



The Office of Secretary of State

Brad Raffensperger

SECRETARY OF STATE

Open Records Officer

February 18, 2020

VIA EMAIL

American Oversight
Austin R. Evers
Executive Director
1030 15th Street NW, Suite B255
Washington, DC 20005
records@americanoversight.org

Re: 2020-151- American Oversight

Dear Mr. Evers:

This letter is in response to your Open Record Request on February 13, 2020, made pursuant to Georgia's Open Records Act (O.C.G.A. § 50-18-70) asking for the following records:

American Oversight requests that the Office of the Secretary of State produce the following within three business days, or provide a written description of any responsive records with a timetable for their production within three business days:

All email communications (including emails, complete email chains, email attachments, and calendar invitations) regardless of subject matter sent by (a) former Secretary of State Brian Kemp, or anyone communicating on his behalf, such as assistants or schedulers to (b) any of the external individuals or entities listed below.

Georgia Secretary of State Brad Raffensperger's Office | Elections Division
2 MLK Jr. Dr. SE | West Tower | Suite 802 | Atlanta | Georgia | 30334

External Individuals and Entities

1. Donald “Don” Trump Jr.
(@trumporg.com)
2. Eric Trump (@trumporg.com)
3. Ivanka Trump (@ijkfamily.com,
@ivankatrump.com, imt@who.eop.gov,
@trumporg.com)
4. Jared Kushner (@ijkfamily.com,
@kushner.com,
@kushnercompanies.com,
jck@who.eop.gov, @trumporg.com)
5. Donald J. Trump for President
(@donaldtrump.com,
@victory.donaldtrump.com,
@trump.com, @donaldjtrump.com)
6. Trump Make America Great Again
Committee
7. Trump Victory
8. America First Action (@a1apac.org,
@prochcpas.com,
@redprintstrategy.com)
9. America First Policies
(@americafirstpolicies.org)
10. Republican National Committee
(@gop.com, @rnchq.com)
11. Great America Committee
(@greatamericacommittee.com)
12. Great America PAC
(@GreatAmericaPAC.com)
13. Great America Alliance
(@greatamericaalliance.com)
14. 45 Committee (@45committee.com)
15. Committee to Defend the President
(@committeetodefendthepresident.com,
dan@political.law,
@dbcapitolstrategies.com)
16. Any email address ending in
@trumphotel.com
17. Brad Parscale
18. Parscale Strategies
(@parscaledigital.com,
@gilesparscale.com, @parscale.com)
19. Thomas (Tommy) Hicks

20. William Stepien (wstepien@aol.com, wstepien1@aol.com)
21. Linda McMahon (@wwe.com, @wwecorp.com, @mcmahonventures.com, @mcm06.com)
22. Nick Ayers (jnayers@gmail.com, na@nickayers.com, nick@targetla.com)
23. Rob Porter
24. Stefan Passantino (spassantino@michaelbest.com, stefanpassantino@onebox.com)
25. Hope Hicks
26. Tim Murtaugh
27. Kayleigh McEnany
28. Ronna McDaniel

Please provide all responsive records from January 1, 2016, through November 8, 2018.

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

In addition, American Oversight insists that the Secretary of State's 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.

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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 the Secretary of State's 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.

After a preliminary review of the request and our records, we are unable to locate any records responsive to your request. This will serve as the final response to this request.

Sincerely,

Open Records Officer
Secretary of State