



ALAN WILSON  
ATTORNEY GENERAL

May 7, 2021

**VIA EMAIL**

Ms. Khahilia Shaw  
[records@americanoversight.org](mailto:records@americanoversight.org)

RE: Freedom of Information Act (“FOIA”) Request

Dear Ms. Shaw:

This Office received your FOIA request dated March 18, 2021, which seeks:

1. All email communications (including emails, complete email chains, email attachments, calendar invitations, and calendar attachments) between (a) any of the Attorney General’s Office officials listed below and (b) any of the external parties listed below.

South Carolina Attorney General Officials:

- i. Alan Wilson, Attorney General, or anyone communicating on that official’s behalf (such as an assistant or scheduler)
- ii. Anyone serving as Chief of Staff to Attorney General Wilson
- iii. Robert D. Cook, Solicitor General
- iv. James Emory Smith, Deputy Solicitor General
- v. Robert Kittle, Communications Director

External Parties:

- vi. Kris Kobach (including, but not limited to, at the email addresses [kkobach@gmail.com](mailto:kkobach@gmail.com) or [kris@kriskobach.com](mailto:kris@kriskobach.com))
- vii. Lawrence Joseph (including, but not limited to, at the email addresses [ljoseph@larryjoseph.com](mailto:ljoseph@larryjoseph.com) or [lj@larryjoseph.com](mailto:lj@larryjoseph.com))
- viii. Mark Martin (including, but not limited to, at the email address [mmartin@regent.edu](mailto:mmartin@regent.edu))

2. All text messages or communications on messaging applications similar in form to text messages (including, but not limited to, Signal, WhatsApp, Facebook Messenger, and Twitter direct messages)

between (a) any of the Attorney General's Office officials listed above and (b) any of the external parties listed above.

3. All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) sent by any of the Attorney General's Office officials listed above to any email address ending in .com, .net, .org, .mail, or .edu, containing any of the following key terms:

Key Terms:

- a. "Texas v. Pennsylvania"
- b. "TX v. PA"
- c. "592 U.S."
- d. separation-of-powers
- e. "separation of powers"
- f. electors
- g. "Article II"
- h. "fraud and abuse"
- i. "non-legislative actors"
- j. amicus
- k. amici
- l. unconstitutional
- m. "voting by mail"
- n. "vote by mail"
- o. Paxton
- p. "safe harbor"
- q. Kobach
- r. "Larry Joseph"
- s. "Lawrence Joseph"
- t. "Mark Martin"

Repeated and voluminous searches of our files use valuable Office resources. This Office is permitted to charge reasonable fees not to exceed our actual costs in performing these searches. This Office charges \$19.00 per hour of staff time required to search, retrieve, and redact public records responsive to a request.

On April 1, 2021, in accordance with § 30-4-30(B), the Office required a deposit of \$50.00 from you. The Office received your deposit on April 13, 2021.

The Office has searched its records and assembled all of the public records responsive to your request. The Office spent over three hours searching for, retrieving, and redacting these records. Therefore, the Office's actual costs are over \$50.00; however, we are electing not to charge you further for this request.

All of the responsive public records are attached. Please be advised that certain documents are exempt from disclosure pursuant to S.C. Code Ann. § 30-4-40(a)(7).

Sincerely yours,

A handwritten signature in blue ink, appearing to read "L. David Leggett". The signature is fluid and cursive, with a large initial "L" and a long, sweeping underline.

L. David Leggett  
Assistant Attorney General

## David Leggett

---

**From:** R. K. Merting <[robert@rkmerting.com](mailto:robert@rkmerting.com)>  
**Sent:** Thursday, October 29, 2020 2:04 PM  
**To:** Emory Smith  
**Subject:** Re: Pinckney et al. vs. Peeler et al.

Emory,

I have it on the calendar. Looking forward to it.

