



Willa Fambrough, Chairperson
Rocky Raffle, Vice Chairperson
Adam Shirley, Secretary
Hunaid Qadir, Member
P. Ann Till, Member
Ms. Charlotte Sosebee, Director

ATHENS-CLARKE COUNTY BOARD OF ELECTIONS & VOTER REGISTRATION

155 E Washington Street, Athens, GA 30601

706-613-3152

www.athensclarkecounty.com

January 26, 2021

SENT VIA EMAIL: January 26, 1:30 PM

records@americanoversight.org

Sarah Wishingrad
American Oversight

RE: Open Records Request, dated December 21, 2020, addressed to Open Records Officer. Received by Charlotte Sosebee December 21, 2020.

Dear Sarah Wishingrad:

I am writing in response to your above-referenced open records request that was received on December 21, 2020. You requested the following records of the Athens-Clarke County Unified Government:

Attached:

- "1. All email communications (including emails, complete email chains, email attachments, calendar invitations, and attachments thereto), text messages, and messages on messaging platforms (such as The Buzz, Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp) between any of the county Board of Elections officials listed in Column A below and any of the Secretary of State officials listed below in Column B.
2. All records reflecting the substance of any oral communications (including any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, materials exchanged before, during, or following any oral communications, or any other related materials) between any of the county Board of Elections officials listed in Column A below and any of the Secretary of State officials listed below in Column B.

Column A:

**Athens-Clarke County Elections and
Registration & Board of Elections Officials**

Column B:

Office of the Secretary of State

- i. Director of Elections and Voter Registration Charlotte Sosebee
- ii. Elections Assistant Pamela Long
- iii. Elections Assistant Lisa McGlaun
- iv. Absentee Ballot Clerk Paula Williams
- v. Chairperson of the Board of Elections Jesse Evans
- a. Any official in the office of the Secretary of State of Georgia

(including anyone
communicating from an email
address ending in @sos.ga.gov)
b. Jordan Fuchs, Deputy
Secretary of State (including
2 GA-ATHENSCLARKE-20-2957
vi. Vice Chairperson Charles Knapper
vii. Board Secretary Willa J.
Fambrough
viii. Board Member Patricia A. Till
ix. Board Member Rocky Raffle
but not limited to at
jordyfuchs212@gmail.com)
c. Gabriel Sterling, Voting System
Implementation Manager
(including but not limited to at
sterlinginnovative@gmail.com)

Attached you will find the documents you requested. We received payment for the estimated amount of \$471.90; however, the length of time was nine hours less than anticipated. Therefore, you should expect to receive a reimbursement of \$174.73 within the next 30 days.

Should you have any additional questions, please call me at 706-613-3150.

The Unified Government of Athens-Clarke County ("County") and its officials and departments do not produce documents or records that are protected by the attorney-client privilege or the attorney work product doctrine under Georgia or federal law or that are otherwise exempt from production under the Georgia Open Records Act. The County expressly reserves and does not waive any statutory exemptions from disclosure provided by O. C.G.A. §§ 50-18-72, et seq. and other applicable laws.

Sincerely,

Pamela Long

Pamela Long, Elections Assistant

Attachments: 38 pages

CC: Sherrie Hines, Assistant Attorney of Athens-Clarke County
Charlotte Sosebee, Director of the Board of Elections Office.



Jesse Evans, Chairperson
Charles Knapper, Vice Chairperson
Willa Fambrough, Secretary
Rocky Raffle, Member
P. Ann Till, Member
Ms. Charlotte Sosebee, Director

ATHENS-CLARKE COUNTY BOARD OF ELECTIONS & VOTER REGISTRATION

155 E Washington Street, Athens, GA 30601

706-613-3152

www.athensclarkecounty.com

December 22, 2020

SENT VIA EMAIL: 12/22/2020@4:15pm

To: records@americanoversight.org

Sarah Wishingrad
American Oversight

RE: Open Records Request, dated December 21, 2020, addressed to Open Records Officer, received by the Charlotte Sosebee on December 21, 2020

Dear Ms. Wishingrad:

I am writing in response to your above-referenced open records request that was received on December 21, 2020. You requested the following records of the Athens-Clarke County Unified Government:

- "1. All email communications (including emails, complete email chains, email attachments, calendar invitations, and attachments thereto), text messages, and messages on messaging platforms (such as The Buzz, Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp) between any of the county Board of Elections officials listed in Column A below and any of the Secretary of State officials listed below in Column B.
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- i. Director of Elections and Voter Registration Charlotte Sosebee
- ii. Elections Assistant Pamela Long
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- v. Chairperson of the Board of Elections Jesse Evans
- a. Any official in the office of the Secretary of State of Georgia

(including anyone communicating from an email address ending in @sos.ga.gov)

b. Jordan Fuchs, Deputy Secretary of State (including 2 GA-ATHENSCLARKE-20-2957 vi. Vice Chairperson Charles Knapper vii. Board Secretary Willa J. Fambrough viii. Board Member Patricia A. Till ix. Board Member Rocky Raffle but not limited to at jordyfuchs212@gmail.com)

c. Gabriel Sterling, Voting System Implementation Manager (including but not limited to at sterlinginnovative@gmail.com)

Please provide all responsive records from December 10, 2020, to the date the request is received."

All documents that are released and responsive to your request that are maintained by the Athens-Clarke County Unified Government will be prepared for your review. The following information, to the extent that it exists, will be exempt from release pursuant to the following described provisions of the Open Records Act: O.C.G.A. § 50-18-72 (a) [with a summary of the type of exception]:

- (1) O.C.G.A. § 50-18-72(a) (20) [individual's social security number, personal email address or cellular phone number, etc.]
- (2) O.C.G.A. § 50-18-72 (21) [public employee personal information]

Additionally, I do need to explain a few things about what we have been able to determine thus far. As stated previously our IT Department generated 421 emails that were potentially responsive to your request.

