



January 5, 2021

VIA ELECTRONIC MAIL

Open Records Custodian
Office of the Secretary of State
214 State Capitol
Atlanta, GA 30334
openrecords@sos.ga.gov

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.

Requested Records

American Oversight requests that your office produce the following within three business days:

All communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, and messages on messaging platforms (such as The Buzz, Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp)) between the officials listed in Column A below and the external individuals listed in Column B below.

Column A: Office of the Secretary of State Officials	Column B: Specified External Individuals
<ul style="list-style-type: none"> i. Brad Raffensperger, Secretary of State ii. Anyone serving as Chief of Staff to Secretary Raffensperger iii. Jordan Fuchs, Deputy Secretary of State (including but not limited to at jordyfuchs212@gmail.com) iv. Ryan Germany, General Counsel v. Chris Harvey, Elections Director vi. Gabriel Sterling, Voting System Implementation Manager (including but not limited to at sterlinginnovative@gmail.com) 	<ul style="list-style-type: none"> a. Cleta Mitchell (including, but not limited to, at cmitchell@foley.com) b. Kurt Hilbert (including, but not limited to, at khilbert@hilbertlaw.com) c. Mark Meadows, White House Chief of Staff d. Pasquale “Pat” Cipollone, Counsel to the President e. Rudolph Giuliani, or anyone communicating on his behalf (such as Jo Ann Zafonte, Christianne Allen, Beau Wagner, or anyone communicating from an



	<p>email address ending in @giulianisecurity.com, giulianipartners.com, and gdcillc.com))</p> <p>f. Joseph diGenova, Victoria Toensing, or anyone communicating from an email address ending in @digenovatoensing.com</p> <p>g. Sidney Powell, or anyone communicating from an email address ending in @federalappeals.com</p> <p>h. Jenna Ellis, or anyone communicating from an email address ending in @falkirkcenter.com or @thomasmore.org</p> <p>i. Anyone communicating on behalf of the Donald J. Trump for President campaign, including anyone communicating from an email address ending in @donaldtrump.com, @donaldjtrump.com, @trumpvictory.com, or @trumporg.com</p> <p>j. Anyone communicating from the White House Office, including anyone using an email address ending in who.eop.gov</p> <p>k. David Schafer, or anyone communicating from an email address ending in @gagop.org</p>
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Communications about official business sent from both governmental and personal email accounts are responsive to this request.

Please provide all responsive records from December 20, 2020, through the date the request is received.

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

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; 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

¹ American Oversight currently has approximately 15,600 page likes on Facebook and 106,000 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 5, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Jan. 5, 2021).

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,

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