

LIBERTY COUNSEL



Post Office Box 540774
Orlando, FL 32854-0774
Telephone: 407•875•1776
Facsimile: 407•875•0770
www.LC.org

122 C Street N.W., Suite 360
Washington, DC 20001
Telephone: 202•289•1776
Facsimile: 202•737•1776

Post Office Box 11108
Lynchburg, VA 24506-1108
Telephone: 434•592•7000
Facsimile: 434•592•7700
jchristman@LC.org

Reply to: Florida

July 11, 2016

VIA FIRST CLASS MAIL

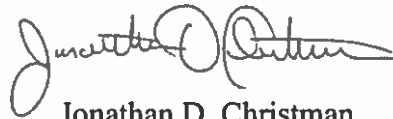
Anne L. Weismann
Executive Director
Campaign for Accountability
1201 Connecticut Avenue, N.W.
Suite 300
Washington, DC 20036

Re: Kentucky Open Records Act Request, and 16-ORD-133

Dear Ms. Weismann:

This letter is being provided by and on behalf of Kim Davis (“Ms. Davis”) in response to the Attorney General’s opinion dated June 30, 2016 in connection with the Campaign for Accountability’s (“CfA”) appeal of its Kentucky Open Records Act Request (“Request”). Ms. Davis has elected not to appeal the Attorney General’s decision (16-ORD-133). Therefore, Ms. Davis is producing to CfA the previously withheld documents consisting of twenty-one (21) pages that are the subject of the Attorney General’s opinion. Ms. Davis’ response to the Request is now complete.

Sincerely,



Jonathan D. Christman

Enclosures

Cc: Kimberly B. Davis, Rowan County Clerk (*via mail w/ enclosures*)

LIBERTY COUNSEL
Contract of Legal Representation

Liberty Counsel is a civil liberties education and legal defense organization which, to fulfill its purpose, provides legal representation to individuals, groups and other entities.

I, Kim Davis, Clerk of Rowan County, Kentucky, (hereinafter "Client"), above the age of eighteen, of sound mind and with full authority to enter into this Contract, do hereby retain Liberty Counsel to provide legal representation regarding the mandate for Kentucky county clerks to issue same-sex "marriage" licenses in the wake of *Obergefell v. Hodges*. Liberty Counsel will provide a defense against April Miller, Karen Ann Roberts, Shantel Burke, Stephen Napier, Jody Fernandez, Kevin Holloway, Aaron Skaggs, Barry Spartman, and/or any other additional opposing party or parties that may be later added in order to represent Client's claim and/or defense.

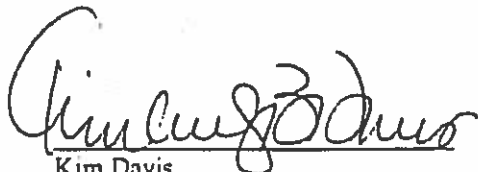
Liberty Counsel will provide legal representation outside of court, in a court of law, regulatory or administrative proceeding, including any appeals that Liberty Counsel deems advisable, by employing or associating with any attorney or law firm of its choice to assist in the representation of any matter at any time in the legal proceedings. Client agrees to be truthful at all times and reveal all information necessary and relevant to Client's case and shall fully cooperate in all legal proceedings.

Client understands that Liberty Counsel will request the court or administrative body to award attorney's fees and costs to be paid by the opposing party or parties in order to compensate Liberty Counsel, and any attorney or law firm working with or on behalf of Liberty Counsel, for attorney time, staff time, and costs expended with respect to the representation of Client. Client agrees to fully cooperate with Liberty Counsel with respect to any claim made by Liberty Counsel for the recovery of attorney's fees and costs against the opposing party or parties. Client also agrees and understands that any attorney's fees and costs recovered by Liberty Counsel from the opposing party or parties shall be paid directly to Liberty Counsel. If the opposing party or parties pays the amount for attorney's fees and costs directly to Client, Client agrees to immediately endorse the check payable to Liberty Counsel.

If Client terminates this Contract without the express written consent of Liberty Counsel's President, or if Client retains any other attorney or organization to provide legal representation, or retains any other attorney or organization as co-counsel without the express written consent of Liberty Counsel's President, Client understands and hereby acknowledges that Client shall be responsible for payment of attorney's fees and costs, at the rate of \$350.00 per hour for senior counsel with eleven or more years experience, \$300.00 per hour for counsel with nine to ten years experience, \$250 per hour for counsel with eight to nine years experience, \$190 for counsel with six to seven years experience, \$170 for counsel with four to five years experience, \$150 for counsel with up to three years experience and \$90 for law clerks and \$90 for paralegals.