I have broken down an estimate of cost in the chart below based on what we have found that appears to be responsive to your request:

DEPT/GOV'T BODY	HOURLY RATE	ANTICIPATED LENGTH OF TIME	COST ESTIMATE	NOTES/EXPLANATION
Information Technology	\$35.58	1.5 hours	\$53.37	
Attorney's Office	\$16.65	15 minutes	\$4.16	
Elections Staff search – Pamela Long, Elections Assistant	\$19.97	21 hours	\$419.37 – first 15 minutes = \$414.37	Review of 421 emails pulled from ACCGov servers; at least 3 minutes each
TOTAL			\$ 471.90	

Pursuant to O.C.G.A. § 250-18-71(d), an agency seeking costs in excess of \$500.00 shall notify the requester within a reasonable amount of time not to exceed three business days and inform the requester of the estimate of the costs, and the agency may defer search and retrieval of the records until the requester pays the estimated cost. The requestor is not charged for the first fifteen minutes of the time.

Charges for the time are not to exceed the salary of the lowest paid full-time employee, who in the discretion of the custodian of records has the necessary skill and training to perform the request.

Please mail payment of the estimated cost of \$1,215.17 for search, retrieval, review and redaction costs made payable to the Unified Government of Athens-Clarke County and addressed to me at P O Box 1828, Athens, Georgia 30603. Upon receipt of your payment, I will commence work on your request. Within three (3) business days of retrieval and completed review of the records, I will notify you in writing of any further exemptions and the date that the records will be available. Should you have any additional questions, please call me at 706-613-3150. Please understand that we are in the middle of an election and additional time may be needed to process your request.

The Unified Government of Athens-Clarke County ("County") and its officials and departments do not produce documents or records that are protected by the attorney-client privilege or the attorney work product doctrine under Georgia or federal law or that are otherwise exempt from production under the Georgia Open Records Act. The County expressly reserves and does not waive any statutory exemptions from disclosure provided by O. C.G.A. §§ 50-18-72, et seq. and other applicable laws.

Sincerely,

Lisa McGlaun

Cc: Members of the Board of Elections
Sherrie Hines, Attorney of Athens-Clarke County
Josh Edwards, Assistant Manager of Unified Government of Athens-Clarke County

From: Joan Rhoden
Sent: Tuesday, December 22, 2020 12:33 AM
To: Charlotte Sosebee
Cc: Aletha Perkins
Subject: [EXT] Poll Watchers Tuesday, December 22

EXTERNAL SENDER: This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Poll Watchers Tuesday, December 22

Lyndon House: Ansley Perno

Miriam Moore: Marcus Bloom

Athens Regional Library: Terry Norwood

ACC Extension: Bernie Ortmann and Naomi Montgomery

ACC Tennis Center: Cathy Ware and Robert Hare

Thank you for your help.

Joan Rhoden

From: Joan Rhoden
Sent: Monday, December 21, 2020 3:48 AM
To: Charlotte Sosebee
Cc:
Subject: [EXT] Poll Watchers - Monday, December 21

EXTERNAL SENDER: This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Charlotte,
Here are our Poll Watchers for Monday, December 21. We may have substitutes for the Tennis Center as the day wears on.

Thanks for your help.

Joan Rhoden

Dates and Times		Lyndon House Arts Center 211 Hoyt St. Athens, GA 30601		Miriam Moore Community Center 410 McKinley Dr. Athens, GA 30605		Athens Regional Library 2025 Baxter Street Athens, GA 30606		ACC EXTENTION 275 Cleveland Rd. Bogart, GA 30622		ACC TENNIS CENTER 4460 Lexington Rd. Athens, GA 30605	
Mon Dec 21: 8am-5pm	Mark DiJohn - Letter emailed	Mark DiJohn - Letter emailed	Mon Dec 21: 10am-5pm	Jennifer Dagnese - Letter emailed	Jennifer Dagnese - Letter emailed	Mon Dec 21: 10am-5pm	Terry Norwood - Letter emailed	Terry Norwood - Letter emailed	Mon Dec 21: 10am-5pm	Charlie Oschack - Letter Emailed	Millicent Zamirowski - Letter emailed

From: Charles Knapper
Sent: Sunday, December 20, 2020 8:33 PM
To: Gordon Rhoden; Jesse Evans; Patricia Till; icook_ieforyou@bellsouth.net; Rocky Raffle
Cc: Charlotte Sosebee; Judd Drake
Subject: [EXT] Re: Notice of Challenge to Eligibility to Vote (Edits)

EXTERNAL SENDER: This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.
Information received.

Charles Knapper

From: Gordon Rhoden <rhodenagency@yahoo.com>
Sent: Sunday, December 20, 2020 5:45 PM
To: Jesse Evans <evans.jesse.accboe@gmail.com>; knapper.patricia.till@accgov.com <patricia.till@accgov.com>; rocky.raffle@accgov.com <rocky.raffle@accgov.com>
Cc: Charlotte Sosebee <charlotte.sosebee@accgov.com>; judd.drake@accgov.com <judd.drake@accgov.com>
Subject: Notice of Challenge to Eligibility to Vote (Edits)

To whom it may concern:

I have discovered two minor errors in the challenge letter sent to the Board on December 16, 2020. The letter mis-states the number of individuals that are listed on the attached spreadsheet. The number in the letter should be 2,948 as is shown on the spreadsheet. The attached signed letter confirms the changes. Also, the letter incorrectly refers to "Cobb County" in one place. Neither of these errors changes the purpose of the letter which is to challenge the eligibility of those individuals listed on the spreadsheet.

Respectfully,

Gordon Rhoden

From: chairman@athensgop.com
Sent: Friday, December 18, 2020 11:48 PM
To: Charlotte Sosebee
Cc: ;Gordon Rhoden
Subject: [EXT] Poll Watchers for Saturday, December 19 (Lyndon House)

EXTERNAL SENDER: This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Charlotte,

Marian Block and her daughter Anna Maria Block will be Poll Watchers at the Lyndon House tomorrow afternoon.

