



June 1, 2022

**VIA EMAIL**

Tracie Vickers, County Clerk  
101 South Peterson Avenue  
Douglas, GA 31533  
[openrecordsrequest@coffeecounty-ga.gov](mailto:openrecordsrequest@coffeecounty-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 email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) and text messages or messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, Twitter direct messages, Facebook messages, WhatsApp, Signal, Telegram, or Parler) between (A) the Coffee County officials specified below, and (B) the external individuals or entities listed below.

**A. Coffee County Board of Elections and Registration Officials:**

1. Vice-Chair, Wendell Stone
2. Eric Chaney, Member
3. Matthew McCullough, Member
4. C.T. Peavy, Member

**B. Specified Entities and Individuals:**

1. Bernard Kerik ([bernardkerik@protonmail.com](mailto:bernardkerik@protonmail.com))
2. Boris Epshteyn ([bepshteyn@gmail.com](mailto:bepshteyn@gmail.com))
3. Conan James Hayes ([surfsupnow@protonmail.com](mailto:surfsupnow@protonmail.com))
4. Christina Bobb ([christina@cgbstrategies.com](mailto:christina@cgbstrategies.com), [christina.bobb@oann.com](mailto:christina.bobb@oann.com), and anyone communicating from an email address ending in @oann.com)
5. Garland Favorito ([garlandf@msn.com](mailto:garlandf@msn.com), [garlandf@voterga.net](mailto:garlandf@voterga.net), and anyone communicating from an email address ending in @voterga.net or @voterga.org)



6. Jim (James) Bopp, Jr. ([jboppjr@aol.com](mailto:jboppjr@aol.com)) and anyone communicating from an email address ending in @bopplaw.com
7. Jenna Ellis ([jenna.ellis.esq@gmail.com](mailto:jenna.ellis.esq@gmail.com))
8. Jovan Hutton Pulitzer ([jovanhuttonpulizter@gmail.com](mailto:jovanhuttonpulizter@gmail.com))
9. Katherine Friess ([kfriess@protonmail.com](mailto:kfriess@protonmail.com))
10. Lin Wood ([lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com), [lwood@fightback.law](mailto:lwood@fightback.law) and anyone communicating from an email address ending in @fightback.law)
11. Phil Waldron ([phil@onewarrior.com](mailto:phil@onewarrior.com), [p@bonfiresearch.org](mailto:p@bonfiresearch.org), and anyone communicating from an email address ending in @bonfiresearch.org)
12. Russ Ramsland ([yrku9sqs@protonmail.com](mailto:yrku9sqs@protonmail.com), [ryuks9sq@alliedspecialops.us](mailto:ryuks9sq@alliedspecialops.us), and anyone communicating from an email address ending in @alliedspecialops.us)
13. Scott Hall ([u3700@zebraduck.net](mailto:u3700@zebraduck.net))
14. Seth Keshel ([skeshel@gmail.com](mailto:skeshel@gmail.com), [skeshel@protonmail.com](mailto:skeshel@protonmail.com))
15. Sidney Powell ([sp@seeking-justice.org](mailto:sp@seeking-justice.org), [sherlock1776@protonmail.com](mailto:sherlock1776@protonmail.com), [sidney@federalappeals.com](mailto:sidney@federalappeals.com), and anyone communicating from an email address ending in @federalappeals.com)
16. William Charles Bundren, III ([charles@bundrenlaw.net](mailto:charles@bundrenlaw.net))
17. Former National Security Advisor Michael Flynn, and anyone communicating from an email address ending in @generalflynn.com\*
18. Ben Cotton, and anyone communicating on behalf of CyFir (including anyone communicating from an email address ending in @cyfir.com)\*
19. Doug Logan ([dlogan@cyberninjas.com](mailto:dlogan@cyberninjas.com), [doug@fightback.law](mailto:doug@fightback.law)), and anyone communicating on behalf of Cyber Ninjas (including anyone communicating from an email address ending in @cyberninjas.com)
20. Jim (James) Penrose\*

**\* In the event that your office requires a direct email address to perform its search, for this custodian, please use in your search the external individual's name as a search term, and the provided domain name, if provided.**

For example, a search for Jim (James) Penrose would include the following search terms:

- "Jim Penrose"
- "James Penrose"

A search for Ben Cotton would include both of the following search terms:

- "Ben Cotton"
- "@cyfir.com"

Please provide all responsive records from November 3, 2020, through January 20, 2021.

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

### **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.
- 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. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Open Records Act.<sup>1</sup>
- 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 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.

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

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<sup>1</sup> O.C.G.A. § 50-18-70(b)(2).

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.

### **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.<sup>2</sup>

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](mailto:records@americanoversight.org) or (202) 539-6507. Also, if American Oversight's request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

*/s/ Khahilia Shaw*  
Khahilia Shaw  
on behalf of  
American Oversight

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<sup>2</sup> American Oversight currently has approximately 16,000 followers on Facebook and 117,400 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited May 31, 2022); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited May 31, 2022).