Sincerely,

Robert K. Merting  
Attorney at Law  
501 Furman Rd.  
Suite W  
Greenville, SC 29609  
1-843-830-5227

w: [rkmerting.com](http://rkmerting.com) e: [robert@rkmerting.com](mailto:robert@rkmerting.com)  
[Newsletter signup](#)

On Oct 29, 2020, at 10:58 AM, Emory Smith <[ESmith@scag.gov](mailto:ESmith@scag.gov)> wrote:

10 am ok?

Emory

---

**From:** R. K. Merting <[robert@rkmerting.com](mailto:robert@rkmerting.com)>  
**Sent:** Thursday, October 29, 2020 7:26 AM  
**To:** Emory Smith <[ESmith@scag.gov](mailto:ESmith@scag.gov)>  
**Subject:** Re: Pinckney et al. vs. Peeler et al.

Emory,

Friday is perfect. What time suits you?

Sincerely,

Robert K. Merting  
Attorney at Law  
501 Furman Rd.  
Suite W  
Greenville, SC 29609  
1-843-830-5227

w: [rkmerting.com](http://rkmerting.com) e: [robert@rkmerting.com](mailto:robert@rkmerting.com)  
[Newsletter signup](#)

On Oct 29, 2020, at 6:48 AM, Emory Smith <[ESmith@scag.gov](mailto:ESmith@scag.gov)> wrote:

Thursday or Friday? I am somewhat tied up today with conference calls and an appointment but could do it at 4. Friday would be better.

Emory

---

**From:** R. K. Merting <[robert@rkmerting.com](mailto:robert@rkmerting.com)>  
**Sent:** Thursday, October 29, 2020 12:10 AM  
**To:** Emory Smith  
**Subject:** Re: Pinckney et al. vs. Peeler et al.

Emory,

I'm just now catching my breath. Do you have any availability tomorrow?

Sincerely,

Robert K. Merting  
Attorney at Law  
501 Furman Rd.  
Suite W  
Greenville, SC 29609  
1-843-830-5227

w: [rkmerting.com](http://rkmerting.com) e: [robert@rkmerting.com](mailto:robert@rkmerting.com)

<image001.jpg>

Robert K. Merting – Attorney at Law – Trust  
Your Guns: A firearms, business, and ITAR  
knowledgeable law practice

[rkmerting.com](http://rkmerting.com)

og:image

[Newsletter signup](#)

On Oct 27, 2020, at 9:23 AM, Emory Smith <[ESmith@scag.gov](mailto:ESmith@scag.gov)> wrote:

Please call me Emory.

I will be happy to talk to you, but have deadlines I am working on today. Later this pm or tomorrow would be better except that I have a 10:30 am WebEx status conf. Wed.

FYI, attached is a letter return that Bob Cook of this Office filed for the State.

Emory

J. Emory Smith, Jr.  
Deputy Solicitor General  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211  
803-734-3642 Direct

---

**From:** R. K. Merting <[robert@rkmerting.com](mailto:robert@rkmerting.com)>  
**Sent:** Tuesday, October 27, 2020 1:10 AM  
**To:** Emory Smith <[ESmith@scag.gov](mailto:ESmith@scag.gov)>  
**Subject:** Pinckney et al. vs. Peeler et al.

Mr. Smith,

In reading Plaintiff's brief in the above matter I noticed that you are one of the counsel for the Attorney General. I have been retained to file an amicus brief in the case supporting the Heritage Act, and I would enjoy an opportunity to discuss the matter with you and see if there is any particular area that will be beneficial to focus upon. Would you have the time and willingness for a short discussion?