At any time Client may request a resume of any attorney or attorneys assigned to work on Client's case.

Dated this 6th day of July, 2015.



Kim Davis
Rowan County Clerk, Client

Anita L. Staver, Esq., President
LIBERTY COUNSEL

LIBERTY COUNSEL
Contract of Legal Representation

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I, Kim Davis, Clerk of Rowan County, Kentucky, (hereinafter "Client"), above the age of eighteen, of sound mind and with full authority to enter into this Contract, do hereby retain Liberty Counsel to provide legal representation regarding the mandate for Kentucky county clerks to issue same-sex "marriage" licenses in the wake of *Obergefell v. Hodges*. Liberty Counsel will provide a defense against April Miller, Karen Ann Roberts, Shantel Burke, Stephen Napier, Jody Fernandez, Kevin Holloway, Aaron Skaggs, Barry Spartman, and/or any other additional opposing party or parties that may be later added in order to represent Client's claim and/or defense.

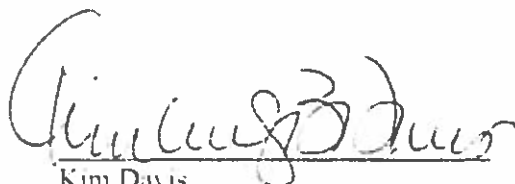
Liberty Counsel will provide legal representation outside of court, in a court of law, regulatory or administrative proceeding, including any appeals that Liberty Counsel deems advisable, by employing or associating with any attorney or law firm of its choice to assist in the representation of any matter at any time in the legal proceedings. Client agrees to be truthful at all times and reveal all information necessary and relevant to Client's case and shall fully cooperate in all legal proceedings.

Client understands that Liberty Counsel will request the court or administrative body to award attorney's fees and costs to be paid by the opposing party or parties in order to compensate Liberty Counsel, and any attorney or law firm working with or on behalf of Liberty Counsel, for attorney time, staff time, and costs expended with respect to the representation of Client. Client agrees to fully cooperate with Liberty Counsel with respect to any claim made by Liberty Counsel for the recovery of attorney's fees and costs against the opposing party or parties. Client also agrees and understands that any attorney's fees and costs recovered by Liberty Counsel from the opposing party or parties shall be paid directly to Liberty Counsel. If the opposing party or parties pays the amount for attorney's fees and costs directly to Client, Client agrees to immediately endorse the check payable to Liberty Counsel.


If Client terminates this Contract without the express written consent of Liberty Counsel's President, or if Client retains any other attorney or organization to provide legal representation, or retains any other attorney or organization as co-counsel without the express written consent of Liberty Counsel's President, Client understands and hereby acknowledges that Client shall be responsible for payment of attorney's fees and costs, at the rate of \$350.00 per hour for senior counsel with eleven or more years experience, \$300.00 per hour for counsel with nine to ten years experience, \$250 per hour for counsel with eight to nine years experience, \$190 for counsel with six to seven years experience, \$170 for counsel with four to five years experience, \$150 for counsel with up to three years experience and \$90 for law clerks and \$90 for paralegals.

At any time Client may request a resume of any attorney or attorneys assigned to work on Client's case.

Dated this 1st day of July, 2015.



Kim Davis
Rowan County Clerk, Client



Digitally signed by Anita Staver
DN: cn=Anita Staver, o=Liberty
Counsel, ou,
email=astaver@LC.org, c=US
Date: 2015.07.06 13:11:41 -0400

Anita L. Staver, Esq., President
LIBERTY COUNSEL

Davis, Kimberly (Rowan County Clerk)

From: Davis, Kimberly (Rowan County Clerk)
Sent: Friday, August 14, 2015 10:42 AM
To: fgannam@jc.org; Jon Christman
Subject: compaint
Attachments: DOC.PDF

From: KimberlyB.Davis@ky.gov [KimberlyB.Davis@ky.gov]
Sent: Friday, August 14, 2015 11:36 AM
To: Davis, Kimberly (Rowan County Clerk)
Subject: Scan from a Xerox WorkCentre

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre.

