



May 1, 2020

VIA ELECTRONIC MAIL

Open Records Custodian
Office of the Secretary of State
214 State Capitol
Atlanta, Georgia 30334
openrecords@sos.ga.gov

Re: Open Records Request

Dear Records Custodian:

Pursuant to the Georgia Open Records Law (O.C.G.A. § 50-18-70 et seq.), American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office produce the following within three business days, or provide a written description of any responsive records with a timetable for their production within three business days:

1. All email communications (including email messages, email attachments, and calendar invitations) sent or received by the Georgia Secretary of State officials listed below regarding voter or election fraud related to absent voters or absentee ballots (including, but not limited to, any communications regarding Georgia's Absentee Ballot Fraud Task Force).

Secretary of State Officials:

- i. Brad Raffensperger, Secretary of State, or anyone communicating on his behalf (such as an assistant or scheduler)
- ii. Frances Watson, Chief Investigator, or anyone communicating on her behalf (such as an assistant or scheduler)
- iii. Gabriel Sterling, Chief Operating Officer
- iv. Jordan Fuchs, Deputy Secretary
- v. Chris Harvey, Elections Director, or anyone communicating on his behalf (such as an assistant or scheduler)
- vi. Ted Koval, Deputy Elections Director
- vii. Kevin Rayburn, Deputy Elections Director and Deputy General Counsel
- viii. Gabrielle Holland, Senior Elections Attorney
- ix. Jasmine Shannon, Legal Affairs Coordinator



2. All email communications (including email messages, email attachments, and calendar invitations) between 1) Chief Investigator Frances Watson or Elections Director Chris Harvey, or anybody communicating on their behalf (such as an assistant or scheduler) and 2) any of the external individuals listed below.

External Individuals:

- i. Bobby Christine, U.S. Attorney for the Southern District of Georgia
 - ii. Shannon Wallace, Blue Ridge Judicial Circuit District Attorney
 - iii. Tasha Mosley, Clayton Judicial Circuit District Attorney
 - iv. Brad Rigby, Cordele Judicial Circuit District Attorney
 - v. Greg Edwards, Dougherty Judicial Circuit District Attorney
 - vi. Stephanie Woodard, Hall County Solicitor General
 - vii. Barry Morgan, Cobb County Solicitor
 - viii. Rosanna M. Szabo, Mountain Judicial Circuit Assistant District Attorney
 - ix. Jennifer Logan, Jackson County Elections Supervisor
 - x. Chris Channell, Glynn County Elections Supervisor
3. Any records containing any agendas, meeting notes, by-laws, policies, procedures, or reports in the possession of (or created, utilized, maintained, received, or distributed by) Georgia's Absentee Ballot Fraud Task Force.

Please provide all responsive records from March 1, 2020, to the date the search is conducted.

Please notify American Oversight of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fees.

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

In addition, American Oversight insists that your office use the most up-to-date technologies to search for responsive information and take steps to ensure that the most complete repositories of information are searched. American Oversight is available to work with you to craft appropriate search terms. **However, custodian searches are still required; your office may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.**

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

Please take appropriate steps to ensure that records responsive to this request are not deleted by your office before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your office can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or in PDF or TIF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

Conclusion

American Oversight is a 501(c)(3) nonprofit with the mission to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.¹

We share a common mission to promote transparency in government. American Oversight looks forward to working with you on this request. If you do not understand any part of this request, have

¹ American Oversight currently has approximately 15,450 page likes on Facebook and 102,300 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight/> (last visited April 29, 2020); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited April 29, 2020).

any questions, or foresee any problems in fully releasing the requested records, please contact Khahilia Shaw at records@americanoversight.org or 202.539.6507.

Sincerely,

A handwritten signature in blue ink that reads "Austin R. Evers". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Austin R. Evers
Executive Director
American Oversight