

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

GEORGIA CARRY.ORG, INC.,	)	
VIRGINIA CITIZENS DEFENSE	)	
LEAGUE, and	)	
ROBERT SADTLER,	)	
Plaintiffs,	)	
	)	Civil Action No.
v.	)	
	)	
CHRISTOPHER M. CARR, individually	)	
and in his official capacity as	)	
Attorney General	)	
Of the State of Georgia,	)	
Defendant	)	

VERIFIED COMPLAINT

Plaintiffs state the following as their Complaint:

1. This is a Complaint for mandamus and declaratory relief, seeking a declaration that Georgia law does not require another state to recognize **all** Georgia Weapons Carry Licenses (GWLs) issued pursuant to O.C.G.A. § 16-11-129 in order for Georgia to recognize **any** licenses issued by such other state.
2. Defendant is the Attorney General of the State of Georgia.
3. Plaintiff Robert Sadtler is a natural person who is a citizen of the United States and of the Commonwealth of Virginia.
4. Plaintiff GeorgiaCarry.Org, Inc. (“GCO”) is a non-profit corporation organized under the laws of Georgia.
5. The mission of GCO is to foster the rights of its members to keep and bear arms.
6. Plaintiff Virginia Citizens Defense League (“VCDL”) is a non-profit corporation organized under the laws of Virginia.

7. The mission of VCDL is to foster the rights of its members to keep and bear arms.
8. Sadtler is a member of GCO and VCDL.
9. Defendant's office maintains a list of states with which Georgia reciprocates for the carrying of handguns.
10. Law enforcement officers throughout the state rely upon this list to know what licenses to carry handguns issued by other states are recognized by Georgia.
11. In June of 2016, Asst. Atty. Gen. Rebecca Dobras of Defendant's Office exchanged a series of emails with Sgt. Thomas Lambert of the Virginia Department of State Police.
12. The subject of the emails was reciprocity between Georgia and Virginia for licenses to carry weapons issued by the two states.
13. Sgt. Lambert notified Ms. Dobras that effective July 1, 2016, Virginia would recognize, pursuant to Virginia law, Georgia weapons carry licenses ("GWLs") issued pursuant to O.C.G.A. § 16-11-129, but only for licensees 21 years of age or older.
14. Such recognition would have the effect of treating a GWL as a Virginia concealed handgun permit ("VCHP").
15. Ms. Dobras responded that Georgia would not recognize **any** VCHPs, on account of Virginia's refusal to recognize GWLs issued to people under the age of 21.
16. In July 2016, GCO challenged Ms. Dobras' position.
17. Ms. Dobras responded that Georgia will not recognize VCHPs unless Virginia recognizes **all** GWLs.
18. In August 2016, GCO raised the issue with Defendant's predecessor in Office, who referred GCO to his staff, ultimately Ms. Dobras.

19. After Defendant took Office on November 1, 2016, GCO asked Defendant's office if there were any change in the Office's position.
20. No change was reported.
21. Sadtler possesses a valid VCHP.
22. He is ineligible for a GWL because he is not a domiciliary of Georgia. O.C.G.A. § 16-11-129(a).
23. Georgia law generally prohibits carrying a handgun without a GWL, pursuant to O.C.G.A. § 16-11-126.
24. Sadtler has relatives in Georgia whom he would visit several times per year if, while in Georgia, he could keep and carry a handgun in case of confrontation.
25. Sadtler refrains from doing so, because he fears arrest and prosecution for doing so pursuant to O.C.G.A. § 16-11-126.
26. He would do so, however, if Defendant would include Virginia on the list of states with which Georgia has reciprocity.
27. Pursuant to O.C.G.A. § 16-11-126(e), Georgia recognizes licenses issued "in any other state whose laws recognize and give effect to a license issued" under Georgia law.
28. Virginia's laws recognize and give effect to a license issued under Georgia law.
29. Sadtler is entitled to reciprocity and recognition by Georgia of his VCHP.
30. Pursuant to O.C.G.A. § 16-11-173(b)(1)(B), Defendant is prohibited from regulating the carrying of firearms "in any manner."

31. VCDL has other members with VCHPs who would like to carry a handgun in Georgia but are in fear of arrest and prosecution on account of Defendant's position regarding reciprocity between Georgia and Virginia.

Count 1 – O.C.G.A. § 16-11-126(e)

32. By refusing to recognize VCHPs and not putting Virginia on the list of states with which Georgia reciprocates, Defendant is violating O.C.G.A. § 16-11-126(e).

33. Plaintiffs seek a writ of mandamus ordering Defendant to recognize VCHPs and to put Virginia on the list of states with which Georgia reciprocates. This relief is sought against Defendant personally.

Count 2 – O.C.G.A. § 16-11-173

34. By failing to recognize and give effect to VCHPs, Defendant is violating O.C.G.A. § 16-11-173(b)(1)(B), in that his refusal has the effect of regulating the carrying of firearms by people who are entitled to recognition by Georgia of their VCHPs.

35. Plaintiffs seek a declaration that persons who validly possess VCHPs are entitled to recognition of their VCHPs by Georgia. They also seek the expenses of this litigation and reasonable attorney's fees, pursuant to O.C.G.A. § 16-11-173(g). The relief sought in this Count is against Defendant individually and in his capacity as Attorney General of the State of Georgia.

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