



November 19, 2020

VIA EMAIL

Open Records Custodian
Office of the Secretary of State
214 State Capitol
Atlanta, GA 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 timeline for their availability within three business days:

1. All email communications (including emails, calendar invitations, and attachments thereto) between (a) any of the Secretary of State’s office officials listed in Column A, below, and (b) any of the external parties listed in Column B, below.
2. All records reflecting the content of any meetings or calls between (a) any of the Secretary of State’s office officials listed in Column A, below, and (b) any of the external parties listed in Column B, below, including any written communications about the meetings/calls, agendas, lists of attendees, minutes, summaries, handwritten notes, materials exchanged during the meetings/calls, and any preparatory or background materials prepared for any of the attendees/participants.
3. All text message chains/conversations or message chains/conversations on messaging applications similar in form to text messages (such as Signal, WhatsApp, Facebook Messenger, Twitter DMs, etc.) between (a) any of the Secretary of State’s office officials listed in Column A, below, and (b) any of the external parties listed in Column B, below.

Column A: Secretary of State Officials	Column B: External Parties
i. Brad Raffensperger, Secretary of State (brad@sos.ga.gov)	Office of Senator Lindsey Graham: i. Senator Lindsey Graham, or anyone communicating on his



<ul style="list-style-type: none"> ii. Anyone serving as Chief of Staff to Secretary of State Raffensperger iii. Jordan Fuchs, Deputy Secretary of State (jfuchs@sos.ga.gov, jordyfuchs212@gmail.com) iv. Ryan Germany, General Counsel (rgermany@sos.ga.gov) v. Chris Harvey, Elections Director (wharvey@sos.ga.gov) 	<ul style="list-style-type: none"> behalf (such as an assistant or scheduler) ii. Richard Straus Perry, Chief of Staff iii. Matt Rimkunas, Deputy Chief of Staff iv. Nick Myers, Senior Counsel v. Scott Graber, Counsel vi. Kevin Bishop, Communications Director vii. Alice James, Scheduler viii. Anyone communicating from an email address ending in @lgraham.senate.gov ix. Anyone serving on the Senate Judiciary Committee or any of its subcommittees, including anyone with an email address ending in judiciary-rep.senate.gov <p>Team Graham, Inc.:</p> <ul style="list-style-type: none"> i. Scott Farmer, Campaign Manager ii. Thomas W. Arrighi, Communications Director iii. Mary Hollis McGreevy, Scheduler iv. Anyone communicating from an email address ending in @lindseygraham.com <p>Office of Representative Doug Collins:</p> <ul style="list-style-type: none"> i. Representative Doug Collins, or anyone communicating on his behalf (such as an assistant or scheduler) ii. Brendan Belair, Chief of Staff iii. Joel Kats, District Chief of Staff iv. Jon Ferro, Deputy Chief of Staff v. Amanda Gonzalez, Communications Director vi. David McDonald, Counsel vii. Anyone communicating from an email address ending in dougforgeorgia.com
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For ease of reference, American Oversight has included email addresses where possible for the Secretary of State officials listed. To be clear, however, American Oversight's request is not limited to email communications.

Please provide all responsive records from November 3, 2020, through the date your office receives 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.**

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 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,



Austin R. Evers
Executive Director
American Oversight

¹ American Oversight currently has approximately 15,630 page likes on Facebook and 106,100 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Nov. 16, 2020); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Nov. 16, 2020).