Sincerely,

Robert K. Merting  
Attorney at Law  
501 Furman Rd.  
Suite W

Greenville, SC 29609  
1-843-830-5227

w: [rkmerting.com](http://rkmerting.com) e: [robert@rkmerting.com](mailto:robert@rkmerting.com)  
[Newsletter signup](#)

<Pinckney - Letter of State to Clerk (02351342xD2C78).PDF>

## David Leggett

---

**From:** Matthew T. Richardson <MRichardson@wyche.com>  
**Sent:** Monday, December 21, 2020 11:21 AM  
**To:** Emory Smith  
**Cc:** Bob Cook  
**Subject:** Re: Pinckney v. Peeler

Thank you both very much, and merry Christmas

On Dec 21, 2020, at 11:18 AM, Emory Smith <esmith@scag.gov> wrote:

And here is the COS. I will now efile the brief and certificate.

Emory

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**From:** Emory Smith  
**Sent:** Monday, December 21, 2020 11:14 AM  
**To:** 'BWright@burr.com' <BWright@burr.com>; 'GLambert@burr.com' <GLambert@burr.com>; 'gmalloy@bellsouth.net' <gmalloy@bellsouth.net>; 'mrichardson@wyche.com' <mrichardson@wyche.com>; 'KenMoffitt@scsenate.gov' <KenMoffitt@scsenate.gov>; 'JohnHazzard@scsenate.gov' <JohnHazzard@scsenate.gov>; 'SaraParrish@scsenate.gov' <SaraParrish@scsenate.gov>; 'PatrickDennis@schouse.gov' <PatrickDennis@schouse.gov>; 'HaleyMottel@schouse.gov' <HaleyMottel@schouse.gov>; 'TLimehouse@governor.sc.gov' <TLimehouse@governor.sc.gov>; 'MFair@governor.sc.gov' <MFair@governor.sc.gov>  
**Subject:** Pinckney v. Peeler

Counsel:

Attached is the amicus brief of the Attorney General that I hereby serve upon you. Best wishes to all of you for very happy holidays.

Emory

J. Emory Smith, Jr.  
Deputy Solicitor General  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211  
803-734-3642 Direct

<Certificate of Service of Amicus Brief w- email attached (02453464xD2C78).PDF>

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This e-mail may contain privileged or confidential information.  
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(ii) destroy any copies that may have been made

(iii) do not use, copy or distribute the contents in any form  
(iv) notify the sender by return e-mail or call.  
No privilege is waived by inadvertent transmission.  
Thank you.

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## David Leggett

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**From:** Wright, Brad <BWright@burr.com>  
**Sent:** Monday, December 21, 2020 3:03 PM  
**To:** Emory Smith  
**Cc:** Bob Cook  
**Subject:** RE: Pinckney v. Peeler

It is well written. Happy Holidays to both of you!



AL • DE • FL • GA  
MS • NC • SC • TN

Brad Wright • *Partner*

---

1221 Main St. , Suite 1800, Columbia, South Carolina 29201

main 803-799-9800 • fax 803-753-3278

[bwright@burr.com](mailto:bwright@burr.com) • [www.burr.com](http://www.burr.com)

360 Attorneys. 19 Offices. 1 Firm. Southeastern Strong.

---

The information contained in this email is intended for the individual or entity above. If you are not the intended recipient, please do not read, copy, use, forward or disclose this communication to others; also, please notify the sender by replying to this message, and then delete this message from your system. Thank you.

**From:** Emory Smith <ESmith@scag.gov>  
**Sent:** Monday, December 21, 2020 2:43 PM  
**To:** Wright, Brad <BWright@burr.com>  
**Cc:** Bob Cook <RCook@scag.gov>  
**Subject:** RE: Pinckney v. Peeler

[EXTERNAL EMAIL]

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Thanks, Brad. Bob wrote it.

Merry Christmas to you and your family.

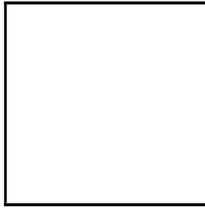
Emory

---

**From:** Wright, Brad <BWright@burr.com>  
**Sent:** Monday, December 21, 2020 2:36 PM  
**To:** Emory Smith <ESmith@scag.gov>  
**Subject:** RE: Pinckney v. Peeler

Thanks, Emory. Just read the brief and it is very good. Happy Holidays!

