

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.

**DECLARATION OF RYAN GERMANY IN SUPPORT OF PLAINTIFF'S  
EMERGENCY MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Ryan Germany, make the following  
declaration:

1. I am a licensed attorney in the State of Georgia, over the age of 21,  
and I am under no legal disability which would prevent me from giving this

declaration. If called to testify, I would testify under oath to these facts.

2. I am Executive Director of Plaintiff Safe Affordable Georgia, Inc.

3. I registered Safe Affordable Georgia with the State Ethics Commission as an Independent Committee on November 13, 2025, and as a Political Action Committee on November 21, 2025. A true and accurate copy of Safe Affordable Georgia's registrations are attached hereto as Exhibit A.

4. Safe Affordable Georgia is chaired by Brad Raffensperger, the current Georgia Secretary of State and candidate in the 2026 Republican primary for governor.

5. The multicandidate field in the Republican primary includes Burt Jones, the sitting Lieutenant Governor. Mr. Jones has designated WBJ Leadership Committee, Inc. ("WBJ"), which is registered as his leadership committee with the Georgia State Ethics Commission.

6. In its most recent filing with the SEC, WBJ disclosed over \$14 million cash on hand, all of which is available to be spent in support of his primary campaign. WBJ's June 30, 2025 Campaign Contribution Disclosure Report on file with the SEC is subject to judicial notice, available at <http://bit.ly/3KvUjdt>, and attached hereto as Exhibit B.

7. Even if a competing candidate chairs a hybrid PAC, it cannot solicit contributions for the candidate or coordinate expenditures with the campaign or the candidate.

8. Safe Affordable Georgia desires to coordinate with Raffensperger, his campaign for governor, and other candidates and campaign committees to the same extent WBJ can coordinate with Jones and other candidates and campaign committees.

9. Safe Affordable Georgia intends, once the challenged restrictions are enjoined, to accept above-limit contributions from Raffensperger and others, and coordinate the expenditure of those funds with campaign committees to advance the election prospects of the supported candidates.

10. However, Safe Affordable Georgia refrains from soliciting contributions for coordination purposes, and from coordinating with candidates and campaign committees, including Raffensperger and his campaign committee, Brad for Governor, Inc, on account of the coordinated spending limits Georgia places on hybrid PACs through O.C.G.A. § 21-5-30(a)'s bar on a hybrid PAC accepting contributions made to bring about the nomination or election of a candidate for any office; and O.C.G.A. § 21-5-41's bar on a hybrid PAC coordinating its expenditures with campaign committees.

11. Safe Affordable Georgia does not seek to restrict the ability of WBJ to coordinate. it only seeks the lifting of restrictions on Safe Affordable Georgia to be on equal footing with WBJ.

12. Emergency treatment of this motion is warranted because each day that the laws remain in effect constitute a new and cumulative injury to

Safe Affordable Georgia. With the primary election approaching in May, delay in enjoining these laws will be irreparable and extremely prejudicial to fair elections in Georgia.

I declare under penalty of perjury that the foregoing is true and correct.

  
RYAN GERMANY  
Executive Director  
Safe Affordable Georgia, Inc.