



OFFICE OF THE ATTORNEY GENERAL
STATE OF ALABAMA
CONSUMER INTEREST DIVISION

DECEPTIVE TRADE PRACTICES ACT INVESTIGATION
SUBPOENA DUCES TECUM #26-0005

IN THE MATTER OF: Alabama Attorney General's Deceptive Trade Practices Act Investigation

TO: The Southern Poverty Law Center
Attn: Sybil Hadley, Registered Agent
400 Washington Avenue
Montgomery, Alabama 36104

FROM: Katherine Robertson
Chief Counsel, Deputy Attorney General
Office of the Alabama Attorney General
501 Washington Avenue
Montgomery, Alabama 36104

YOU ARE ORDERED TO APPEAR before the Alabama Attorney General on the below-listed date and time pursuant to the authority vested in the Attorney General by Section 8-19-9 of the Code of Alabama, with the below listed Documents, records, or responses to be produced:

DEFINITIONS

1. "Company" or "Companies" means the addressee/recipients of this subpoena, their parents, branches, departments, divisions, affiliates, subsidiaries, retail outlets, stores, franchises, successors, or predecessors, whether wholly owned or not, including, without limitation, any organization or entity in which said addressees have a management or controlling interest, together with all present and former officers, directors, agents, employees, sales people, brokers, representatives or anyone else acting or purporting to act, on behalf of the above-identified Persons or entities, or through which The Southern Poverty Law Center may have conducted business. The terms "You" and "Your" shall be synonymous with The Southern Poverty Law Center.
2. "Document" or "Documents" means all paper records and all electronically stored information, including the original and any non-identical copy (whether different from the original because of notations on such copy or otherwise, and including all draft versions of the original), of any written, recorded, or graphic matter, however produced or reproduced, including, but not limited to, all correspondence, communications (as defined below in Paragraph E), web pages, social media communications, photographs, contracts (including drafts, proposals, and any and all exhibits thereto), drafts, minutes and agendas, memoranda (including inter and intra-office memoranda, memoranda for file, pencil jottings, diary entries, desk calendar entries, reported recollections, and any other written

form of notation of events or intentions), transcripts and recordings of conversations and telephone calls, transcripts of testimony, audio and video media files, books of account, ledgers, publications, professional journals, invoices, financial statements, purchase orders, receipts, canceled checks and all other paper or electronic documentary material of any nature whatsoever, together with any attachments thereto or enclosures therewith.

3. The term “any” shall be construed as synonymous with “all” and shall be all-inclusive.
4. The connectives “and” and “or” shall be construed either disjunctively or conjunctively, whichever makes the request more inclusive.
5. “Communication” or “Communications” means any act, action, oral speech, written correspondence, contact, expression of words, thoughts, or ideas, or transmission or exchange of data or other information to another Person, whether orally, Person-to-Person, in a group, by telephone, letter, personal delivery, intercom, fax, e-mail, text message, social media, or any other process, electric, electronic or otherwise in any medium. All such Communications in writing shall include, without limitation, printed, typed, handwritten, or other readable documents.
6. “Financial Institution” means any bank, savings and loan institution, credit union, financial technology company, or any financial depository of any kind, including, but not limited to, any brokerage house, trustee, broker-dealer, escrow agent, title company, commodity trading company, or precious metal dealer.
7. “Person” means any individual and all entities, and, without limiting the generality of the foregoing, includes natural persons, employees, contractors, agents, consultants, vendors, telemarketers, consumers, customers, officers, directors, successors, assigns, joint owners, associations, partnerships, companies, joint ventures, corporations, affiliates, trusts, trustees, escrow agents and estates, and all groups or associations of persons.
8. “Related to” or “relating to” means in whole or in part constituting, containing, concerning, embodying, reflecting, discussing, describing, analyzing, identifying, stating, referring to, setting forth, dealing with, or in any way pertaining to.
9. “Informant” means an individual or entity that is or was part of your “informant program” as that term was used by You and Your interim president and CEO, Bryan Fair, in Your press release dated April 28, 2026.