Brad



AL • DE • FL • GA  
MS • NC • SC • TN

Brad Wright • *Partner*

1221 Main St. , Suite 1800, Columbia, South Carolina 29201

main 803-799-9800 • fax 803-753-3278

[bwright@burr.com](mailto:bwright@burr.com) • [www.burr.com](http://www.burr.com)

360 Attorneys. 19 Offices. 1 Firm. Southeastern Strong.

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**From:** Emory Smith <[ESmith@scag.gov](mailto:ESmith@scag.gov)>

**Sent:** Monday, December 21, 2020 11:14 AM

**To:** Wright, Brad <[BWright@burr.com](mailto:BWright@burr.com)>; Lambert, Grayson <[GLambert@burr.com](mailto:GLambert@burr.com)>; [gmalloy@bellsouth.net](mailto:gmalloy@bellsouth.net);  
'mrichardson@wyche.com' <[mrichardson@wyche.com](mailto:mrichardson@wyche.com)>; [KenMoffitt@scsenate.gov](mailto:KenMoffitt@scsenate.gov); [JohnHazard@scsenate.gov](mailto:JohnHazard@scsenate.gov);  
[SaraParrish@scsenate.gov](mailto:SaraParrish@scsenate.gov); [PatrickDennis@schoose.gov](mailto:PatrickDennis@schoose.gov); [HaleyMottel@schoose.gov](mailto:HaleyMottel@schoose.gov); [TLimehouse@governor.sc.gov](mailto:TLimehouse@governor.sc.gov);  
[MFair@governor.sc.gov](mailto:MFair@governor.sc.gov)

**Subject:** Pinckney v. Peeler

[EXTERNAL EMAIL]

---

Counsel:

Attached is the amicus brief of the Attorney General that I hereby serve upon you. Best wishes to all of you for very happy holidays.

Emory

J. Emory Smith, Jr.  
Deputy Solicitor General  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211  
803-734-3642 Direct

**From:** [Robert Kittle](#)  
**To:** [rkittle@bellsouth.net](mailto:rkittle@bellsouth.net)  
**Subject:** Final draft  
**Date:** Friday, December 11, 2020 3:57:00 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Why I joined the election lawsuit

By Alan Wilson

Many academics, editorial writers, reporters and partisan thinkers live in a world where you either agree with them or you are demonized. I have been harshly criticized by some, while being praised by others, for daring to challenge the recent electoral process. I would like to address the attacks but first I would like to explain my position with a simple analogy.

Consider an example where two football teams are playing for the national championship and in the final seconds of the game one team scores the game-winning touchdown. As everyone on the winning team celebrates the win, a camera angle of the touchdown shows that the player who ran the ball into the end zone might have stepped out of bounds before crossing the line.

The coach of the presumptive losing team challenges the last play by asking the referee for a review. The reason for this challenge is because if it is determined that the player stepped out of bounds before scoring then the rules were violated and the touchdown is not legitimate.

Just like football, elections have rules that must be followed to the letter before a winner can be declared. In this particular case, the rules for federal elections are given to us in the U.S. Constitution and those rules basically say that laws dictating the time, location and manner of elections should be determined by state legislatures and no one else.

A number of state officials from other states – well-intentioned or not – unilaterally rewrote the laws through executive fiat which is, arguably, a violation of the ‘electors clause’ of the U.S. Constitution. For example, in one state the state legislature passed a law that said ballots must be received postmarked by 8:00 p.m. on Election Day. An official in that state extended the deadline by three days and waived the requirement for a postmark on the mail-in ballot.

The Constitution only grants the state legislature with the legal authority to change the deadline and postmark requirements, not another state official. This raises the question, in this particular example, of whether the ballots cast days after the election with no postmark are in fact legal votes and, if they are not legal votes, should we still count them? Other examples can be cited but, either way, this is analogous to a player allegedly stepping out of bounds.