Attachment File Type: PDF

WorkCentre Location: Rowan County Clerk
Device Name: XRX0000AAF305F5

For more information on Xerox products and solutions, please visit <http://www.xerox.com>

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ADC-315.1 Rev. 4-01 Page 1 of 1 Commonwealth of Kentucky Court of Justice RCr 2.02	Doc. Code: COM 02/16/2010 09:13 am Ver. 1.01		Case No. _____ Court <u>DISTRICT</u> County <u>ROWAN</u>
CRIMINAL COMPLAINT			

COMMONWEALTH OF KENTUCKY PLAINTIFF

V. DEFENDANT

Name: KIM DAVIS (Rowan County Clerk)

Address (if known):
 Rowan County Courthouse
 600 West Main Street
 Morehead, Kentucky 40351-1887

The Affiant Uriah Marquis Pasha #092028, whose address is:
 (Print or Type Name of Person Making Complaint)

Kentucky State Reformatory

 3001 West Highway 146
 LaGrange, Kentucky 40032

says that on June, 2015, in Rowan County, Kentucky, the above-named defendant unlawfully
 against the peace and dignity of the Commonwealth of Kentucky
 violated the peace by committing the Offense of Official Misconduct as defined by Kentucky Revised Statutes 522.030.

Affiant's grounds of belief as to the commission of this offense are: In June 2015, the Defendant issued an order to all Rowan County Deputy Clerks, which directed them to refrain from performing the duty imposed on all Commonwealth Of Kentucky County Clerks by the legislature to issue Marriage Licenses pursuant to Kentucky Revised Statutes Chapter 402. The Defendant willfully violated said statute to deprive United States Citizens their Constitutional right to happiness. At least two (2) one-man and one-woman couples were denied the right to a Marriage License.

Date: _____, 2015 Signature of Affiant: Uriah Marquis Pasha

Subscribed and sworn to before me by <u>Uriah Marquis Pasha</u> this <u>10th</u> day of <u>August</u> , <u>2015</u> My commission expires: <u>Aug. 5</u> , <u>2017</u>	<u>Jarvis J. J. J. J. J.</u> 494516 Circuit Clerk (Notary)
By: _____ D.C.	

FW: Federal Courts Corrupt and Illegal Redefinition of Marriage

Davis, Kimberly (Rowan County Clerk)

Sent: Friday, August 28, 2015 8:25 AM

To: Jon Christman [jchristman@lc.org]; rgannam@lc.org

interesting stuff

From: Harry Wolfenbarger [graneroscowboy@yahoo.com]**Sent:** Thursday, August 27, 2015 5:00 PM**To:** Davis, Kimberly (Rowan County Clerk)**Subject:** Federal Courts Corrupt and Illegal Redefinition of Marriage

August 27, 2015

Rowan County Clerk

Kim Davis

600 West Main Street

Room 102

Morehead, KY 40351

kimberlyb.davis@ky.gov

Dear Kim Davis:

You are right to refuse ass the Federal Government had no legal authority to overturn your State Ban on Gay Marriage, as it was a decision of the People and not one made by the State of Kentucky.

Please read all of the following very carefully as it explains just how corrupt the decision made by the Federal Courts was and is:

The rights of the People pursuant to the 9th Amendment[Ratified in 1791] to the United States Constitution[Including yourself] to amend their State's Constitution have been completely ignored/trampled into the ground by the Federal Courts, in a deliberate attempt to make the will of the People and the sovereign States subject to the Federal Government---that the sovereign States created in 1787.

Said Amcndment <http://constitutionus.com/> gives the People all authority and powers, not delegated to the United States[Federal Government], which are many and unlimited. The Powers[Article I, Section 8,

Clauses 1-18] delegated to the United States[Federal Government] are very few and enumerated[So that the United States[Federal Government] could manage the external affairs[outside of a State's borders] and common defense of the several sovereign Nations[States]--- not their internal affairs[within a State's borders].

The Tenth Amendment <http://constitutionus.com/> was ratified to grant sovereign Nations[States] many and unlimited powers also---but were to be shared with the People.

Thus we have the following:

The Federalist No. 51 <http://www.constitution.org/fed/federa51.htm>

First: In a single Republic all the power surrendered by the People is submitted to the administration of a single government; and the usurpations are guarded against by a division of the government into distinct and separate departments. In the compound republic of America, the power surrendered by the People is first divided between two distinct governments, and then the portion allotted to each subdivided among distinct and separate departments. Hence a double security arises to the rights of the People. The different governments will control each other, at the same time that each will be controlled by itself.

