



**LYNN MARIE GOYA**  
 Clark County Clerk  
 200 Lewis Avenue  
 Box 551604  
 Las Vegas, NV 89155-1604  
 (702) 671-0500  
[ClerkRec@ClarkCountyNV.gov](mailto:ClerkRec@ClarkCountyNV.gov)

# PUBLIC RECORDS REQUEST

## Pursuant to NRS 239

**INSTRUCTIONS**

This form is to be used to request all records in the legal custody or control of the Clark County Clerk’s Office. All information in Section A is required. No-fee requests will automatically be fulfilled. Requests that entail extraordinary time or resources will incur a fee that must be approved by the requestor before the public records request can be fulfilled.

**SECTION A – TO BE COMPLETED BY REQUESTER**

Full Name Taylor Stoneman Email records@americanoversight.org  
 Business Name American Oversight Phone # (202) 848-1319  
 Mailing Address American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005  
 City Washington, DC State \_\_\_\_\_ Zip Code 20005

Check here if this is a media request. Specify the deadline date and time: \_\_\_\_\_ am/pm  
*For media requests needed within 48 hours, also call the PIO’s office at (702) 455-5534.*

Describe the records you are requesting. Please be as specific as possible and include enough detail to assist staff in locating the records. Include relevant dates or a date range. For multiple records, you may attach additional pages.

\_\_\_\_\_  
 Please see attached request (NV-CLARK-23-0115)

Please select the preferred method of receiving the requested records:

- By postal mail at the mailing address above
- By email at the email address above (Even if you choose to receive the records via email there may be a per page cost)
- In person
- Special delivery (additional charges may apply) \_\_\_\_\_

**• STOP! DO NOT COMPLETE ANYTHING ELSE BELOW THIS SECTION AT THIS TIME. •**

**Submit your request via mail or email using the address above or by using the submit button and a response will be provided within 5 days of receipt.**

**SUBMIT**

**SECTION B – TO BE COMPLETED BY COUNTY CLERK STAFF**

Estimated fee to fulfill request: \$ \_\_\_\_\_ Estimated time to fulfill request: \_\_\_\_\_ hours/days/weeks  
 Estimated date to fulfill request: \_\_\_\_/\_\_\_\_/\_\_\_\_ Estimate provided by: \_\_\_\_\_  
 Additional Information: \_\_\_\_\_

**SECTION C – TO BE COMPLETED BY REQUESTER UPON RECEIPT OF ESTIMATED FEE**

By signing below, you are accepting financial responsibility for this request and agree to pay the estimated fee in section B above. You also understand that records will not be released until payment is received by the County Clerk’s Office unless there is no fee.

X \_\_\_\_\_ Date \_\_\_\_/\_\_\_\_/\_\_\_\_

**Please send this signed and dated agreement via USPS mail or email using the address above.  
 Payment should be in the form of a cashier’s check or money order made payable to County Clerk. Do not send cash.**



February 2, 2023

**VIA EMAIL**

Lynn Marie Goya  
Clark County Clerk  
200 Lewis Avenue  
Box 551604<sup>1</sup>  
Las Vegas, NV 89155  
[ClerkRec@ClarkCountyNV.gov](mailto:ClerkRec@ClarkCountyNV.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.

**Requested Records**

American Oversight requests that the Clark County Clerk's Office produce the following records within five business days:

All documents provided by the Clark County Clerk's Office to the U.S. Department of Justice's Special Counsel in response to a subpoena for communications of county officials from June 1, 2020, through January 20, 2021.

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

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<sup>1</sup> For further identifying information, see Zachary Cohen, *Special Counsel Jack Smith Gets Trove of New Documents from Local Election Officials*, CNN, updated Jan. 4, 2023, <https://www.cnn.com/2023/01/04/politics/special-counsel-documents-local-election-officials/index.html>.



website and promotes their availability on social media platforms, such as Facebook and Twitter.<sup>2</sup>

### **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.
- 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.

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<sup>2</sup> American Oversight currently has approximately 16,000 followers on Facebook and 113,100 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 18, 2023); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Jan. 18, 2023).

## **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 Taylor Stoneman at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 848-1319.

Sincerely,

/s/ Taylor Stoneman  
Taylor Stoneman  
on behalf of  
American Oversight