Normally I would never intervene in another state's business – nor should I. However, Presidential elections are national elections where oftentimes the outcome is determined by only a few states. If state officials were to unilaterally change their state law and those changes 'might' have affected the outcome of the national election, through either fraud or election law violations, then the voters of all the other states who voted for the other candidate would be disenfranchised.

There is an appellate process in football that allows a coach to challenge the results of a play when that coach believes the other team may have violated the rules. The referee reviews the play and either agrees with the challenge or disagrees with the challenge. The losing team had the opportunity through that process to exercise its right to challenge. This process is what legitimizes the final results of the game – even if you disagree with the referees' decision.

In this case, the Supreme Court is our referee and there is a legitimate allegation that a constitutional violation has occurred. The process for choosing our president allows the states the opportunity to challenge a questionable result. The Court is well within its rights to agree or disagree with me but we have the right to challenge. Regardless of the lawsuit's outcome, we should not allow election officials to unilaterally change laws in violation of the US Constitution. Such changes severely diminish the integrity of elections.

It amazes me that so many in the media and on the left want to criticize me and other state attorneys general for exercising a constitutional right to appeal on behalf of so many who believe the rules have been violated. I wonder if this righteous indignation would be as loud if the roles were reversed. History suggests that it would not.



**Robert Kittle**

Communications Director

Office: (803) 734-3670

Cell: (803) 381-3453

[rkittle@scag.gov](mailto:rkittle@scag.gov)

Rembert C. Dennis Building

1000 Assembly Street

Columbia, S.C. 29201



**From:** [Robert Kittle](#)  
**To:** [rkittle@bellsouth.net](mailto:rkittle@bellsouth.net)  
**Subject:** Op-Ed revised  
**Date:** Friday, December 11, 2020 3:46:00 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Why I joined the election lawsuit

By Alan Wilson

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Consider an example where two football teams are playing for the national championship and in the final seconds of the game one team scores the game-winning touchdown. As everyone on the winning team celebrates the win, a camera angle of the touchdown shows that the player who ran the ball into the end zone might have stepped out of bounds before crossing the line.

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Just like football, elections have rules that must be followed to the letter before a winner can be declared. In this particular case, the rules for federal elections are given to us in the U.S. Constitution and those rules basically say that laws dictating the time, location and manner of elections should be determined by state legislatures and no one else.

A number of state officials from other states – well-intentioned or not – unilaterally rewrote the laws through executive fiat which is, arguably, a violation of the ‘electors clause’ of the U.S. Constitution. For example, in one state the state legislature passed a law that said that ballots must be received postmarked by 8:00 p.m. on Election Day. An official in that state extended the deadline by three days and waived the requirement for a postmark on the mail-in ballot.

The Constitution only grants the state legislature with the legal authority to change the deadline and postmark requirements, not another state official. This raises the question, in this particular example, of whether the ballots cast days after the election with no postmark are in fact legal votes and, if they are not legal votes, should we still count them? Other examples can be cited but, either way, this is analogous to a player allegedly stepping out of bounds.

Normally I would never intervene in another state's business – nor should I. However, Presidential elections affect voters in all states and are national elections where oftentimes the outcome is determined by only a few states. If only a few state officials unilaterally change their state law and those changes 'might' have affected the outcome of the national election, through either fraud or election law violations, then the voters of all the other states who voted for the other candidate, including South Carolina, have been disenfranchised.

There is an appellate process in football that allows a coach to challenge the results of a play when that coach believes the other team may have violated the rules. The referee reviews the play and either agrees with the challenge or disagrees with the challenge. The losing team had the opportunity through that process to exercise its right to challenge. This process is what legitimizes the final results of the game – even if you disagree with the referees' decision.

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It amazes me that so many in the media and on the left want to criticize me and other state attorneys general for exercising a constitutional right to appeal on behalf of so many who believe the rules have been violated. I wonder if this righteous indignation would be as loud if the roles were reversed. History suggests that it would not.