INSTRUCTIONS

1. This Subpoena does not seek to obtain the personally identifying information of any private entity or Person whose relationship to The Southern Poverty Law Center is solely as a confidential or anonymous donor or member and whose identity as a donor or member has not been made public. The Southern Poverty Law Center may redact such personally identifying information in its response to this Subpoena.
2. This Subpoena is for the production of all responsive Documents and information in your possession, custody, or control regardless of whether such Documents or information is possessed directly by you or your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your attorneys or their agents, employees, representatives, or investigators.
3. Unless otherwise specified, original Documents must be produced, and the originals of electronic files must be produced in accordance with Paragraph 10 below. If your “original” is a photocopy, then the photocopy would be and should be produced as the original. Said copy shall be legible and bound or stapled in the same manner as the original.
4. The Documents to be produced pursuant to each request should be ***segregated and specifically identified*** to indicate clearly the particular numbered request to which they are responsive.
5. If any responsive Document or information cannot be produced in full, you are to produce it to the extent possible, indicating which Document, or portion of that Document, is being withheld, and the reason that Document, or portion of that Document, is being withheld.
6. If a Document once existed and has subsequently been lost, destroyed, or is otherwise missing, please provide sufficient information to identify the Document and state the details concerning its loss or destruction.
7. Documents not otherwise responsive to this Subpoena shall be produced if such Documents mention, discuss, refer to, or explain the Documents that are called for by this Subpoena, or if such Documents are attached to Documents called for by this Subpoena and constitute routing slips, transmittal memoranda, or letters, comments, evaluations, or similar materials.
8. If you do not possess, control, or have custody of any Documents responsive to any numbered request set forth below, ***state this fact by so specifying in your response to said request.***
9. The use of the singular form of a word includes the plural and vice versa. In addition, the use of any tense of any verb includes all other tenses of the verb.

10. Electronically Stored Information (ESI) is to be produced in the form in which it is ordinarily maintained. For example, native files would include email, spreadsheets and word processing files. Responsive Documents that exist in electronic format shall be provided in native format (*e.g.*, Microsoft Word files (.doc) or Outlook emails (.pst), spreadsheets and word processing documents) with standard metadata intact, as outlined below. Prior to any production of responsive data from a structured database (*e.g.*, Oracle, SAP, SQL, MySQL, QuickBooks, etc.), the producing party shall first provide the database dictionary and a list of all reports that can be generated from the structured database. The list of reports shall be provided in native Excel (.xls) format. The database format will be requested for production after both parties agree on the format. Please include sufficient identification of the applicable software program to permit access to, and use of, each Document. All attachments must be linked to their electronic Documents. Native files should be provided in directories which are identifiable as responsive to a specific Document request. All Documents produced in native form should be produced on CDROM, DVDROM, External USB, or other similar drive media of a type that can be read by any standard computer. Unless otherwise agreed to, standard metadata in electronically stored information shall be preserved and produced, such as: Custodian, To, From, CC, BCC, Dates and Times (Sent, Received and Modified), Attachments, Links, and Document types. A more complete list can be provided upon request. Questions regarding electronic production should be directed to the Assistant Attorney General whose name appears on this Subpoena. Arrangements will be made for the communication with the appropriate in-house technical expert.
11. If you claim any Document is protected from disclosure by the attorney-client privilege, work-product privilege, or any other privilege, provide a detailed privilege log that contains at least the following information for each Document that you have withheld:
- a. The name of each author, writer, sender, or initiator of such Document or thing, if any;
 - b. The name of each recipient, addressee, or party for whom such Document or thing was intended, if any;
 - c. The date of such Document, if any, or an estimate thereof so indicated if no date appears on the Document;
 - d. The general subject-matter as described on such Document; if no such description appears, then such other description sufficient to identify said Document; and
 - e. The claimed grounds for withholding the Document, including, but not limited to, the nature of any claimed privilege and grounds in support thereof.

12. All Document destruction or retention policies and practices and electronic file deletion or disk management policies and practices (including, but not limited to, reformatting practices) that could have the effect of altering or deleting information requested by this Subpoena should be suspended.

Because Electronically Stored Information is an important and irreplaceable source of evidence, you must take appropriate steps to preserve all potentially relevant Documents within your control or which you have the practical ability to access, including but not limited to preserving information from computer systems, removable or portable electronic media (like CDs/DVDs, USB drives), email, text/instant messaging, and other electronic correspondence at work and other locations, word processing documents, spreadsheets, databases, calendars, telephone logs, cell phones, voicemail, blogs, “tweets” or other social media, internet usage files, website data, personal computers/laptops, personal data assistants (PDAs), servers, and archives/backup files, as well as other tangible documentation that will be relevant to the discovery of admissible evidence in this matter, so as to avoid any potential claims for spoliation of evidence. This request pertains not only to Documents that are directly responsive to this Subpoena, but to all other Documents that relate to the subject of this investigation.

Preservation of electronic data in its native format is essential, as a paper printout of text contained in a computer file does not completely reflect all information contained within an electronic file. Additionally, due to its format, electronic evidence can be easily altered, deleted, corrupted or otherwise modified. Accordingly, you are required to take every reasonable step to preserve this information until the resolution of this matter. This includes, but is not limited to, the following obligations:

- a. Discontinue all data destruction and overwriting/recycling processes of relevant data;
- b. Preserve passwords, decryption procedures (and accompanying software), access codes, ID codes, etc.; and
- c. Maintain all pertinent information and tools needed to access, review and reconstruct all requested or potentially relevant electronic data.

