



ALAN WILSON
ATTORNEY GENERAL

August 4, 2021

VIA EMAIL

Ms. Khahilia Shaw
American Oversight
records@americanoversight.org

RE: Freedom of Information Act ("FOIA") request

Dear Ms. Shaw:

Our Office is in receipt of your request pursuant to the FOIA dated April 23, 2021, in which you seek:

All records reflecting communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat or GoogleHangouts, Skype), or calendar invitations, calendar entries, meeting agendas, informational material, any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, or other materials) between (a) Attorney General Alan Wilson, Chief Deputy Attorney General Jeffrey Young, or any person communicating on their behalf, such as a chief of staff, assistant, or scheduler, and (b) Alliance Defending Freedom president Michael Farris, whether in his official or personal capacity.

Please provide all responsive records from November 4, 2020, through the date of search.

On July 30, 2021, we informed you, pursuant to S.C. Code Ann. § 30-4-30(C), that the Office had public records responsive to your FOIA request. We also informed you that, in accordance with § 30-4-30(B), the Office was charging you for its actual costs to search for, retrieve, and redact the public records responsive to your request. A total of one hour of staff time was spent searching for, retrieving, and redacting the relevant public records. Therefore, our actual costs were \$19.00. We informed you that

payment of this balance was required before the Office would produce the responsive documents.

On August 3, 2021, the Office received payment of \$19.00 from you in fulfillment of the balance owed for this request.

Pursuant to your request, the records of this Office were checked and the documents responsive to your request are attached.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "L. David Leggett", with a stylized flourish at the end.

L. David Leggett
Assistant Attorney General

From: [michael farris](#)
To: [Jeff Young](#)
Subject: Updated complaint
Date: Monday, November 30, 2020 10:07:34 AM
Attachments: [State-v-States-Compl 2020-11-30 v4 DRAFT.docx](#)

Jeff,

Please find a much improved version of the complaint attached.

I will call you to update you on the alternatives.

Thanks so much.

Mike

From: [michael farris](#)
To: [Jeff Young](#)
Subject: Draft Complaint
Date: Friday, November 27, 2020 12:49:34 PM
Attachments: [State-v-States-Compl 2020-11-27\[2\].docx](#)

Jeff,

As discussed, my strong recommendation is that the claims be limited to this theory.

1. As SCOTUS has made clear, only legislatures and not administrative officials or courts can change the standards for presidential elections.
2. In the relevant states, this standard was violated.
3. More votes were tainted by this process than the difference between the candidates.

Thanks so much for looking into this.

Call me if you have any questions. 202.341.4783

Mike Farris



Mike Ferris >

iMessage
Mon, Nov 30, 10:30 AM

Jeff Young,

Can you call me at your convenience?

Thanks

Mike Ferris

Tue, Dec 1, 8:50 PM

Can you talk at 9:00 am tomorrow?

I am on a plane that leaves at 8:45. I can talk before that. 8:15?

Ok I will initiate at 8:15

Read 12/1/20

Thanks!!!



iMessage 