**Robert Kittle**

Communications Director

Office: (803) 734-3670

Cell: (803) 381-3453

[rkittle@scag.gov](mailto:rkittle@scag.gov)

Rembert C. Dennis Building

1000 Assembly Street

Columbia, S.C. 29201



**From:** [Alan Wilson](#)  
**To:** [Don Brown - Don Brown Books](#); [Jeff Young](#)  
**Cc:** [Ralph Norman](#); [Don Brown](#)  
**Subject:** RE: Update from Chief Justice Martin  
**Date:** Thursday, December 3, 2020 4:47:32 PM

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Don,

I apologize for now just replying to your email. I am playing catch up. I felt that I at least owed you a response. We have been having constant conversations with other state AGs and state AG staffs. We had received the updated brief this past weekend and even had a follow up conversation with Mike Farris yesterday morning prior to him flying back to Texas. Mike was very accommodating and knowledgeable about the legal issues raised in the pleading.

We raised a few issues with Mike that were also raised by other states that involved issues with state standing under 14<sup>th</sup> amendment analysis as well as issues with the remedy. There were other issues that have been raised that have been difficult to overcome but our staff along with other states are still working through the issue.

Again, I am sorry I was late in my response but I truly appreciate your attention to this issue and I hope we can visit in person someday.

Congressman Norman, I see you are copied. Thank you for facilitating this conversation and I hope to see you soon my friend.

Sincerely,

Alan Wilson  
South Carolina Attorney General  
Post Office Box 11549  
1000 Assembly Street  
Columbia, South Carolina 29211-1549

DeLinda Ridings, Executive Assistant  
Direct: (803) 734-3596  
Email: [dridings@scag.gov](mailto:dridings@scag.gov)

---

**From:** Don Brown - Don Brown Books <[donbrownbooks@gmail.com](mailto:donbrownbooks@gmail.com)>  
**Sent:** Friday, November 27, 2020 7:14 PM  
**To:** Jeff Young <[JYoung@scag.gov](mailto:JYoung@scag.gov)>; Alan Wilson <[agwilson@scag.gov](mailto:agwilson@scag.gov)>  
**Cc:** Ralph Norman <[rnorman@warrennorman.com](mailto:rnorman@warrennorman.com)>; Don Brown <[brownandassociatespllc@gmail.com](mailto:brownandassociatespllc@gmail.com)>  
**Subject:** Update from Chief Justice Martin

Good evening Gentlemen"

Hope you' and your families have had a great Thanksgiving.

Chief Justice Mark Martin called tonight, and indicated that his group is about to send over a much-improved analysis addressing the issues and concerns that y'all raised when we spoke earlier in the week.

Mike Farris, who is the President and CEO of the Alliance Defending Freedom (formerly Alliance Defense Fund) will be sending over reports, perhaps as early as this evening. This evidence will be above and beyond the analysis that Mr. Braynard has been working on, and the CJ tells me it will be more difficult for the opposition to punch holes in the evidentiary conclusions which will be included in the report. It's my understanding that the analysis will address both factual and legal issues. I'm told that the study was authorized a few weeks back at "the highest levels," although I didn't ask the CJ what he meant by that. I took that to mean that study was commissioned and authorized by the White House, but he did not say that specifically.

Chief Justice Martin indicated that if it were possible, he and Mike would be pleased to have a phone conference with the two of you to discuss the findings.

My apologies for intruding into your holiday weekend, but I'm afraid the stakes here may be higher than any of us could have ever envisioned.

Copying our friend Congressman Norman, who has been kind enough to help facilitate communications.