Thanks for all your help.

Joan Rhoden

c. Gordon

From: Jesse Evans <evans.jesse.accboe@gmail.com>
Sent: Friday, December 18, 2020 4:55 PM
To: William Overend
Cc: Charlotte Sosebee; Paula Williams
Subject: Re: Voter Challenges
Attachments: Special Meeting Agenda_20201221_Rhoden.pdf

See the attached agenda.

Jesse Evans, Chair
ACC Board of Elections

On Fri, Dec 18, 2020, 16:18 William Overend <billoverend@icloud.com> wrote:

It is my understanding that in certain other counties, unsubstantiated challenges to the eligibility of certain voters have been made in the past few days.

Please keep me informed if any such challenges are made in Clarke County

Thank you

William M. Overend, Esq. • Attorney at Law

Law Offices of William M. Overend, P.C.

Address: 320 East Clayton Street, Suite 413, Athens, GA 30601

Phone: 706-613-6614

Mobile: 706-202-4600

Email: billoverend@icloud.com

This communication is on behalf of the Democratic Party of Georgia Voter Protection Unit

On Dec 16, 2020, at 2:23 PM, Paula Williams <Paula.Williams@accgov.com> wrote:

Mr. Overend,

On behalf of Director Sosebee, I would like to reply. We are very aware of the number of online requests and we are working every day to process those requests. We have at least 4 and often up to 6 people issuing ballots for the online requests, all of whom are working at least 6 hours a day and most are working 8 to 12 hours each day. We have been working weekends as well. The process involves not only clicking on the online request received to enter into ENet, but also requires 3 labels for each to be printed, 1 for file, 2 attached to envelopes for mailing,

ballots being printed, folded and inserted with return envelopes & instructions into the mailing envelope. Then the mailing envelope has to be sealed and postage applied before we can deliver to the Post Office. However hard we work to get the numbers down, keep in mind that voters are continuing to enter online requests as well. Some of them are entering more than one request which still has to be dealt with also. We have been mailing 600 to 700 plus ballots out every day since Dec. 2nd. 15,571 ballots have been mailed for the January election to date.

Now that we have the online number down significantly, we will pull someone to start processing voted ballots that we have received. Unfortunately there is not enough staff to do both fully. We do have 2 other staff members who are processing applications that have been received in the mail. We have 3 additional staff members who are providing support by putting together the envelope mail out packets we need to mail ballots and assisting with stuffing ballots and getting them in the mail each day as well. Now some other office staff who had been assisting with absentee have now been pulled to assist with early voting sites and to meet voter registration processing deadlines. We also have one part-time staff who had surgery and missed a few days but is now back assisting in a limited but critical capacity. Another staff member has to be out some as well assisting with a family member who required surgery recently.

I realize that people are not very patient and do not understand just how much work there is to be done or how long it takes to get through the process. We are constantly adjusting where we can to make things work better and more efficiently. Each day in these times seems to bring yet another challenge or obstacle, but we are working diligently through it all.

Check your registration/sample ballots/absentee ballot status on My Voter Page at www.MVP.sos.ga.gov.

Paula Williams

Absentee Ballot/Elections Clerk

Athens-Clarke County Elections

155 E Washington St, Athens GA 30601

Mail: PO Box 1828, Athens GA 30603

Phone: 706-613-3150 Fax: 706-613-3840

Website: www.accgov.com/elections

Email: paula.williams@accgov.com

From: William Overend <billoverend@icloud.com>

Sent: Wednesday, December 16, 2020 11:56 AM

To: Charlotte Sosebee <Charlotte.Sosebee@accgov.com>

Cc: Jesse Evans <evans.jesse.acbcoe@gmail.com>

Subject: [EXT] Mail in ballot issues

EXTERNAL SENDER: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Sosebee,

I have still not received any replies from your office regarding my inquiries about the significant backlog of absentee ballot applications in Clarke County.

We have now received reports of additional irregularities regarding the processing of mail in ballots as follows:

"Voter from Clarke County called to say that she voted absentee, took her ballot to a dropbox at the county 12/7 and it is not in MVP. She called county yesterday and was told by an employee that they were told not to post receipt of ballots for TWO weeks! She is concerned that this does not give folks time to make sure there is not problem with her ballot. Her ballot is not showing received in either MVP or ballottrax. Ballot was put in dropbox at county office. Possible concern for multiple voters who would not have enough time to correct a challenged ballot"

Please reply concerning what is going on regarding these two issues.

Thank you.

-wmo

This communication is on behalf of the Democratic Party of Georgia Voter Protection Unit

William M. Overend, Esq. • Attorney at Law

Law Offices of William M. Overend, P.C.

Address: P.O. Box 1401, Athens, Georgia 30603

Phone: 706-613-6614

Mobile: 706-202-4600

Email: billoverend@icloud.com

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Agenda

Special Called Meeting

Athens-Clarke County Board of Elections & Voter Registration

December 21, 2020 @ 4:30 PM

Due to COVID-19 precautions, this is a virtual meeting.

A. Reading of the Board Member Oath of Office (O.C.G.A. § 21-2-70)

"I do swear (or affirm) that I will as a member of the Board of Elections duly attend all ensuing primaries and elections during the continuance thereof, that I will to the best of my ability prevent any fraud, deceit, or abuse in carrying on the same that I will make a true and perfect return of such primaries and elections, and that I will at all times truly, impartially, and faithfully perform my duties in accordance with Georgia laws to the best of my judgement and ability."