New York v. United States (91-543), 488 U.S. 1041 (1992)

<https://www.law.cornell.edu/supct/html/912-543.ZO.html>

*The Constitution does not protect the sovereignty of States for the benefit of States or State governments as abstract political entities, or even for the benefit of the public officials governing the States. To the contrary, the Constitution divides authority between federal and state governments for the protection of individuals. State sovereignty is not just an end in itself: "Rather federalism secures to citizens the liberties that derive from the diffusion of sovereign power." *Coleman v Thompson*, 501 U.S. __, __ (1991) (slip op., at 2)(Blackmun, J., dissenting). "just as the separation and independence of the coordinate Branches of the Federal Government serves to prevent the accumulation of excessive power in any one Branch, a healthy balance of power between the States and the Federal Government will reduce the risk of tyranny and abuse from either front." *Gregory v Ashcroft*, 501 U.S., at __ (1991) (slip op., at 4). See *Federalist No. 51*, p. 323.*

The People did not just surrender powers to the "States" or the "Federal Government", instead they created Contracts[known as Constitutions] that defined the powers being surrendered to each entity and how they were to be used. In these Contracts[Constitutions] provision was made to allow said Contract[Constitution] to be amended, but only pursuant to the conditions specified in said Contracts[Constitutions].

1. In State Constitutions approval of the majority of citizens residing in said State must be obtained.

2. In the Federal Constitution approval of the majority of the sovereign States must be obtained.

Any modification or repeal of such an Amendment can only be carried out pursuant to the provisions of said Contracts[Constitutions] as none of the Contracts[Constitutions] provide any Court[State or Federal] that power/authority.

The first mistake made by the lower Federal Courts is that they took the liberty of reclassifying Amendments to State Constitutions as laws so that they could then declare them unconstitutional pursuant to the 14th Amendment to the U.S. Constitution---thereby disenfranchising all citizens who voted for or against said Amendments.

<http://constitutionus.com/>.

A law is passed by a legislature and then signed by the executive branch. It is not put before the majority of the State's citizens, or before the majority of the sovereign States for their approval!!! Ex. Loving v Virginia <http://caselaw.findlaw.com/us-supreme-court/388/1.html>

The U.S. Constitution does not grant to the Federal Government jurisdiction/control over any land within the borders of the "Union" known as the United States of America.

Instead Article I, Section 8, Clause 17 requires said Federal Government to obtain the consent of the legislature of a State in order to purchase and exercise jurisdiction over any land within that State. Therefore, at this time the Federal Government only has jurisdiction over Washington D.C., The Federal Enclaves within the several sovereign States and U.S. foreign possessions!!!

As Chief Justice Marshall observed in U.S. v Bevens, 16 U.S. 336 (1818)

<http://laws.findlaw.com/us/16/336.html>

Excerpts:

Whatever may be the constitutional power of congress, it is clear that this power had not been so exercised, in this section of the act, as to confer on its courts jurisdiction over any offence committed in a river, haven, basin. Or bay; which river, haven, basin, or bay is within the jurisdiction of any particular State.

What then is the extent of jurisdiction which a State possesses?

We answer, without hesitation, the jurisdiction of [16 U.S. 336, 337] a State is co-extensive with its territory; co-extensive with its legislative power.

But in construing the act of Congress, the Court believes it to be unnecessary to pursue the investigation which has been so well made at the bar respecting the jurisdiction of these rival courts [STATE & UNION (FEDERAL)].

To bring the offense within the jurisdiction of the courts of the union, it must have been committed in a river, &c. out of the jurisdiction of any state. It is not the offence committed, but the bay in which it is committed, which must be out of the jurisdiction [16 U.S. 336, 338] of the state. If, then it should be true that Massachusetts can take no cognizance of the offence; yet, unless the place itself is out of her jurisdiction, congress has not given cognizance of that offence to its courts. If there be a common jurisdiction, the crime cannot be punished in the courts of the union.

This is a question on which the court is incapable of feeling a doubt. The article which describes the judicial power of the United States is not intended for the cession of territory or of general jurisdiction. It is obviously designed for other purposes. It is in the 8th section of the 2nd (Correction-1st) article, we are to look for cessions of territory and of exclusive jurisdiction over this district, over all places purchased by the consent of the legislature of the state in which the same shall be, for the erection of forts, magazines, arsenals, dock yards, and other needful buildings

It is observable, that the power of exclusive legislation (which is jurisdiction) is united with the session of territory, which is to be the free act of the states. It is difficult to compare the two sections together, without feeling a conviction, not to be strengthened by any commentary on them, that, in describing the judicial power, the framers of our constitution had not in view any cession of territory, or, which is essentially the same, of general jurisdiction.

Commonwealth v. Young, Brightly, N.P. 302, 309 (Pa. 1818)

Excerpt:

"The legislation and authority of congress is confined to cessions by particular states for the seat of government, and purchases made by consent of the legislature of the state, for the purpose of erecting forts. The legislative power and exclusive jurisdiction remained in the several states, of all territory within their limits, not ceded to, or purchased by, congress, with the assent of the state legislature, to prevent the collision of legislation and authority between the United States[Federal government] and the several states."

