



December 10, 2020

VIA EMAIL

Lynn Ledford, Director of Elections
Gwinnett County Registrations and Elections Office
75 Langley Drive
Lawrenceville, GA 30046
lynn.ledford@gwinnettcountry.com

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 and All Voting is Local Georgia (together, Requesters) make the following request for records.

Requested Records

Requesters ask 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:

All email communications (including emails, complete email chains, calendar initiations, and attachments thereto) between (a) any representative of the Gwinnett County elections office and (b) any official in the Office of the Secretary of State (@sos.ga.gov) regarding investigations, evaluations, reviews, or probes into potential cases of election fraud, voter fraud, or election irregularities (including, but not limited to, communications with any Investigator employed by the Office of the Secretary of State).

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

Please notify Requesters of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fees.

Requesters insist 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. Requesters are 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, Requesters welcome 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, Requesters 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, please also provide responsive material on a rolling basis.

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 Requesters, please do not hesitate to contact Requesters to discuss this request. Requesters welcome 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, Requesters and your office can decrease the likelihood of costly and time-consuming litigation in the future.

We share a common mission to promote transparency in government. Requesters 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



Aklima Khondoker
Georgia State Director, All Voting is Local
The Leadership Conference Education Fund
The Leadership Conference on Civil and
Human Rights