



October 8, 2020

VIA EMAIL

Public Information Officer
Nevada Secretary of State
101 North Carson Street, Suite 3
Carson City, NV 89701
sospio@sos.nv.gov

Re: Public Records Act Request

Dear Public Information Officer:

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

In August, several Secretaries of State or their deputies reportedly participated in a briefing organized by the Heritage Foundation, and were told at the briefing that U.S. Department of Homeland Security official Cameron Quinn would be serving as a liaison to elections officials.¹ American Oversight seeks records of communications with the Heritage Foundation or Ms. Quinn.

Requested Records

American Oversight requests that Office of the Secretary of State produce the following records within five business days:

1. All records reflecting the content of the Secretaries of State Briefing hosted by the Heritage Foundation on or around August 4, 2020, which Chief Deputy Secretary of State Scott W. Anderson indicated in a publicly released email he planned to attend.² Records responsive to this request include any calendar entries, handwritten or electronic notes from the briefing, memoranda or readouts about the content of the briefing, and materials provided to or exchanged among attendees.

¹ Mike Spies et al., *No Democrats Allowed: A Conservative Lawyer Holds Secret Voter Fraud Meetings with State Election Officials*, ProPublica (Sept. 15, 2020, 10:45 AM), <https://www.propublica.org/article/no-democrats-allowed-a-conservative-lawyer-holds-secret-voter-fraud-meetings-with-state-election-officials>.

² Email from Scott W. Anderson to Kaitlynn Samalis Aldrich, July 14, 2020, available at <https://www.documentcloud.org/documents/7208204-Nevada-Late-Winter-Thru-Summer.html#document/p2>.



2. All email communications (including full email chains and attachments) between (a) any of the Nevada officials listed in Column A below and (b) any of the outside individuals listed in Column B below:

Column A: Nevada officials	Column B: Outside individuals
a. Secretary of State Barbara Cegavske b. Chief Deputy Secretary of State Scott W. Anderson c. Executive Assistant Maria Tello-Magana	a. Hans von Spakovsky (hans.vonspakovsky@heritage.org) b. Kaitlynn Samalis Aldrich (Kaitlynn.samalis@heritage.org) c. Alexander Phipps (alexander.phipps@heritage.org) d. U.S. Department of Homeland Security official Cameron Quinn

Please provide all responsive records from August 1, 2020, to the date of search.

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.³

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. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.

³ American Oversight currently has approximately 15,600 page likes on Facebook and 105,200 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Oct. 6, 2020); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Oct. 6 2020).

- In conducting your search, please understand the terms “record,” “document,” and “information” in their 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 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.
- 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 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 line extending to the left.

Austin R. Evers
Executive Director
American Oversight