

Subject: RE: Pending Public Records Requests (American Oversight)
Date: Monday, October 10, 2022 at 4:40:34 PM Eastern Daylight Time
From: Morris, Jon
To: AO Records
CC: Public Records, General Counsel
Attachments: American Oversight 21-1462 Records.pdf, American Oversight fee estimates 10.10.22.pdf

EXTERNAL SENDER

Ms. Stoneman:

I have reviewed your correspondence from October 3, 2022, and conferred with our Public Records Coordinator to ensure we provide American Oversight with a comprehensive response for your organization's outstanding requests. Thank you for your continued patience as we put this comprehensive update together. As an initial matter, to answer your question about record retention, the Department's electronic recordkeeping system would still retain any responsive records made during the time period sought. No electronic records would have been subject to disposal.

-
Request #1: 21-1349 – Pursuant to your October 3 request to remove the term “heritage” from the search, the Department's new search identified approximately 53 potentially responsive emails, with up to 2,702 pages of attachments, to part 3 of the request. Attached is a revised fee estimate (Invoice #101021) for the production exceeding the first 30 minutes.

As to your inquiry about part 1 of the request, it is my understanding that no responsive records were identified but I will work to confirm that for you no later than this week. I will provide an update later this week once I have confirmation.

Request #2: 21-1462 – The Department revised the email search and identified 8 potentially responsive emails with up to 20 pages of attachments. These responsive records are attached hereto as “American Oversight 21-1462 Records”.

Request #3: 21-1637 – I have advised the program that American Oversight has indicated they intend to pay the fee estimate previously provided. Upon payment the records will be produced.

Request #4: 22-0687 - The Department revised the email search and identified 17 potentially responsive emails with up to 72 pages of attachments. In order to process this request there would be a fee estimate necessary for the extensive clerical and supervisory assistance required in order to compile, review, and produce said records. The fee estimate (Invoice #076522) is attached hereto.

Request #5: 22-0232 - The Department conducted the requested email search and identified 2 potentially responsive emails to your request. The Department anticipates it will be able to produce the potentially responsive records once they have been retrieved and reviewed for potential exemption. I will provide you an update later this week.

Request #6: 22-0438 – The Department conducted the requested search and identified up to 89 pages of potentially responsive records. A fee estimate (Invoice #050422) for the compilation, review, and production of these records is attached. Upon payment of the fee estimate the Department will complete the processing of this request.

Request #7: 22-0613 - The Department has determined that this request will require the extensive use of information technology resources and clerical assistance will be necessary to identify any responsive records. Accordingly a fee estimate (Invoice #0610022) is being provided contemporaneously with this response.

Request #8: 22-0614 - The Department conducted the requested email search and identified 1,615 potentially responsive emails with up to 6,503 pages of attachments. In order to process this request there would be a fee estimate necessary for the extensive clerical and supervisory assistance required in order to compile, review, and produce said records. The fee estimate (Invoice #0610122) is attached hereto.

Please note this request is rather broad and is not narrowed by any key terms or participants. If American Oversight would like to work on a more selective set of inputs, such as participant, key terms, date range, I would be glad to assist. Please reach out to me directly if you would like to revise the search, either by date, participant, or key term.

Request #9: 22-1063 and Request #10: 22-0162 - The Department is in the process of identifying potentially responsive records to these requests. A fee estimate will be provided by the end of the week.

The estimated service charges are based on the clerical work it will take to compile, redact, and review the responsive records. Please note that this is an estimated charge. If this estimate is incorrect after completion of your request, a refund will be issued based upon the actual time spent to complete your request.

If American Oversight wishes to proceed with the requests, please reference the invoice number and remit payment of the invoice amount. Upon payment of the invoice amount, the Department will complete the processing of American Oversight's requests. Please make your check or money order payable to the Florida Department of State and send it to the Office of the General Counsel. Additionally, please make your payment using your invoice number as the reference.

If you have any questions feel free to ask.

Regards,

Jon F. Morris

Deputy General Counsel
FLORIDA DEPARTMENT OF STATE
500 South Bronough Street, Suite 100
Tallahassee, Florida 32399-0250
(p): (850) 245-6515
(f): (850) 245-6127

From: AO Records <records@americanoversight.org>
Sent: Monday, October 3, 2022 2:20 PM
To: Morris, Jon <Jon.Morris@dos.myflorida.com>
Cc: Public Records <PublicRecords@Dos.myflorida.com>; General Counsel <DOS.GeneralCounsel@DOS.MyFlorida.com>
Subject: Re: Pending Public Records Requests (American Oversight)

EMAIL RECEIVED FROM EXTERNAL SOURCE

The attachments/links in this message have been scanned by Proofpoint.

