutor, which came *after* the filter team had apparently already completed its review.

Finally, an injunction in this case is in the public interest. As the Fourth Circuit, citing the United States Supreme Court, held in *In Re: Search Warrant*, "an award of injunction relief in these circumstances supports the 'strong public interest' in the integrity of the judicial system." *Id.* at 182 (citing *U.S. v. Hasting,* 461 U.S. 499, 527 (1983)). "Due to the appearance of unfairness caused by the Filter Team, and in view of the other problems associated with the Filter Team, it is surprising that the government has so vigorously supported it. We simply observe that prosecutors have a responsibility to not only see that justice is done, but also ensure that justice appears to be done." *Id.* at 183. Federal agents and prosecutors "rummaging through" materials that are "protected by the attorney-client privilege and the work-product doctrine is at odds with the appearance of justice." *Id.*

For these same reasons, an injunction in this case is in the public interest.

The Court Should Enjoin Any Further Review of the Seized Materials

For all of the reasons stated above, the filter team and the protocols that the government has employed in this case were improper and injunctive relief is warranted. Accordingly, this Court should enjoin any further review of the seized materials by any government employee or agent, and order an independent

privilege review, whether by the District Court, a Magistrate Judge, or a Special Master.

THE UNITED STATES ATTORNEY'S OFFICE FOR THE NORTHERN DISTRICT OF GEORGIA SHOULD BE DISQUALIFIED

Although Mr. Beard is requesting an independent privilege review, unfortunately, the government's conduct in this case has already created irreparable harm that simply cannot be resolved absent the disqualification of the United States Attorney's Office for the Northern District of Georgia from further participation in this investigation. Simply put, the damage has already been done.

As discussed above, and as two separate circuit courts have found, the use of a government-composed filter team raises serious issues of constitutional magnitude. As the Sixth Circuit held in *In re Grand Jury Subpoenas*, "such filter teams present 'reasonably foreseeable risks to privilege' and 'have been implicated . . . in leaks of confidential information to prosecutors," and "might 'have an interest in preserving privilege, but it also possesses a conflicting interest in pursuing the investigation, and . . . some [filter] team attorneys will make mistakes or violate their ethical obligations. It is thus logical to suppose that [filter] teams pose a serious risk to holders of privilege." 454 F.3d at 523.

The likelihood that members of the government's filter team have already reviewed communications protected by the attorney-client privilege and the work-

product doctrine is high, if not near certain. This not only raises grave concerns related to these common law privileges, but has serious implications for Mr. Beard's constitutional rights as well. *See, e.g., In Re: Search Warrant*, 942 F.3d at 174 (citing the Supreme Court's decision in *Strickland v. Washington* and holding that the attorney-client privilege and the work-product doctrine "jointly support" the guarantee of effective assistance of counsel.).

And while the government has apparently attempted to institute certain procedures ostensibly in order to prevent members of the prosecution team from being tainted by such issues, for the reasons stated above, those procedures are woefully inadequate to ensure the protection of such important constitutional and common law rights. In fact, as discussed above, the procedures put into place by the government in this case appear to be *less comprehensive* than the ones that were flatly rejected by the Fourth Circuit. And, to make matters worse, unlike in the Fourth Circuit case where the Court intervened prior to the filter team finishing its review, it appears that the filter team in this case has already finished its review of all of the emails that it obtained pursuant to its search warrant, and that counsel for the government informed undersigned counsel for Mr. Beard of the existence of the search and seizure only *after* that review had been completed.

Despite what perhaps might very well be best intentions, the risk of privileged information making its way back to a member of the prosecution team, whether inadvertently or purposely, is simply too high to tolerate. It is well known that members of the U.S. Attorney's Office not only work together, but often times form personal relationships and friendships that continue outside of the confines of the federal building. It does not take a stretch of the imagination to contemplate a scenario where certain privileged information is shared with a member of the prosecution team, even if it is done without any bad intent.

And, not only was this filter team composed of a prosecutor from the same office as the prosecutors assigned to this case, but it also included other government employees, including federal agents. This only increases the risk of privileged information making its way back to members of the prosecution team, whether intentionally or completely innocently, and even in situations where the prosecution team does not even know that the information is tainted by privilege. That tainted information could then easily form the basis for further investigative activity, or even make its way into a presentation to the Grand Jury, even if inadvertently, and nobody would be the wiser. Even the slightest risk of this occurring cannot be tolerated given the serious constitutional concerns that would arise if it did.

As mentioned above, it is important to note the government could have potentially avoided any sort of disqualification argument by simply informing Mr. Beard's counsel of the seizure after it had occurred but *before* the filter team had started its review. This would have given Mr. Beard's counsel the opportunity to raise objections before the review had begun and to seek court intervention at that time. The government cannot argue that this would have risked document destruction as they would have made the notification only after they already had possession of the seized emails. Put simply, the government could have easily avoided this situation by taking proactive steps to ensure that Mr. Beard's legal and constitutional rights were protected before the irreparable harm had already occurred. They did not.

For these reasons, the Court should disqualify the United States Attorney's Office for the Northern District of Georgia, along with any other government employees or agents that have worked with members of the United States Attorney's Office on this matter, from participating any further in this investigation or any subsequent litigation.

CONCLUSION

For the reasons discussed above, Mr. Beard respectfully requests that this Court grant his motion for a temporary restraining order and preliminary injunction

and order that the government cease any further review of the seized email communications until an independent review is conducted, whether by the District Court, a Magistrate Judge, or a Special Master.

Further, Mr. Beard requests that this Court disqualify the United States Attorney's Office for the Northern District of Georgia, along with any other government employees or agents that have worked with members of the United States Attorney's Office on this matter, from participating any further in this investigation or any subsequent litigation.

Respectfully submitted, this 20th day of April, 2020,

s/ Scott R. Grubman
Scott R. Grubman (GA Bar No. 317011)
Attorney for Jim A. Beard
CHILIVIS, GRUBMAN, DALBEY & WARNER LLP
3127 Maple Drive, NE
Atlanta, Georgia 30305
(404) 233-4171
(404) 261-2842 (facsimile)
sgrubman@cglawfirm.com

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

Pursuant to Local Rule 7.1(D), I hereby certify that this document was prepared in Times New Roman 14-point font.

s/ Scott R. Grubman
Scott R. Grubman
Georgia Bar No. 317011
Attorney for Jim A. Beard

CHILIVIS, GRUBMAN, DALBEY & WARNER LLP
3127 Maple Drive, NE
Atlanta, Georgia 30305
(404) 233-4171
(404) 261-2842 (facsimile)
sgrubman@cglawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2020, I sent the foregoing Motion to counsel for the United States via electronic mail:

Mr. Jeffrey Davis
Assistant United States Attorney
Jeffrey.Davis2@usdoj.gov

s/ Scott R. Grubman
Scott R. Grubman
Georgia Bar No. 317011
Attorney for Jim A. Beard

CHILIVIS, GRUBMAN, DALBEY & WARNER LLP
3127 Maple Drive, NE
Atlanta, Georgia 30305
(404) 233-4171
(404) 261-2842 (facsimile)
sgrubman@cglawfirm.com