B. Adopt Agenda

- C. Public Comment** (Written comment may be emailed to the board members, or delivered to the Athens-Clarke County Board of Elections office before the start of the meeting)

Jesse Evans, Chairperson evans.jesse.accboe@gmail.com
Charles Knapper, Assistant Chairperson knappercq@msn.com
Willa Fambrough, Secretary icook_ieforyou@bellsouth.net
Ann Till, Member panngarland@gmail.com
Rocky Raffle, Member rocky.raffle@accgov.com

D. Gordon Rhoden challenging the eligibility of 16,024 voters on Clarke County's voter list

E. Announcements

F. Adjourn

From: Jesse Evans <evans.jesse.accboe@gmail.com>
Sent: Friday, December 18, 2020 4:55 PM
To: William Overend
Cc: Charlotte Sosebee; Paula Williams
Subject: Re: Voter Challenges
Attachments: Special Meeting Agenda_20201221_Rhoden.pdf

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ACC Board of Elections

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Paula Williams

Absentee Ballot/Elections Clerk

Athens-Clarke County Elections

155 E Washington St, Athens GA 30601

Mail: PO Box 1828, Athens GA 30603

Phone: 706-613-3150 Fax: 706-613-3840

Website: www.accgov.com/elections

Email: paula.williams@accgov.com

From: William Overend <billoverend@icloud.com>

Sent: Wednesday, December 16, 2020 11:56 AM

To: Charlotte Sosebee <Charlotte.Sosebee@accgov.com>

Cc: Jesse Evans <evans.jesse.accboe@gmail.com>

Subject: [EXT] Mail in ballot issues

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Please reply concerning what is going on regarding these two issues.

Thank you.

-wmo

This communication is on behalf of the Democratic Party of Georgia Voter Protection Unit

William M. Overend, Esq. • Attorney at Law

Law Offices of William M. Overend, P.C.

Address: P.O. Box 1401, Athens, Georgia 30603

Phone: 706-613-6614

Mobile: 706-202-4600

Email: billoverend@icloud.com

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December 18, 2020

Marc Erik Elias
MElias@perkinscoie.com
D. +1.202.434.1609
F. +1.202.654.9126

Charlotte Sosebee
Jesse Evans
Charles Knapper
Patricia Till
Willa Fambrough
Rocky Raffle
Athens-Clarke County Board of Elections
P.O. Box 1868
Athens, GA 30603

Dear Athens-Clarke County Elections Officials:

I understand you have received a letter from the Chair of the Athens-Clarke County Republican Party, Gordon Rhoden, challenging the voting eligibility of 16,024 registered voters (the "Targeted Voters"). Mr. Rhoden's purported challenge is not well founded, and any action the County takes to impede the casting of regular ballots by any Targeted Voter would be in violation of both Georgia and federal law. Should the County deny the Targeted Voters their right to cast regular ballots, we will not hesitate to initiate legal action against you to protect lawful Georgia voters against this partisan attack.

Probable cause does not exist to support Mr. Rhoden's challenge under O.C.G.A. § 21-2-230 because the challenge is based on his purported analysis of the United States Postal Service's National Change of Address ("NCOA") database. NCOA "matching" is notoriously unreliable, and on its own cannot provide the basis for a lawful challenge to a voter's eligibility under Georgia law. Moreover, under federal law, the County is prohibited from invalidating voter registration on the basis of this type of broad challenge to residency at this point in the election cycle. This was the conclusion of a Georgia court that addressed a similar challenge to the eligibility of voters in Fulton County in October, a mere month before the November general election. *See Schmitz v. Fulton Cnty. Bd. of Registration & Elections*, 2020CV339337 (Super. Ct. Ga. Oct. 1, 2020). Mr. Rhoden's challenge comes after voters have already begun to cast ballots in the runoff election. The County's entertainment of them would be incredibly inappropriate and, indeed, unlawful.

NCOA data is not an accurate measure of an individual's eligibility to vote. In fact, a federal judge recently recognized that Georgia's prior reliance on this data to remove individuals from the voter rolls likely resulted in mistaken cancellations of lawful, eligible voters. *See Order, Black Voters Matter Fund v. Raffensperger*, No. 1:20-CV-04869-SCJ (N.D. Ga. Dec. 16, 2020), ECF 63 at 30. But even if the NCOA database accurately tracked which individuals have moved—and it does

not—the information still would fail to reliably determine whether individuals are eligible to vote at the address where they are registered.

While the place that a person receives significant mail, such as personal bills, may be evidence of the person's residency for voter registration purposes, O.C.G.A. § 21-2-217(15), both the Election Code and federal law enumerate legitimate reasons that individuals may change their mail address, even out of state, without forfeiting their eligibility to vote. These reasons include: moving for temporary purposes, § 21-2-217(a)(2); moving to engage in government service, § 21-2-217(a)(11); and intending to move without actually moving, § 21-2-217(a)(9). *See also* 52 U.S.C. § 20302(a)(1) (providing for voting by absent uniformed voters and overseas voters); O.C.G.A. § 21-2-216(e) (permitting a citizen who begins residence in another state within 30 days of an election to vote in Georgia if the person is not admitted to vote in the new state).

Thus, any voters who temporarily relocated during the pandemic to be closer to family or care for someone ill, or who moved for a few months to take college classes, or to work a summer job, or for any other number of perfectly valid reasons, may request to receive mail at an address other than where they registered to vote without forfeiting their right to vote in Athens-Clarke County. NCOA data makes no mention of why any individual requested a change of address, which would be critical for any threshold determination of the voter's eligibility. There is simply nothing irregular or unusual about voting while outside of one's voting jurisdiction; indeed, the availability of absentee voting accommodates exactly that. *See* O.C.G.A. § 21-2-380(b).

