



August 21, 2020

VIA ELECTRONIC MAIL

Randy Howard
Superintendent of Elections and Voter Registration
500 W. Lamar Street
P.O. Box 295
Americus, GA 31709
rhoward@sumtercountyga.us

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

Re: Open Records Request

Dear Open Records Officer:

Pursuant to the Georgia Open Records Law, as codified at O.C.G.A. §§ 50-18-70 et seq., American Oversight makes the following request for public 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. Records sufficient to identify the total number of polling place closures or consolidations that occurred between June 25, 2013, and August 13, 2020.
2. Records sufficient to identify the total number of Sumter County absentee ballot applications that were (a) received and (b) rejected during the dates specified below.
3. Records sufficient to identify the number of Sumter County non-absentee voter registration applications that were (a) received and (b) rejected during the dates specified below, and any explanation or indication of the reason for the rejection.
4. Records sufficient to identify the number of voters in Sumter County who were removed from the voter rolls during the dates specified below, and the reason for the removal.



5. Records sufficient to identify the number of voters in Sumter County were moved to inactive status during the dates specified below.
6. Records sufficient to identify the total number of voter registration cancellation notices mailed to Sumter County voters during the dates specified below.

Please provide all responsive records for the following dates:

- December 1, 2015 to July 30, 2016
- February 26, 2018 to July 20, 2018
- December 1, 2019 to August 13, 2020

To the extent that this information is aggregated and maintained in a database or spreadsheet,¹ we would accept as responsive a printout from the database.² American Oversight does not object to the redaction of names, addresses, or other personally identifying information from records responsive to this request.

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.**

¹ American Oversight requests responsive data in a Microsoft Excel spreadsheet format, to the extent that your agency maintains such data in a database or other format that can be readily exported into such format.

² American Oversight recognizes that your office may use different terminology than the categories listed. American Oversight requests that you provide the requested information most closely related to each category, to the extent available. American Oversight welcomes the opportunity to discuss with you the types of data tracked and maintained by your agency that may be responsive to this request.

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.³

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

³ American Oversight currently has approximately 15,600 page likes on Facebook and 104,600 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Aug. 20, 2020); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Aug. 20, 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, appearing to read "Austin R. Evers", with a long horizontal flourish extending to the left.

Austin R. Evers
Executive Director
American Oversight