Thank so much for all you do,

Don  
704 605 3320

<http://www.donbrownbooks.com>

[https://en.wikipedia.org/wiki/Don\\_Brown\\_\(author\)](https://en.wikipedia.org/wiki/Don_Brown_(author))

Fox News OPEDs <https://www.foxnews.com/person/b/don-brown>

Twitter: <https://twitter.com/donbrownbooks>

FB fanpage: <https://www.facebook.com/donbrownbooks/>

#LastFighterPilot <https://goo.gl/xctXDP>

#RememberExtortion17 <https://goo.gl/PABx2i>

Amazon Author Page: <https://www.amazon.com/Don-Brown/e/B001IODL9E>

New York Post Author Page: <http://nypost.com/author/don-brown/>

**From:** [Alan Wilson](#)  
**To:** [Don Brown - Don Brown Books](#); [Jeff Young](#)  
**Cc:** [Ralph Norman](#); [Don Brown](#)  
**Subject:** RE: Update from Chief Justice Martin  
**Date:** Thursday, December 3, 2020 4:47:00 PM

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We raised a few issues with Mike that were also raised by other states that involved issues with state standing under 14<sup>th</sup> amendment analysis as well as issues with the remedy. There were other issues that have been raised that have been difficult to overcome but our staff along with other states are still working through the issue.

Again, I am sorry I was late in my response but I truly appreciate your attention to this issue and I hope we can visit in person someday.

Congressman Norman, I see you are copied. Thank you for facilitating this conversation and I hope to see you soon my friend.

Sincerely,

Alan Wilson  
South Carolina Attorney General  
Post Office Box 11549  
1000 Assembly Street  
Columbia, South Carolina 29211-1549

DeLinda Ridings, Executive Assistant  
Direct: (803) 734-3596  
Email: [dridings@scag.gov](mailto:dridings@scag.gov)

---

**From:** Don Brown - Don Brown Books <[donbrownbooks@gmail.com](mailto:donbrownbooks@gmail.com)>  
**Sent:** Friday, November 27, 2020 7:14 PM  
**To:** Jeff Young <[JYoung@scag.gov](mailto:JYoung@scag.gov)>; Alan Wilson <[agwilson@scag.gov](mailto:agwilson@scag.gov)>  
**Cc:** Ralph Norman <[rnorman@warrennorman.com](mailto:rnorman@warrennorman.com)>; Don Brown <[brownandassociatespllc@gmail.com](mailto:brownandassociatespllc@gmail.com)>  
**Subject:** Update from Chief Justice Martin

Good evening Gentlemen"

Hope you' and your families have had a great Thanksgiving.

Chief Justice Mark Martin called tonight, and indicated that his group is about to send over a much-improved analysis addressing the issues and concerns that y'all raised when we spoke earlier in the week.

Mike Farris, who is the President and CEO of the Alliance Defending Freedom (formerly Alliance Defense Fund) will be sending over reports, perhaps as early as this evening. This evidence will be above and beyond the analysis that Mr. Braynard has been working on, and the CJ tells me it will be more difficult for the opposition to punch holes in the evidentiary conclusions which will be included in the report. It's my understanding that the analysis will address both factual and legal issues. I'm told that the study was authorized a few weeks back at "the highest levels," although I didn't ask the CJ what he meant by that. I took that to mean that study was commissioned and authorized by the White House, but he did not say that specifically.

Chief Justice Martin indicated that if it were possible, he and Mike would be pleased to have a phone conference with the two of you to discuss the findings.

My apologies for intruding into your holiday weekend, but I'm afraid the stakes here may be higher than any of us could have ever envisioned.

Copying our friend Congressman Norman, who has been kind enough to help facilitate communications.

Thank so much for all you do,

Don  
704 605 3320

<http://www.donbrownbooks.com>

[https://en.wikipedia.org/wiki/Don\\_Brown\\_\(author\)](https://en.wikipedia.org/wiki/Don_Brown_(author))

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Amazon Author Page: <https://www.amazon.com/Don-Brown/e/B001IODL9E>

New York Post Author Page: <http://nypost.com/author/don-brown/>

**From:** [Alan Wilson](#)  
**To:** [Don Brown - Don Brown Books](#); [Jeff Young](#)  
**Cc:** [Ralph Norman](#); [Don Brown](#)  
**Subject:** RE: Followup - Explanation of hard evidence expected on national voter fraud case  
**Date:** Tuesday, November 24, 2020 6:58:14 PM

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Don,

Thank you for your email and input. I will have it forwarded to our staff to review. Incidentally, former CJ Martin called me last night to give me an update and I was not in a place I could talk. I asked him to call me this morning so that he could have an opportunity to fill me in on what he had learned. I never heard from him today. I just wanted you to know that he has reached out to me as well.