Precisely because NCOA data is so often unreliable and inaccurate, federal law *prohibits* the removal of individuals from voter registration lists unless strict precautions are followed. And what is forbidden in the registration context—restricting the right to vote based on alleged change-of-address information alone—certainly cannot supply probable cause for a challenge under O.C.G.A. § 21-2-230. Section 8(d) of the National Voter Registration Act (“NVRA”) expressly provides that “[a] State *shall not remove* the name of a registrant from the official list of eligible voters in elections for Federal office on the ground that the registrant changed residence *unless*” it follows the procedures set out therein, which require that: (1) the State receive written confirmation from the voter of change of address, or (2) the voter fails to respond to a postcard notice, and also fails to vote in at least two subsequent federal general election cycles. 52 U.S.C.A. § 20507(d) (emphasis added). Because Mr. Rhoden has not identified a single voter on his list who has confirmed a change of address in writing to the State or received official notice from the State and failed to vote in two subsequent general elections, there is no basis for impeding their right to vote.

Section 8(c) of the NVRA provides an additional, independent prohibition on purging the 16,024 Targeted Voters this close to the January 5 run-off elections for U.S. Senate. Section 8(c) requires that “[a] State shall complete, not later than 90 days prior to the date of a primary or general election for Federal office, any program the purpose of which is to systematically remove the names of ineligible voters from the official lists of eligible voters.” 52 U.S.C.A. § 20507(c)(2)(A).

This section of the NVRA has been interpreted to apply not just to regular voter list maintenance programs, but also to voter challenges like those sought here. For example, a North Carolina federal court recently reviewed voter challenges across four counties and found that, where a county's removal of voters "lack[s] individualized inquiry," rests on "generic evidence" such as mass mailings, and occurs within 90 days of a federal election, it violates Section 8(c) of the NVRA. *N.C. State Conf. of NAACP v. Bipartisan Bd. of Elections & Ethics Enf't*, 1:16CV1274, 2018 WL 3748172, at *6-*7 (M.D.N.C. Aug. 7, 2018).

A Georgia court has already reached an identical conclusion. *See Schmitz* (denying as not required by Georgia law and prohibited by the NVRA a request for immediate hearings on mass registration and voter challenges brought on the basis of alleged change-of-residency data). So have other federal courts. *See Mont. Democratic Party v. Eaton*, 581 F. Supp. 2d 1077, 1082 (D. Mont. 2008) ("Because the federal [NVRA] makes it illegal to deny an elector his or her vote based on a change of address, subject to limited exceptions not implicated here, if Montana county election officials are required, or even allowed, to compel an elector challenged on the basis of change-of-address information to prove anything, there is a violation of federal law."). For this very reason, rather than litigate a challenge case, Hancock County recently entered into a consent decree acknowledging that the NVRA governed its removal of several voters from the voter rolls pursuant to a challenge. *Ga. State Conf. of NAACP v. Hancock Cnty. Bd. of Elections & Registration*, 5:15-CV-00414 (CAR), 2018 WL 1583160, at *1 (M.D. Ga. Mar. 30, 2018) (granting joint consent decree requiring Hancock County to follow NVRA procedures for residency-based voter removal and establishing five-year monitoring).

Because Athens-Clarke County is prohibited by the NVRA from preventing the Targeted Voters from voting, Mr. Rhoden's efforts amount to a flagrant attempt at voter intimidation that is itself precluded by federal law. *See* 18 U.S.C. § 594 (criminalizing acts intended to intimidate voters and dissuade them from voting in a federal election); 52 U.S.C. § 20511(1) (criminalizing acts intended to intimidate any person for attempting to register to vote in a federal election); 52 U.S.C. § 10307(b) (prohibiting any person from intimidating voters in participating in election, whether or not such intimidation was intended). Athens-Clarke County elections officials must not be complicit in this effort.

I respectfully request that you reject the challenge to 16,024 registered voters on the basis of alleged change-of-residency and permit these voters to cast a regular ballot in the upcoming run-

December 18, 2020
Page 4

off elections. To avoid costly and unnecessary litigation, I ask that you take this action immediately.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'ME', with a stylized flourish extending to the right.

Marc Erik Elias

MEE

From: Goldin, Delia (Perkins Coie) <DGoldin@perkinscoie.com>
Sent: Friday, December 18, 2020 1:33 PM
To: Charlotte Sosebee;evans.jesse.accboe@gmail.com;knappercq@msn.com;Patricia Till;icook_ieforyou@bellsouth.net;Rocky Raffle
Cc: Judd Drake;Lopez, Jacquelyn K. (Perkins Coie);Nkwonta, Uzoma (Perkins Coie)
Subject: [EXT] NVRA Letter from Marc Elias (Clarke County)
Attachments: 2020-12-18 Clarke County NVRA Letter.pdf

Follow Up Flag: Flag for follow up
Flag Status: Flagged

EXTERNAL SENDER: This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Please find the attached letter from Marc Elias. A paper copy was also sent via expedited mail.

Thank you,

Delia Goldin | Perkins Coie LLP
PRACTICE ASSISTANT/SCHEDULER
She/her/hers
D. +1202.661.5827
E. DGoldin@perkinscoie.com

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

From: Jesse Evans <evans.jesse.accboe@gmail.com>
Sent: Friday, December 18, 2020 7:29 AM
To: WILLA FAMBROUGH; Charles Knapper; Rocky Raffle; Ann Till-Garland
Cc: Charlotte Sosebee; Pam Long; Lisa McGlaun; Judd Drake; Blaine Williams
Subject: [EXT] Special Meeting on Monday, 12/21/2020
Attachments: Special Meeting Agenda_20201221_Rhoden.pdf

Follow Up Flag: Flag for follow up
Flag Status: Flagged

EXTERNAL SENDER: This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Athens-Clarke County Board of Elections,

I'm emailing to request a Special Meeting on Monday, 12/21/2020. The meeting will be at 4:30pm and will take place virtually due to COVID-19 precautions.

Please see attached the agenda that Secretary Fambrough and I have agreed to for this Special Meeting.

We need two more Board Members to agree to call this Special Meeting. Please "reply all" to indicate that you agree or do not agree to calling this meeting.

