



Exhibit
A

SHEENA HAMILTON
CITY COUNSELOR

CITY OF ST. LOUIS
LAW DEPARTMENT
1200 MARKET STREET, ROOM 314
ST. LOUIS, MO 63103-2864
(314) 622-3361

TISHAURA O. JONES
MAYOR

March 13, 2023

VIA EMAIL

Missouri Attorney General's Office
c/o William M. Corrigan, Jr., Deputy Attorney General
william.corrigan@ago.mo.gov
221 West High Street
Jefferson City, Missouri 65101

RE: Gardner Quo Warranto – Subpoena Responses
State of Missouri, et al. v. Kimberly M. Gardner, Case No. 2322-CC00383

Counsel,

I write to provide responses to subpoenas issued to the Honorable Tishaura O. Jones and the Honorable Darlene Green on March 2, 2023. I shared a document download including documents bates labeled STL00001-019627.¹ The links will expire in seven days, i.e., on March 20, 2023.

Certain of the responsive documents were withheld on the basis of the attorney-client privilege and/or the work product doctrine. Status updates regarding employee vaccinations in the City were withheld based on the Health Insurance Portability and Accountability Act. Documents produced were deduplicated by the eDiscovery software utilized by the City Counselor's Office. As such, several documents may show only Mayor Jones as a custodian where both Mayor Jones and Comptroller Green received a particular piece of correspondence – and vice versa.

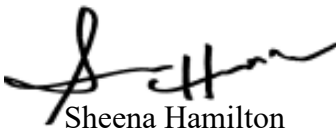
¹ Neither Mayor Jones nor Comptroller Green intentionally waived any privilege with this production and both reserve the right to claw back any document inadvertently produced upon discovery of inadvertent disclosure.

Further, based on the broad nature of the subpoenas issued, namely the language “about or concerning Kimberly Gardner,” and the timeline, several documents are being produced without defensible relevance objections. For that reason, and in an effort to comply with the subpoenas as written, many of the documents produced have no logical or legal relationship to the allegations contained in the State’s Quo Warranto Petition.

Finally, you will notice redactions to some of the documents based on the attorney-client privilege and based on items being outside the scope of the subpoena. For example, a particular text thread may only show portions of a text thread related to the Circuit Attorney or her office. Additionally, where a custodian did not possess text messages back to 2017, you will notice that text messages start in the 2019 timeframe.

Mayor Jones and Comptroller Green reserve the right to supplement this production.

Regards,



Sheena Hamilton
City Counselor

cc: Shaun Mackelprang, Deputy Attorney General (shaun.mackelprang@ago.mo.gov)
Gregory M. Goodwin, Chief Counsel – Public Safety (gregory.goodwin@ago.mo.gov)
Andrew Crane, Assistant Attorney General (andrew.clarke@ago.mo.gov)
Michael Downey, Downey Law Group (mdowney@downeylawgroup.com)
Paige Tungate, Downey Law Group (ptungate@downeylawgroup.com)