

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

SAFE AFFORDABLE GEORGIA,
INC.,

Plaintiff,

v.

JAMES D. KREYENBUHL, in his
official capacity as Chairman of the
State Ethics Commission; RICK
THOMPSON, in his official capacity
as Vice Chairman of the State Ethics
Commission; DAVID BURGE,
STAN WISE, and DANA DIMENT,
in their official capacities as
members of the State Ethics
Commission; and CHRISTOPHER
M. CARR, in his official capacity as
the Attorney General of Georgia,

Defendants.

Case No.

**PLAINTIFF'S EMERGENCY MOTION
FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff Safe Affordable Georgia, Inc. hereby moves this Court for an order preliminary enjoining the enforcement of the Georgia campaign finance laws and regulations that restrict its ability to raise and spend funds as compared to a leadership committee.

Plaintiff requests emergency treatment of this motion because the challenged laws and regulation greatly restrict Plaintiff's ability to support candidates of its choosing in the 2026 primary season currently underway. The granting of this motion is the only way to level the playing field.

Although Plaintiff does not seek a TRO or *ex parte* relief, Plaintiff does request a truncated briefing schedule and for the Court to set the motion for the earliest hearing convenient for the Court.

Plaintiff has provided a copy of the Complaint to the Defendants and informed them that this motion would be filed. Plaintiff will provide a copy of this motion to Defendants soon after it is filed.

For the reasons stated in the memorandum supporting this motion, Plaintiff respectfully requests the Court issue an order preliminarily enjoining Defendants, their officers, agents, servants, employees, and all persons in active concert or participation with them who receive actual notice of the injunction, from enforcing:

- a. O.C.G.A. § 21-5-30(a) to bar Safe Affordable Georgia, Inc. from accepting contributions made to bring about the nomination or election of a candidate for any office;
- b. O.C.G.A. § 21-5-41 to bar Safe Affordable Georgia, Inc., from coordinating its expenditures with candidate committees; and,

c. Ga. Comp. R. & Regs, R. 189-6-04, implementing O.C.G.A. § 21-5-41's contribution and coordination limits.

Plaintiff further requests the court find a bond is not necessary for the order to take effect.

Dated: December 8, 2025

Respectfully submitted,

/s/ Christopher S. Anulewicz

Christopher S. Anulewicz

Georgia Bar No. 020914

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/s/ Charles Miller

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**pro hac vice admission forthcoming*

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned certifies that the foregoing document has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

Dated: December 8, 2025

Respectfully submitted,

/s/ Charles Miller

Charles Miller

CERTIFICATE OF SERVICE

I certify that on December 8, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court through the CM/ECF system, which will send notice of electronic filing to all counsel of record.

Dated: December 8, 2025

Respectfully submitted,

/s/ Christopher S. Anulewicz

Christopher S. Anulewicz