Thank you.

Sincerely and Respectfully,

Jesse Evans, Chair
ACC Board of Elections

From: Aletha Perkins
Sent: Tuesday, December 15, 2020 8:25 AM
To: Joan Rhoden;Charlotte Sosebee
Cc: Gordon Rhoden
Subject: RE: [EXT] Chad Lowery Poll Watcher Dec 15 PM - Lyndon House

Thank you!

From: Joan Rhoden <joaneanna@gmail.com>
Sent: Monday, December 14, 2020 10:50 PM
To: Charlotte Sosebee <Charlotte.Sosebee@accgov.com>
Cc: Aletha Perkins <Aletha.Perkins@accgov.com>; Gordon Rhoden <rhodenagency@yahoo.com>
Subject: [EXT] Chad Lowery Poll Watcher Dec 15 PM - Lyndon House

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Charlotte,

Chad Lowery will be Poll Watcher at Lyndon House tomorrow afternoon with Kathleen .McCroskey tomorrow, December 15. Chad will have his credential letter with him.

Thanks for your help.

Joan Rhoden

c. Gordon

From: Joan Rhoden
Sent: Monday, December 14, 2020 10:50 PM
To: Charlotte Sosebee
Cc: Gordon Rhoden
Subject: [EXT] Chad Lowery Poll Watcher Dec 15 PM - Lyndon House
Attachments: POLL WATCHER Advance Voting letter to volunteer 2020.pdf

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Do not click links or open attachments unless you recognize the sender and know the content is safe.

Charlotte,

Chad Lowery will be Poll Watcher at Lyndon House tomorrow afternoon with Kathleen .McCroskey tomorrow, December 15. Chad will have his credential letter with him.

Thanks for your help.

Joan Rhoden

c. Gordon



CLARKE COUNTY REPUBLICAN PARTY

December 7, 2020

Chad Lowery
765 Tallassee Road
Athens, GA30606

SENT BY EMAIL

Dear Chad,

Thank you for agreeing to be a Poll Watcher during the Advance Voting Period for the January 5th Senate Runoff Election which runs from December 14th through December 31st. This letter serves as proper notice, pursuant to O.C.G.A. § 21-2-408(b)(3) and State Election Board Rule 183-1-13-.06, to serve as an Advance Voting Poll Watcher at the following polling locations in Clarke County Georgia:

Advance Voting Polling Location(s): Credentialed for ALL

A copy of this letter will be provided to the County Elections Superintendent and Chief Registrar at least three days prior to the advance voting period, as required by O.C.G.A. § 21-2-408(b)(3) and State Election Board Rule 183-1-13-.03.

Gordon Rhoden
Chairman

Chelsea Mathews
Secretary

P.O. BOX 1911 ATHENS, GA 30603 (706) 546-4280

From: chairman@athensgop.com
Sent: Sunday, December 13, 2020 7:14 PM
To: Charlotte Sosebee
Cc: :Gordon Rhoden;Gordon Rhoden
Subject: [EXT] Fwd: Credential Letter for Poll Watchers - Phillips
Attachments: POLL WATCHER Advance Voting letter to volunteer 2020.pdf

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Charlotte,

Susan Phillips will be working with **Linda Krotki** at the Lyndon house from 8am - Noon tomorrow, December 14. She will have a copy of her credential letter.

Thanks for your help.

Joan Rhoden
706.714.2073

c. Gordon

----- Forwarded message -----

From: **Joan Rhoden** <
Date: Wed, Dec 9, 2020 at 5:59 PM
Subject: Credential Letter for Poll Watchers - Phillips
To: <smhhensley@yahoo.com>

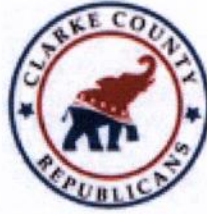
Ref. Credential Letter for Poll Watchers - Phillips

Susan,

Please take a copy of this letter with you to every location where you will serve as a Poll Watcher for Advance Voting.

Thank you for volunteering.

Joan Rhoden
Clarke County Republican Party
706.714.2073



CLARKE COUNTY REPUBLICAN PARTY

December 7, 2020

Susan Phillips
251 Concord Drive
Watkinsville, GA 30688

SENT BY EMAIL

Dear Susan,

Thank you for agreeing to be a Poll Watcher during the Advance Voting Period for the January 5th Senate Runoff Election which runs from December 14th through December 31st. This letter serves as proper notice, pursuant to O.C.G.A. § 21-2-408(b)(3) and State Election Board Rule 183-1-13-.06, to serve as an Advance Voting Poll Watcher at the following polling locations in Clarke County Georgia:

Advance Voting Polling Location(s): Credentialed for ALL

A copy of this letter will be provided to the County Elections Superintendent and Chief Registrar at least three days prior to the advance voting period, as required by O.C.G.A. § 21-2-408(b)(3) and State Election Board Rule 183-1-13-.03.

Gordon Rhoden
Chairman

Chelsea Mathews
Secretary

P.O. BOX 1911 ATHENS, GA 30603 (706) 546-4280

From: Joan Rhoden
Sent: Friday, December 11, 2020 3:52 PM
To: Charlotte Sosebee
Cc: Ann Till Garland; Gordon Rhoden
Subject: [EXT] Poll Watcher List (Week 1) ACCGOP
Attachments: Poll Watchers Location Week 1 ACCGOP.xlsx

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Charlotte,

Attached is the list of the people we have scheduled currently for WEEK 1 of Advance Voting. Let me know if you need any other information or in a different format.

As we discussed, these Poll Watchers have been told they will pick up their name badges/credentials at their specified polling location.

Thank you for all you do. Prayers for a safe and successful runoff.