In 1836 the U.S. Supreme Court was again presented with a case involving the distinction between State and federal jurisdiction. In *New Orleans v. United States*, 35 U.S. (10 Pet.) 662, 737 (1836)

<http://laws.findlaw.com/us/35/662.html>, the United States claimed title to property in New Orleans likewise claimed by the city. After holding that title to the subject lands was owned by the city, the Court addressed the question of federal jurisdiction and stated:

"Special provision is made in the Constitution for the cession of jurisdiction from the States over places where the federal government shall establish forts or other military works. And it is only in these places, or in the territories of the United States, where it can exercise a general jurisdiction."

In *New York v. Miln*, 36 U.S. (11 Pet.) 102 (1837) <http://laws.findlaw.com/us/36/102.html>, the question before the Court involved the attempt by the City of New York to assess penalties against the master of a ship for his failure to make a report as to the persons his ship brought to New York. As against the master's contention that the act was unconstitutional and that New York had no jurisdiction in the matter, the Court held:

"If we look at the place of its operation, we find it to be within the territory, and, therefore, within the jurisdiction of New York. If we look at the person on whom it operates, he is found within the same territory and jurisdiction," 36 U.S., at 133.

"They are these: that a State has the same undeniable and unlimited jurisdiction over all persons and things within its territorial limits, as any foreign nation, where that jurisdiction is not surrendered or restrained by the Constitution of the United States. That, by virtue of this, it is not only the right, but the bounden and solemn duty of a State, to advance the safety, happiness and prosperity of its people, and to provide for its general welfare, by any and every act of legislation which it may deem to be conducive to these ends; where the power over the particular subject, or the manner of its exercise is not surrendered or restrained, in the manner just stated. That all those powers which relate to merely municipal legislation, or what may, perhaps, more properly be called internal police, are not thus surrendered or restrained; and that, consequently, in relation to these, the authority of a State is complete, unqualified and exclusive," 36 U.S., at 139.

The second mistake of the lower federal courts was to assume jurisdiction within the borders of sovereign States

as STATE CONSTITUTIONAL AMENDMENTS have no force or effect outside of the borders of any sovereign State, therefore removing them from review by the Courts of the Union[Federal Courts] which only have jurisdiction outside of a sovereign State's borders!!! There is no provision in Article V <http://constitutionus.com/> giving the Federal Courts the right to hear Issues/Cases that remain solely and completely within a sovereign State's borders. *The People have never surrendered their right to define Marriage pursuant to the 9th Amendment[Ratified in 1791 by the States] which precedes the 14th Amendment and has never been modified by any of the Amendments to the U.S. Constitution that that were ratified after said Amendment was approved in 1791!!!!*

The third mistake of the lower Federal courts was in not recognizing the fact that the sovereign States and the non-sovereign Federal government are two separate forms of government(with separate Constitutions)---each with its own sphere of influence and authority--- and that when a State's legislature proposes an Amendment to its Constitution, that it is doing the same as the U.S. Congress does when it proposes an Amendment to the U.S. Constitution. In neither case---once ratified(by the People or the States)---can said Amendments be referred to as "Laws"!!! Both State and Federal Legislatures rely upon the time tested "The Majority Rules" that is the basic tenet for all government decisions both State and Federal. The only way for any such Amendment to be overturned is for either of the Legislatures[State or Federal] to propose another Amendment that would modify or repeal the original Amendment---once ratified by either the People or the States!!

Further, they deliberately ignored the tenet: Of the People, by the People, and for the People, and instead decided to create a new one: of the Federal Government, by the Federal Government, and for the Federal Government.

The fourth mistake of the lower courts was to assume that federal laws override state laws whenever they collide---ignoring the fact that said governments are separate entities that do not have the power to tell each other, or their officials[*Printz vs United States 521 U.S. 898(1997)* <http://www.law.Cornell.edu/supct/html/95-14787.ZO.html>] , what to do:

In Article VI, Clause 2

<http://constitutionus.com/>

This Constitution and the laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the authority of the United States, shall be the supreme Law of the land; and the Judges in every state shall be bound thereby, any Thing in the Constitution or Laws of any state to the Contrary notwithstanding.

Thus only laws created pursuant to Article I, Section 8, Clauses 1-18---which is the "Authority of the United States" becomes the "Supreme Law of the Land", and any law not created pursuant to said authority is and cannot be the "Supreme Law of the Land". State law than prevails over Federal law!!!!

