



January 16, 2020

VIA ELECTRONIC MAIL

Bonnie Wells
Jefferson County Clerk
217 East Broad Street
P.O. Box 658
Louisville, GA 30434
bwells@jeffersoncountyga.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 Jefferson County 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:

All communications (including emails, email attachments, text messages, calendar invitations, letters, memoranda, or other communications) sent by any permanent Jefferson County elections staff¹ (including, but not limited to the staff members listed below in Column A) and which contain any of the keywords listed below in Column B.

Column A: Jefferson County Elections Staff Members	Column B: Search Keywords:
<ol style="list-style-type: none">1. Elections Superintendent Susan Gray2. Deputy Registrar Natasha Mack3. County Administrator Adam Brett	<ol style="list-style-type: none">1. "black voter"2. "black voters"3. "Black Vote"4. "Black Votes"

¹ To clarify, American Oversight is not requesting communications from solely temporary election workers such as ballot by mail clerks, box truck drivers, call center representatives, central receiving station election workers, early voting poll workers, election day poll workers, field support technicians, senior support technicians, student election day poll workers, supply preparation and delivery workers, or any other solely temporary election employees. Communications are responsive if sent by any permanent employee of the Jefferson County Clerk’s office with election administration responsibilities.



4. Board of Elections member Carolyn Huntley	5. "Black Voters"
5. Board of Elections member Rebecca Gibbons	6. "Black Voting"
6. Board of Elections member Verna Hudson	7. "Black Votes Matter"
7. Board of Elections member Charles Milburn	8. "Black Voters Matter"
8. Board of Elections member William Valduga	9. "Black Voting Matters"
	10. "African-American"
	11. "African-American vote"
	12. "African American vote"
	13. "Latosha Brown"
	14. "Cliff Albright"
	15. "The South is Rising"
	16. "Woke Vote"
	17. "bus"
	18. "buses"
	19. "to the polls"
	20. "Get Out the Vote"
	21. "Getting Out the Vote"
	22. "Get Out and Vote"
	23. "GOTV"
	24. "voter outreach"
	25. "Election Protection"
	26. "senior citizen"
	27. "senior citizen"
	28. "living center"
	29. "leisure center"

American Oversight requests all communications including, but not limited to, email communications. With regard to your search for responsive email communications, American Oversight agrees that the search may be limited to emails sent by Jefferson County officials in an effort to accommodate Jefferson County and reduce the number of potentially responsive records. Despite this search accommodation, American Oversight still requests that complete email chains be produced, displaying both sent and received messages.

Please provide all responsive records from April 1, 2018, to December 31, 2018.

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; governmental authorities may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.**

Please search all records regarding official business, **including files or emails in the personal custody of your officials, such as personal email accounts.**

If this request is denied in whole or in part, we ask that you cite in writing the specific statutory exemption upon which you rely, as required by law. 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 and 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

We share a common mission to promote transparency in government. American Oversight looks forward to working with your office 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,

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

Austin R. Evers
Executive Director
American Oversight