Sincerely,

Alan Wilson  
South Carolina Attorney General  
Post Office Box 11549  
1000 Assembly Street  
Columbia, South Carolina 29211-1549

DeLinda Ridings, Executive Assistant  
Direct: (803) 734-3596  
Email: [dridings@scag.gov](mailto:dridings@scag.gov)

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**From:** Don Brown - Don Brown Books <donbrownbooks@gmail.com>  
**Sent:** Tuesday, November 24, 2020 4:29 PM  
**To:** Alan Wilson <agwilson@scag.gov>; Jeff Young <JYoung@scag.gov>  
**Cc:** Ralph Norman <rnorman@warrennorman.com>; Don Brown <brownandassociatespllc@gmail.com>  
**Subject:** Followup - Explanation of hard evidence expected on national voter fraud case

**To:** The Hon. Alan Wilson, Attorney General of South Carolina.

The Hon. Jeff Young, Chief Deputy Attorney General of South Carolina

**From:** Don Brown, SC State Bar #9902\

**CC:** The Hon. Ralph Norman, Member of Congress, 5th Congressional District

Date: November 24th, 2020

Subject: *Ongoing tabulation of concrete evidence  
showing voter fraud being calculated by Data Scientist  
Matt Braynard*

Gentlemen:

Yesterday during our conversation, you raised a topic on the minds of many, that being the so-called *speculative nature* of the number of votes in play that may be subject to fraud. As the argument goes, there may be fraud, but proving that a specific number of votes are at play to make a difference maybe the challenge.

I mentioned that a prominent, nationally-acclaimed data scientist who specializes in elections, Mr. Matt Braynard, is assembling a study designed to uncover concrete evidence of voter fraud, not just speculation. That study is underway, but almost complete. The results may be out as soon as today.

Mr. Braynard and his team are interviewing voters listed in these “Swing States” absentee and early voting rolls, to see if those voters' actions match with state

records of the voters' actions.

The evidence now mounting is documented by *follow-up affidavits*, and *recorded telephone conversations* with these voters.

As of last week, Friday to be specific, I heard Braynard say that he had already accumulated enough solid evidence to make a difference in reversing the fraud that has occurred in Georgia. I haven't seen those numbers but that is what Mr. Braynard said.

I've been working with Sidney Powell, and now more recently with former NC Chief Justice Mark Martin's group on a variety of overlapping issues related to the democrats' shenanigans in stealing the presidential election. The memo I'm attaching you is part of the work compiled at Sidney's request, to explain Mr. Braynard's process in conducting his voter fraud study, which leads to concrete evidence of a specific number of votes subject to fraud. I'm confident this will produce hard evidence above & beyond the pale of speculation against the shysters who have tried stealing the presidential election.

When Braynard's numbers are final, I will forward those over as well.

I think it will become clear that our voters in South Carolina have been disenfranchised by the unconstitutional actions of unscrupulous Democrat election officials, especially in Michigan, Wisconsin, and Pennsylvania. We follow the Constitution, they don't, and our citizens have been deprived of the equal protection

of law as a result.

Thank you for your time and for your great service to the State of South Carolina.

I'm copying our mutual friend, Congressman Ralph Norman, from here in York County, as he has taken a special interest in this issue, and rightly so.

Hope to see y'all in York County soon!

Thanks, and God bless

Don

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**Date:** Tuesday, November 24, 2020 6:58:00 PM

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