Joan Rhoden

c. Gordon Rhoden
Ann Till

ACCGOP AVANCE VOTING WEEK 1

ADVANCED VOTING WEEKS 1-3	Lyndon House Arts Center 211 Hoyt St. Athens, GA 30601				Miriam Moore Community Center 410 McKinley Dr. Athens, GA 30605		
	CLARKE GOP	CLARKE GOP	AM	PM	CLARKE GOP	AM	PM
DECEMBER R 14 - 18			2 Watchers Per Session	2 Watchers Per Session		2 Watchers Per Session	2 Watchers Per Session
		Mon Dec 14: 8am-5pm	Linda Krotki - Letter emailed	Roberta Schacher - Letter emailed		Mon Dec 14: 8am-5pm	Ross Watson - Letter emailed Cathy Ware - Letter emailed
		Tues Dec 15: 8am- 5pm	Kathleen McCroskey - Letter Emailed	Kathleen McCroskey - Letter Emailed		Tues Dec 15: 8am- 5pm	Robin Osborn - Letter emailed Cathy Ware - Letter emailed
		Wed Dec 16: 8am- 7pm	Vickie Wallace - Letter emailed	Ross Watson - Letter emailed		Wed Dec 16: 8am- 7pm	Robin Osborn - Letter emailed McCroskey - Letter Emailed
		Thur Dec 17: 8am- 7pm	Susan Phillips - Letter Emailed	Kemper Higgins - Letter emailed		Thur Dec 17: 8am- 7pm	Holly Ransom - Letter emailed Marcus Bloom - Letter Emailed
		Fri Dec 18: 8am-7pm	Kemper Higgins - Letter emailed	Gabe Mesriah - Letter emailed		Fri Dec 18: 8am-7pm	Pam Shropshire - Letter emailed Pam Shropshire - Letter emailed

From: Joan Rhoden
Sent: Thursday, December 10, 2020 9:38 PM
To: Charlotte Sosebee
Cc: Gordon Rhoden
Subject: [EXT] Poll Watchers Clarke GOP - O.C.G.A 21-2-413(f) 2 GOP Poll Watchers
Attachments: Poll Watcher Letter GOP 2 Watchers Per Location.pdf

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Charlotte,

In order to be able to fill each session with the 2 Republican POLL WATCHERS at each polling location in accordance with O.C.G.A 21-2-413(f), please add the following names to the credentialing process.

Please let me know that you have received these additions. Thanks for your help.

Merry Christmas!

Joan Rhoden
Clarke County Republican Party

c. Gordon Rhoden

Clarke County Republican Party



December 7, 2020

To Superintendent of Elections Clarke County

Ref. Poll Watcher during the Advance Voting Period for the January 5th Senate Runoff Election which runs from December 14th through December 31st.

This letter serves as proper notice, pursuant to O.C.G.A. § 21-2-408(b)(3) and State Election Board Rule 183-1-13-.06, to serve as an Advance Voting poll watcher at the following polling locations in Clarke County Georgia. A copy of this letter will be provided to the County Elections Superintendent and Chief Registrar at least three days prior to the advance voting period, as required by O.C.G.A. § 21-2-408(b)(3) and State Election Board Rule 183-1-13-.03

Chairman, Clarke County Republican Party

Secretary, Clarke County Republican Party

Submitted by Clarke County Republican Party Chair to Clarke County Board of Elections
December 7, 2020.

POLL WATCHERS:

Naomi Montgomery 1050 Fairway Ridge Circle Greensboro, GA 30642
Joan Rhoden 340 Heather Cove Athens, GA 30606
Caroline Rykard 505 Riverbend Pkwy Athens 30605
Judith Sommer 17 Braeburn Drive Athens 30601
Douglas Spadaro 379 Westview Drive Athens 30606
Amanda Upshaw 481 East Paces Ferry Rd NE, Atlanta, GA 30305

From: Joan Rhoden
Sent: Thursday, December 10, 2020 1:47 PM
To: Charlotte Sosebee
Cc: Gordon Rhoden
Subject: [EXT] Poll Watcher List Addendum - CLARKE COUNTY GOP
Attachments: Poll Watcher Letter GOP Staff LIST_Brooke R.pdf

EXTERNAL SENDER: This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Charlotte Sosebee ref. Poll Watchers - Advance Voting Dec 14-31

Charlotte,

As we discussed, I have attached the addendum list of POLL WATCHERS credentialed by the Clarke County GOP. Please let me know that you have received this list.

Thank you for your assistance.

Merry Christmas!

Joan Rhoden
2nd Vice Chair
Clarke County Republican Party
706.714.2073

c. Gordon Rhoden

Clarke County Republican Party



December 7, 2020

To Superintendent of Elections Clarke County

Ref. Poll Watcher during the Advance Voting Period for the January 5th Senate Runoff Election which runs from December 14th through December 31st.

This letter serves as proper notice, pursuant to O.C.G.A. § 21-2-408(b)(3) and State Election Board Rule 183-1-13-.06, to serve as an Advance Voting poll watcher at the following polling locations in Clarke County Georgia. A copy of this letter will be provided to the County Elections Superintendent and Chief Registrar at least three days prior to the advance voting period, as required by O.C.G.A. § 21-2-408(b)(3) and State Election Board Rule 183-1-13-.03

Chairman, Clarke County Republican Party

Secretary, Clarke County Republican Party

Submitted by Clarke County Republican Party Chair to Clarke County Board of Elections
December 7, 2020.