Because the several States are sovereign and therefore have equal power and authority no State has the right to tell another one what, or how, to manage its internal affairs---nor do the citizens of any one state have the right to disobey the Constitution/laws of any other State that they may enter, travel through, or choose to change their legal residence too.

Our forefathers knew that by specifically limiting the "United States"[Federal Government] to a very few powers would make it a very weak and feeble government in regards to the People and the several sovereign States[With many and unlimited powers], but very strong when managing Foreign Affairs and the Common Defense, as the U.S. Constitution requires said Federal Government to do, thus insuring Liberty and Freedom to all citizens and the several sovereign States from the tyranny of an all powerful Federal Government/ the invasion of foreign Countries!!!

Sincerely,

Harry Wolfenbarger Jr.

Disenfranchised Voter and citizen

906 Avenue B

Dodge City, KS 67801-5001

620 227-2237

FW: Hi Kim - CBS

Davis, Kimberly (Rowan County Clerk)

Sent: Friday, August 28, 2015 8:32 AM

To: Jon Christman [jchristman@lc.org]; rgannam@lc.org

Importance: High

From: Hoenemeyer, Lauren [HoenemeyerL@cbsnews.com]**Sent:** Thursday, August 27, 2015 3:59 PM**To:** Davis, Kimberly (Rowan County Clerk)**Subject:** Hi Kim - CBS

Hi Kim,

Lauren Hoenemeyer here reaching out from CBS National News. I know there have been a lot of unfair and misleading reports in the media about you lately, and I wanted to give you the opportunity to speak the truth and share your thoughts to stop all the rumors once-and-for-all.

CBS National News is dedicated to fair and accurate reporting, so I wanted to let you know that we'd love to chat with you and get to know you for an interview where we can share your personal story on your own terms. When you have a moment, can you give me a quick call at 702-610-1665? Our conversation will be completely off the record, I would just like to introduce myself to let you know that CBS is the most trustworthy. I'd be honored to hear from you.

Thanks so much and I look forward to hearing from you!

Best,

Lauren Hoenemeyer
CBS National News
CBS This Morning
Associate Producer
lauren@cbsnews.com
702-610-1665

Davis, Kimberly (Rowan County Clerk)

From: Davis, Kimberly (Rowan County Clerk)
Sent: Monday, August 31, 2015 9:19 AM
To: Jon.Christman@rgannam@ic.org
Subject: FW: Your Voice, Your Story in the Written Word

From: Andy Adkins [agadkins@moreheadstate.edu]
Sent: Sunday, August 30, 2015 5:08 PM
To: Davis, Kimberly (Rowan County Clerk)
Subject: Your Voice, Your Story in the Written Word

Hello mam,

A select few people in world history have stood fast in their beliefs and values the way you have these past few months.

I'm sure you've opened hundreds of emails requesting interviews. You've woken up to messages full of vulgarity and hate. But you've received words of support from across the country, too. I'm a freelance reporter for the Ashland Daily Independent. When I journeyed to the Capitol last Saturday, I saw thousands of those supportive people. They spent their Saturday rallying for you. And that was only a sample of a significant number of people who feel the same way.

I've been assigned to write a feature story about you. I want to tell the paper's readership in Kentucky who you are and why you've stuck to your beliefs. Because that's the real story.

Some media have portrayed you as some sort of "villain." That's not reality. From what I've gathered, you and your family are important people in the history of this community. You've been re-elected county clerk several times. That means you're exceptional in the eyes of the majority of Rowan County.

I prefaced my interview request with this information to let you know that I'm writing this story about Kim Davis, the Rowan County Clerk. I'm not writing about a conflict or a clash. This story is about who you are and your stand for what you believe in.

I'm also a native of eastern Kentucky and a senior at Morehead State. At your leisure, could I come by your office this week to speak with you?

Thank you Kim,

-Andrew Adkins

Davis, Kimberly (Rowan County Clerk)

From: Davis, Kimberly (Rowan County Clerk)
Sent: Monday, August 31, 2015 9:22 AM
To: Jon Christman; rgannam@lc.org
Subject: FW: CNN - National morning show request

Importance: High

From: Rose, Jacqueline [Jacqueline.Rose@turner.com]
Sent: Sunday, August 30, 2015 7:08 PM
To: Davis, Kimberly (Rowan County Clerk)
Subject: CNN - National morning show request

Hello Ms. Davis,

My name is Jacqueline Rose, I'm a producer with CNN's national morning show *NEW DAY* hosted by Chris Cuomo and Alisyn Camerota: <http://www.cnn.com/shows/new-day>

I'm reaching out because we would like to schedule an interview with you Ms. Davis, regarding your decision to refuse marriage licenses for same-sex couples.

