



April 23, 2020

VIA ELECTRONIC MAIL

Russell Bridges
Chatham County Elections Supervisor
1117 Eisenhower Drive, Suite F
Savannah, Georgia 31406
swcree@chathamcounty.org
voter@chathamcounty.org

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.

We understand that your office's capacity may be impacted by the COVID-19 outbreak and response efforts. Should that be the case, we would be happy to discuss potential streamlining or narrowing of our request, reasonable delays in processing this request, or other accommodations. Please feel free to contact us at the telephone number listed in the final paragraph of this letter; we look forward to working with you.

Requested Records

American Oversight requests that Chatham 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:

1. All records, data points and documents sufficient to identify the total number of election staff and poll workers available to facilitate the Presidential Preference Primary to be held on June 9, 2020, and the November general election to be held on November 3, 2020.

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

2. All email communications (including emails, complete email chains, email attachments, calendar invitations, and attachments thereto) sent or received by any of the County officials listed below regarding any staffing decisions—including personnel reductions, changes or reassignments—poll worker directives, planned precinct closures, election scheduling delays, or other proposals, delays, or changes to Board of Elections meetings or to current county voting procedures—including



the now-postponed Presidential Preference Primary—as a result of the current coronavirus crisis.

Chatham County Voter Registration and Elections Department:

1. Supervisor Russell Bridges
2. Assistant Supervisor Lynn Trabue

- Chatham County Board of Elections:

1. Chairman Thomas Mahoney III
2. Marianne Heimes
3. Malinda Hodge
4. Antwan Lang
5. Debbie Rauers

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

1. Any guidance documents, directives, policy changes, or other documents sent from any of the Office of the Secretary of State officials listed below in Column A to any of the County custodians listed below in Column B.

Column A: Office of the Secretary of State Officials	Column B: Chatham County Custodians
<ol style="list-style-type: none"> 1. Secretary of State Brad Raffensperger, or anyone communicating on his behalf 2. Anyone serving as Chief of Staff to Secretary Raffensperger 3. Deputy Secretary of State Jordan Fuchs 4. Director of External Affairs Sam Teasley 5. Press Secretary Ari Schaffer 6. Executive Assistant Donna Nealey 7. Elections Division Director Chris Harvey, or anyone communicating on his behalf 	<p>Chatham County Voter Registration and Elections Department:</p> <ol style="list-style-type: none"> 1. Supervisor Russell Bridges 2. Assistant Supervisor Lynn Trabue <p>Chatham County Board of Elections:</p> <ol style="list-style-type: none"> 1. Chairman Thomas Mahoney III 2. Marianne Heimes 3. Malinda Hodge 4. Antwan Lang 5. Debbie Rauers

For each request, American Oversight suggests including the following terms in your search for responsive records:

Key Terms:

1. Primary
2. "Presidential Preference Primary"
3. "Presidential Primary"
4. "PPP"
5. Precinct
6. Absentee ballot
7. "Vote-by-mail"
8. "Vote by mail"
9. "In-Person Voting"
10. "In Person Voting Site"
11. Ballot
12. Suspended
13. Delay
14. Postpone
15. Test
16. Testing
17. Kit
18. Defect
19. Coronavirus
20. Corona
21. Virus
22. COVID
23. Wuhan
24. Hoax
25. POTUS
26. "Kung Flu"
27. "Kung-Flu"
28. "Yellow Peril"
29. "Red Dawn"
30. Epidemic
31. Pandemic
32. Contagion
33. Infect
34. Infection
35. Transmission
36. Asymptomatic
37. Isolate
38. Isolation
39. Sterilize
40. Sanitize
41. Decontaminate
42. Decontamination
43. Quarantine
44. Quarantining
45. Distancing
46. "stay-at-home"
47. "stay at home"
48. "shelter in place"
49. "shelter-in-place"
50. Beach
51. Beaches
52. Vaccine
53. Hydroxychloroquine
54. Chloroquine
55. Plaquenil
56. Lockdown
57. "face mask"
58. N95
59. Decontamination
60. Decontaminate
61. Sterilize
62. Ventilator
63. Respirator
64. ICU
65. "Hospital bed"
66. Panic
67. "Disaster relief"
68. Unemployment
69. "Drive through"
70. "Drive-through"
71. "Drive-thru"
72. "Drive thru"
73. PPE
74. "Medical Supplies"
75. Shortage
76. "Defense Production Act"
77. DPA
78. Nationalize
79. "Crisis response"
80. CRA
81. Stockpile
82. SNS

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 the County uses 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 15,500 page likes on Facebook and 102,300 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight/> (last visited Apr. 13, 2020); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited Apr. 13, 2020).