POLL WATCHERS:

Mark Bonnoitt 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Trenton Frank 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Kenneth Garrett 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Brett Harris 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Austin Hickman 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Paul Mitchell 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Joe Molnar 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606

Matt Pettis 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Crystal Pewitt 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Chris Poulton 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Leighton Smith (Gray) 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Jarvaris Strachan 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Sam Arena 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Clayton Faller 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Khushi Patel 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606
Danielle Robinson 2470 Daniels Bridge Rd. Suite 141, Bldg.100 Athens, GA 30606

From: Richard Zimdars
Sent: Monday, December 21, 2020 12:54 PM
To: evans.jesse.accboe@gmail.com;knapperqcq@msn.com;Patricia
Till;icook_ieforyou@bellsouth.net;Rocky Raffle
Subject: [EXT] Rhoden's frivolous lawsuit: toss it

EXTERNAL SENDER: This email originated from outside of the organization.
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To: Athens Clarke Co. Board of elections

From: Richard and Paula Zimdars
181 Clyde Road - 30605 - 706-354-8381

The challenge to attempt to disenfranchise 16,024 A/C voters should have been brought in a timely fashion well before the November 2020 election. Submitting a challenge 18 days before an election during a pandemic at the height of the holiday season?? Such an action will not bear legal scrutiny.

Unfortunately, the challenge emanates from a family that has already brought national disgrace to Athens/Clarke County. The bigotry of Joan Rhoden is permanently on display at this link. Please post it the A/C Democratic and Republican party websites:
<https://www.projectq.us/athens-gop-leader-goes-on-anti-gay-rant-on-pulse-anniversary/>

Please reject this challenge now. If it can be followed up with legal action against Mr. Rhoden, do so. The A/C Repub Party should consider asking Mr. and Mrs. Rhoden to step down. Insulting every board of election member and volunteer poll worker and intentionally contributing to the myth of election fraud in Georgia! Is that the Rhoden's idea of a Christmas gift to their fellow Athenians?

From: Charles Knapper <knapperqc@msn.com>
Sent: Sunday, December 20, 2020 8:33 PM
To: Gordon Rhoden; Jesse Evans; Patricia Till; icook_ieforyou@bellsouth.net; Rocky Raffle
Cc: Charlotte Sosebee; Judd Drake
Subject: [EXT] Re: Notice of Challenge to Eligibility to Vote (Edits)

EXTERNAL SENDER: This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.
Information received.

Charles Knapper

From: Gordon Rhoden <rhodenagency@yahoo.com>
Sent: Sunday, December 20, 2020 5:45 PM
To: Jesse Evans <evans.jesse.accboe@gmail.com>; knapperqc@msn.com <knapperqc@msn.com>;
patricia.till@accgov.com <patricia.till@accgov.com>; icook_ieforyou@bellsouth.net <icook_ieforyou@bellsouth.net>;
rocky.raffle@accgov.com <rocky.raffle@accgov.com>
Cc: Charlotte Sosebee <charlotte.sosebee@accgov.com>; judd.drake@accgov.com <judd.drake@accgov.com>
Subject: Notice of Challenge to Eligibility to Vote (Edits)

To whom it may concern:

I have discovered two minor errors in the challenge letter sent to the Board on December 16, 2020. The letter mis-states the number of individuals that are listed on the attached spreadsheet. The number in the letter should be 2,948 as is shown on the spreadsheet. The attached signed letter confirms the changes. Also, the letter incorrectly refers to "Cobb County" in one place. Neither of these errors changes the purpose of the letter which is to challenge the eligibility of those individuals listed on the spreadsheet.

Respectfully,

Gordon Rhoden



December 21, 2020

VIA ELECTRONIC MAIL

Charlotte Sosebee
Director of Elections and Voter Registration
155 East Washington Street
Athens, GA 30601
charlotte.sosebee@accgov.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 makes the following request for records.

Requested Records

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

1. All email communications (including emails, complete email chains, email attachments, calendar invitations, and attachments thereto), text messages, and messages on messaging platforms (such as The Buzz, Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp) between any of the county Board of Elections officials listed in Column A below and any of the Secretary of State officials listed below in Column B.
2. All records reflecting the substance of any oral communications (including any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, materials exchanged before, during, or following any oral communications, or any other related materials) between any of the county Board of Elections officials listed in Column A below and any of the Secretary of State officials listed below in Column B.

Column A: Athens-Clarke County Elections and Registration & Board of Elections Officials	Column B: Office of the Secretary of State
i. Director of Elections and Voter Registration Charlotte Sosebee ii. Elections Assistant Pamela Long iii. Elections Assistant Lisa McGlaun iv. Absentee Ballot Clerk Paula Williams v. Chairperson of the Board of Elections Jesse Evans	a. Any official in the office of the Secretary of State of Georgia (including anyone communicating from an email address ending in @sos.ga.gov) b. Jordan Fuchs, Deputy Secretary of State (including



1030 15th Street NW, Suite B255, Washington, DC 20005 | AmericanOversight.org

vi.	Vice Chairperson Charles Knapper	but not limited to at
vii.	Board Secretary Willa J. Fambrough	jordyfuchs212@gmail.com)
viii.	Board Member Patricia A. Till	c. Gabriel Sterling, Voting System
ix.	Board Member Rocky Raffle	Implementation Manager
		(including but not limited to at
		sterlinginnovative@gmail.com)

Please provide all responsive records from December 10, 2020, to 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 seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. No category of material should be omitted from search, collection, and production.

In addition, 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

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,



Austin R. Evers
Executive Director
American Oversight

¹ American Oversight currently has approximately 15,600 page likes on Facebook and 106,100 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight/> (last visited Dec. 18, 2020); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited Dec. 18, 2020).

From: Harris, Axiver <aharris@sos.ga.gov>
Sent: Friday, December 18, 2020 2:27 PM
To: Harris, Axiver
Subject: [EXT] On Firefly

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[2:25 PM] Harvey, Chris

I just posted this message on Firefly:

Many counties are getting voter challenges filed under O.C.G.A. 21-2-230.

OCGA 21-2-230(b) requires that the BOE, "shall immediately consider such challenge(s) and consider whether probable cause exists to sustain such challenge(s)."

The steps are listing in the code section, and I strongly encourage you to review this code section with your board and attorney should you get such a challenge.

Axiver Harris
Liaison
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