This is obviously an issue you feel very strongly about and I read how much thought has gone into your decision. We would welcome you on our program, with your lawyer Mr. Gannam, to speak about why this is so important to you that you are standing up for what you believe is right and risking your livelihood in doing so.

I could arrange any logistics you would need for this interview. We air from 6-9 am EST Monday through Friday. If timing is an issue, we could always tape an interview around 9:10 am EST after our show ends and it would air the next day on *New Day* and across all CNN platforms, domestic and international.

Thank you for your time in reading this request Ms. Davis. I'm happy to answer any questions either of you may have. My cell is 716.912.1224.

Warm regards,

Jacqueline Rose

Associate Editorial Producer, *New Day* - CNN

1 Time Warner Center, 4th Floor

New York, N.Y. 10019

Office: 212.275.8208

Cell: 347.802.6424

Jacqueline.Rose@turner.com



Davis, Kimberly (Rowan County Clerk)

From: Davis, Kimberly (Rowan County Clerk)
Sent: Monday, August 31, 2015 9:23 AM
To: Jon Christman; rgannam@ic.org
Subject: FW: Question from NBC News

From: Kennedy, Meredith (NBCUniversal) [meredith.kennedy@nbcuni.com]
Sent: Sunday, August 30, 2015 3:41 PM
To: Davis, Kimberly (Rowan County Clerk)
Subject: Question from NBC News

Hi Ms. Davis,

Meredith here from NBC News in New York. I wanted to touch base with you regarding your decision to deny licenses to same-sex couples. I have reached out to your attorney Mr. Christman and haven't heard back, so I wanted to connect with you too. We are going to be discussing this tomorrow morning on the TODAY Show and would like to make sure your voice is heard. Could you or Mr. Christman give me a call as soon as possible to discuss? I can be reached on my cell at 347-802-6116.

Many thanks,
Meredith

Meredith Kennedy
NBC News | TODAY
(O) 212-664-3107
(C) 347-802-6116
meredith.kennedy@nbcuni.com

RE: CNN - National morning show request

Roger Gannam [rgannam@lc.org]

Sent: Monday, August 31, 2015 10:01 AM

To: Davis, Kimberly (Rowan County Clerk); Jon Christman [jchristman@lc.org]

Kim, I guess these are rolling in pretty regularly now. Cuomo on CNN is a crackpot.

We'll continue to absorb the media requests. Please continue to send them.

I hope you are having a peaceful day. We are in prayer throughout the day for positive developments.

In Christ, Roger

Roger K. Gannam, Esq.
Senior Litigation Counsel
Liberty Counsel

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From: Davis, Kimberly (Rowan County Clerk) [mailto:KimberlyB.Davis@ky.gov]
Sent: Monday, August 31, 2015 9:22 AM
To: Jon Christman <jchristman@lc.org>; Roger Gannam <rgannam@lc.org>
Subject: FW: CNN - National morning show request
Importance: High

From: Rose, Jacqueline [Jacqueline.Rose@turner.com]
Sent: Sunday, August 30, 2015 7:08 PM
To: Davis, Kimberly (Rowan County Clerk)
Subject: CNN - National morning show request

Hello Ms. Davis,

My name is Jacqueline Rose, I'm a producer with CNN's national morning show **NEW DAY** hosted by Chris Cuomo and Alisyn Camerota: <http://www.cnn.com/shows/new-day>

I'm reaching out because we would like to schedule an interview with you Ms. Davis, regarding your decision to refuse marriage licenses for same-sex couples.

This is obviously an issue you feel very strongly about and I read how much thought has gone into your decision. We would welcome you on our program, with your lawyer Mr. Gannam, to speak about why this is so important to you that you are standing up for what you believe is right and risking your livelihood in doing so.

I could arrange any logistics you would need for this interview. We air from 6-9 am EST Monday through Friday. If timing is an issue, we could always tape an interview around 9:10 am EST after our show ends and it would air the next day on New Day and across all CNN platforms, domestic and international.

Thank you for your time in reading this request Ms. Davis. I'm happy to answer any questions either of you may have. My cell is 716.912.1224.