Your obligations under the law are ongoing and should be considered in force and effect until the resolution of this matter. Accordingly, with regard to electronic data and Documents that are created subsequent to the date of this Subpoena, relevant evidence is not to be destroyed or overwritten and you should take whatever steps are necessary to avoid destruction of potentially-relevant evidence.

13. Unless otherwise noted, the time period applicable to the requests below is January 1, 2014, through the due date for production under this subpoena.

DOCUMENT REQUESTS

1. All organizational charts for The Southern Poverty Law Center since January 1, 2014.
2. Documents disclosing to Alabama donors or prospective Alabama donors Your use or proposed use of Informants.
3. Exemplar Documents used to market or advertise Your mission, fundraising objectives, and services to prospective Alabama donors, including the date each Document was created and length of time the Document was used for Your marketing or advertising.
4. Documents identifying all names, aliases, or DBAs You used when soliciting charitable contributions, or which have been used by third parties when soliciting on Your behalf.
5. Documents sufficient to show any changes on Your website or in other Communications regarding Your solicitation of donations and the date any changes were made.
6. Documents sufficient to show changes on Your website or in other Communications relating to where or how proceeds of donations will be used or distributed.
7. Documents sufficient to show changes on Your website or in other Communications regarding Your use of Informants.
8. Documents sufficient to identify all websites You have used to solicit donations.
9. Documents sufficient to show the annual donations You received from donors in the State of Alabama.
10. Documents sufficient to show the annual donations You received from donors outside the State of Alabama.
11. Documents sufficient to show Your annual disbursements of donated funds, directly or indirectly, to Informants.
12. Documents sufficient to show Your policies and procedures for requesting, approving, or paying funds related to Your Informant program.
13. Documents sufficient to reflect the percentage of Your annual budget allocated to Informant-related costs.

14. Documents sufficient to show any donation, payment, or other financial contribution paid to any group or individual appearing on Your “Extremist Files”¹, or appearing on any similar list, map, or directory maintained by You, including, but not limited to, those identified on Your “hate map.”²
15. Internal Communications related to the disclosure or non-disclosure of the use of Informants.
16. Exemplars of all Communications with Alabama donors related to Your use of donor funds.
17. Documents required to obtain and maintain Your 501(c)(3) status or other licenses or certifications as a non-profit or charitable entity, including documents related to your registration as a charitable organization under Section 13A-9-71 of the Code of Alabama.
18. Documents sufficient to identify all Alabama addresses used by the Company, including, but not limited to, addresses where the Company actually operated and addresses where the Company received correspondence.
19. Documents containing representations You made (or information you provided) to technology companies, banks, credit card processors, financial infrastructure companies, financial technology companies, any other Financial Institution, or other businesses regarding The Southern Poverty Law Center’s “Extremists Files,” “Hate Map,” the Change the Terms coalition, The Southern Poverty Law Center’s Intelligence Project, and the No Blood Money Campaign, including, but not limited to, all Documents relating to any meeting, Communication, or conversation in which such representations were made.
20. Documents identifying all names, aliases, or DBAs You used when opening, administering, or otherwise maintaining accounts with any technology companies, banks, credit card processors, financial infrastructure companies, financial technology companies, or other Financial Institution.

¹ <https://www.splcenter.org/resources/extremist-files/>

² <https://www.splcenter.org/hate-map/>

In lieu of personal appearance, Your responses to the foregoing may be furnished on or before the date listed below either by mail or personal delivery. Records produced in response to this subpoena must be accompanied by the attached certification page from a custodian of records or other person qualified to certify, under penalty of perjury, that the records: a) were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; b) were kept in the course of the regularly conducted activity; and c) were made during the regular practice of the regularly conducted activity.

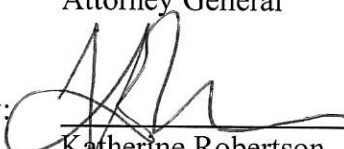
YOU ARE HEREBY COMMANDED to produce all responses to the information requests, as well as all documentary material and other tangible evidence, as described above, which is in your possession, custody, or control, or in the possession, custody, or control of your agents or employees to Assistant Attorney General Michael G. Dean by: 10:00 AM on Monday, June 1, 2026, at the following location:

**OFFICE OF THE ALABAMA ATTORNEY GENERAL
CONSUMER INTEREST DIVISION**

501 Washington Avenue
Post Office Box 300152
Montgomery, Alabama 36130-0152
(334) 242-7300
Michael.Dean@AlabamaAG.gov

Done this 11th day of May, 2026.

STEVE MARSHALL
Attorney General

By: 
Katherine Robertson
Chief Counsel, Deputy Attorney General