



January 3, 2022

VIA EMAIL

Sadie Sullivan, Lander County Clerk
Lander County Courthouse
50 State Route 305
Battle Mountain, NV 89820
landercountyclerk@gmail.com

Re: Public Records Act Request

Dear County Clerk Sullivan:

Pursuant to the Nevada Public Records Act, N.R.S. Chapter 239, American Oversight makes the following request for records.

Requested Records

American Oversight requests that Lander County produce the following records within five business days:

1. All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) between (a) any of the Lander County officials listed in Column A, below, and (b) any of the external individuals listed in Column B, below (including, but not limited to, at the listed email addresses or domains).

Column A: Lander County Officials	Column B: External Individuals
a. Bryan Sparks, Commissioner	i. Nevada Secretary of State Candidate Jim Marchant
b. Art Clark III, Commissioner	ii. Nevada Representative Annie Black (annie@electannieblack.com)
c. Patsy A. Waits, Commissioner	iii. Mike Lindell (mike@mypillow.com)
d. Wallace "JR" Thomas, Commissioner	iv. Matthew DePerno (matthew@depernolaw.com)
e. Kathleen V. Ancho, Commissioner	v. Matt Braynard
f. Sadie Sullivan, County Clerk	vi. Jesse Binnall (jesse@binnall.com)
g. Bartolo "Bert" Ramos, County Manager	vii. Kevin Freeman (kevin@freemanglobal.net)
	viii. Lance Wallnau
	ix. Christina Bobb (christina.bobb@oann.com)



	x.	Chanel Rion (chanel.rion@oann.com)
	xi.	Ben Cotton (ben.cotton@cyfir.com)
	xii.	Shiva Ayyadurai (vashiva@vashiva.com or @echomail.com)
	xiii.	Colonel Phil Waldron (phil@onewarrior.com , JWRLLC@gmail.com , or p@bonfiresearch.org), Russell Ramsland (ryuks9sq@alliedspecialops.us), James Keet Lewis III (keet@jkeetlewis.com), or anyone communicating on behalf of Allied Security Operations Group (@alliedspecialops.us)
	xiv.	Jovan Hutton Pulitzer (jovanhuttonpulitzer@gmail.com)
	xv.	Doug Logan (dlogan@cyberninjas.net)
	xvi.	Mike Flynn (schedule@generalflynn.com)
	xvii.	Jackson Lane (jacksonlane@americasfuture.net)
	xviii.	Lin Wood (lwood@fightback.law)
	xix.	Michael Bowman (mbowman@alecaction.org)
	xx.	Patrick Byrne (@americaproject.com)
	xxi.	Mike Roman (mikeroman@protonmail.com)
	xxii.	Abbey Jones
	xxiii.	Todd Sandler (todd@americaproject.com)
	xxiv.	Ken Blackwell (kennethblackwell693@gmail.com) or Hogan Gidley (hogan@americafirstpolicy.com)
	xxv.	Catherine Engelbrecht (catherine@truethevote.org)
	xxvi.	John Eastman (jeastman@claremont.org)
	xxvii.	Reince Priebus (rp@michaelbest.com)
	xxviii.	Jacqueline Timmer (@got-freedom.org)

	xxix.	Phill Kline (phillklineva@gmail.com or @got-freedom.org)
	xxx.	Jenna Ellis (@falkirkcenter.com or @thomasmoresociety.org)
	xxxi.	Ed Corrigan or Cleta Mitchell (cleta@cletamitchell.com or cmitchell@foley.com)
	xxxii.	Raj Doraisamy (rajdothis@defendourunion.org)
	xxxiii.	Kurt Olsen
	xxxiv.	Al Hartman or Jenny Limcher (jlimcher@hi-reit.com)
	xxxv.	Thomas Lane (thomasscottlane@gmail.com)
	xxxvi.	Ivan Raiklin (ivan.raiklin@gmail.com or socialmediaraiklin@gmail.com)
	xxxvii.	Seth Keshel
	xxxviii.	Mark Finchem (mfinchem@azleg.gov or markfinchem@me.com)
	xxxix.	Wendy Rogers (wrogers@azleg.gov or wendyjrogers@gmail.com)
	xl.	Amanda Chase (amanda@chaseforva.com)
	xli.	Mark Meadows
	xlii.	Rudy Giuliani
	xliiii.	Michael McDonald, or anyone communicating on behalf of the Nevada Republican Party (@nevadagop.org)

2. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) sent by any of the Lander County officials listed in Column A of item 1, above, containing any of the following search terms:

Search Terms:

- i. Maricopa
- ii. Cyberninjas
- iii. “Cyber Ninjas”
- iv. “Doug Logan”
- v. “Election audit”
- vi. “Election review”
- vii. “Forensic audit”
- viii. Recount
- ix. “Hand count”
- x. Hand-count

- xi. Dominion
- xii. ES&S
- xiii. “Election Systems”

In an effort to accommodate Lander County and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited item 2 of its request to emails sent by the listed officials. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both sent and received messages. This means, for example, that both County Clerk Sullivan’s response email containing the search term “Cyber ninjas” and the initial received message are responsive to this request and should be produced.

Please provide all responsive records from November 3, 2020, through the date the search is conducted.

Please consult with American Oversight on any fees the agency expects it may assess.

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

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics.
- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.

¹ American Oversight currently has approximately 16,200 page followers on Facebook and 109,300 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 3, 2022); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Jan. 3, 2022).

- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages.
- 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. N.R.S. § 239.010(3). If a request is denied in whole, please state specifically why 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 the agency 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.

Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. 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 agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF 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.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Taylor Stoneman at records@americanoversight.org or (202) 848-1319.

Sincerely,

/s/ Taylor Stoneman
Taylor Stoneman
on behalf of
American Oversight