Warm regards,

Jacqueline Rose

Associate Editorial Producer, *New Day* - CNN

1 Time Warner Center, 4th Floor

New York, N.Y. 10019

Office: 212.275.8208

Cell: 347.802.6424

Jacqueline.Rose@turner.com



Davis, Kimberly (Rowan County Clerk)

From: Davis, Kimberly (Rowan County Clerk)
Sent: Tuesday, October 20, 2015 8:06 AM
To: mat@ic.org
Subject: FW: Inquiry from The Yomiuri Shimbun (Japan's largest daily newspaper)

From: varaki24@gmail.com [<mailto:varaki24@gmail.com>] On Behalf Of Yumi Araki
Sent: Monday, October 19, 2015 5:34 PM
To: Davis, Kimberly (Rowan County Clerk)
Subject: Inquiry from The Yomiuri Shimbun (Japan's largest daily newspaper)

Dear Mrs. Davis:

I hope this message finds you well. This is Yumi Araki, a reporter with the Washington D.C. bureau of *The Yomiuri Shimbun*, Japan's largest daily newspaper with a circulation of over 10 million. I am reaching out because we are writing a feature story highlighting some of the major social and political concerns Americans harbor as part of our series leading up to the 2016 presidential election. I know your story has been featured in countless American media outlets (perhaps, quite unsolicited), but I would really love to give our Japanese readers a chance to viscerally understand the concerns Americans harbor about religious rights and marriage equality.

Nobody has articulated and manifested the fight for religious freedom more than you have, and for that, we would love the opportunity to fly out to Kentucky to interview you in person. We would like for you to help describe to our Japanese readers what motivated you to protest for your rights and values--I think this angle of the story is often lost in other news reports. If you could kindly let me know your availability for the next two weeks so we may be able to arrange an interview time, I would deeply appreciate it.

Thank you very much for your time amid what is probably a period of tumult, and I look forward to hearing from you.

All the best,
Yumi

--
Washington Reporter
The Yomiuri Shimbun
General Bureau of the Americas
Suite 802 National Press Building
529 14th St. NW Washington, DC 20045
Tel: 202-661-8196
Cell: 857-383-8349
www.yomiuri.co.jp
<http://the-japan-news.com/>

Davis, Kimberly (Rowan County Clerk)

From: Davis, Kimberly (Rowan County Clerk)
Sent: Tuesday, October 20, 2015 3:39 PM
To: emat@ic.org
Subject: FW: GQ magazine fact-checking request

From: Benjamin Phelan [<mailto:phelan.ben@gmail.com>]
Sent: Tuesday, October 20, 2015 3:02 PM
To: Davis, Kimberly (Rowan County Clerk)
Subject: GQ magazine fact-checking request

Ms Davis--I'm getting in touch because I'm fact-checking an article for GQ magazine in which one of our writers interviewed David Moore and David Ermold. Do you have time for a brief phone call? I'd like to verify a few factual details--shouldn't take more than five or ten minutes.

Call at your next convenience. I can be reached at 502 635 8401.

Best,
Ben

10/20/15

Re: GQ magazine fact-checking request

Mat Staver [mat@lc.org]

Sent: Tuesday, October 20, 2015 4:31 PM

To: Davis, Kimberly (Rowan County Clerk)

I will respond.

Mat Staver, Esq.

On Oct 20, 2015, at 3:39 PM, Davis, Kimberly (Rowan County Clerk) <KimberlyB.Davis@ky.gov> wrote:

From: Benjamin Phelan [<mailto:phelan.ben@gmail.com>]

Sent: Tuesday, October 20, 2015 3:02 PM

To: Davis, Kimberly (Rowan County Clerk)

Subject: GQ magazine fact-checking request

Ms Davis--I'm getting in touch because I'm fact-checking an article for GQ magazine in which one of our writers interviewed David Moore and David Ermold. Do you have time for a brief phone call? I'd like to verify a few factual details--shouldn't take more than five or ten minutes.

Call at your next convenience. I can be reached at 502 635 8401.

Best,
Ben

Davis, Kimberly (Rowan County Clerk)

From: Davis, Kimberly (Rowan County Clerk)
Sent: Friday, January 08, 2016 2:29 PM
To: mat@lc.org
Subject: FW: College assignment

From: Jeremy Lechuga [<mailto:lechugaic@gmail.com>]
Sent: Thursday, January 07, 2016 8:28 PM
To: Davis, Kimberly (Rowan County Clerk)
Subject: College assignment

Good Evening Mrs. Davis

My name is Jeremy Lechuga and I am currently in San Diego California attending National University. We were recently assigned a paper to defend a current event where someones ethics were questioned, and I chose to defend you. A little bit about myself, I am originally from Nevada and recently separated from the Marine Corps after ten years of service. I share the same beliefs as you do and for this paper we were tasked with reaching out to the person we are defending or someone close to the situation. A short statement or if you can answer some questions that would be wonderful. Any help or guidance is appreciated. Thank you and god bless.