Mr. Morris,

Thank you for your response.

At the outset, we have significant concerns about receiving a No Records Response from the Department for two of these requests at this stage. The lengthy lack of communication from the Department on these requests until I affirmatively requested updates suggests that searches for responsive records may not have been performed until just last week. A significant delay in the processing of a public records request—in one instance here, for almost one year—risks the loss of records (*e.g.*, due to a failure to retain responsive records or the departure of employees who would be able to identify the location of responsive records). Because this arguably unjustified extended delay in searching may be the reason for the No Records Responses here, please confirm whether backup files exist for the relevant custodians' communications and, if so, whether those backup files can be searched for responsive records.

Regarding Request 21-1637, we are processing payment for the invoiced \$18.25 fee and will send a check in the mail asap. Please keep us updated on the processing of this request.

Regarding Request 21-1349, your description of the search conducted for this request did not include results for Part 1, which asked for the text messages of Secretary of State Laurel Lee. Please confirm

whether you have conducted a search for records responsive to Part 1 of this request and the results of such search. Further, please remove the term “heritage” from the list of key terms and let us know the new number of results for Part 3 and the adjusted fee estimate. We are hopeful that removing that term will significantly decrease the number of results requiring review and processing. Once we receive the adjusted fee estimate reflecting the change to the Part 3 key terms search, absent other concerns, we will remit payment asap

Moreover, four additional public records requests sent to the FL Department of State have been pending for three or more months now:

- FL-SOS-22-0232 (submitted 3/7/22)
- FL-SOS-22-0438 (submitted 5/4/22)
- FL-SOS-22-0163 (submitted 6/29/22)
- FL-SOS-22-0614 (submitted 6/29/22)

We have received no communications from the Department regarding the processing of these requests. In light of the concerns expressed above about delayed searching and possible loss of responsive records by the Department, please confirm that searches for responsive records have been initiated for these requests. Further, as the underlying records are of urgent interest to the public in advance of the Secretary’s administration and oversight of this fall’s midterm elections, we ask that you produce records responsive to these four requests no later than **one week** from the date of this email.

Finally, in an attempt to avoid the significant delays by the Department we have seen in the processing of our prior requests, I would like to flag for your awareness two additional requests sent to the Department on Friday morning: FL-DOS-22-1062 and FL-DOS-22-1063. Please begin processing of these requests promptly.

Sincerely,
Taylor Stoneman

Taylor Stoneman (she/her)
Counsel
American Oversight
records@americanoversight.org
(202) 848-1319

From: Morris, Jon <Jon.Morris@dos.myflorida.com>
Date: Thursday, September 29, 2022 at 7:57 AM
To: AO Records <records@americanoversight.org>
Cc: Public Records <PublicRecords@Dos.myflorida.com>, General Counsel <DOS.GeneralCounsel@DOS.MyFlorida.com>
Subject: RE: Pending Public Records Requests (American Oversight)

EXTERNAL SENDER

Ms. Stoneman,

Please see the following response from the Department of State concerning your email inquiry below. I will be glad to assist you personally if you have any further questions. If you need to reach me this week my office cell is 850-251-1520.

Request #1: 21-1349 – The Department conducted the requested search and identified approximately 20 potentially responsive emails to part 2 of the request and 149 potentially responsive emails, with up to 8,500 pages of attachments, to part 3 of the request. The Department will provide a rolling production of the responsive records with the first 30 minutes being at no cost to the requestor. The remainder of the production will require extensive use of information technology resources and extensive clerical or supervisory assistance that will necessitate a cost estimate. Attached is a fee estimate for the production exceeding the first 30 minutes.

As a quick note, a great deal of the records that were pulled in for part 3 appear to be because of the key term “heritage” – however from a brief initial review the majority or all appear to be related to the Department of State’s Division of Historic Resources and the use of heritage in that context. If you would like to work on a more selective set of key terms I would be glad to assist personally with you. Please reach out to me directly if you would like to revise the search, either by date, participant, or key term.

Request #2: 21-1462 – The Department conducted the requested email search and identified no records responsive to your request.

Request #3: 21-1637 – The Division of Elections has provided the following information:

Part 1) Although the Division does not have a record that provides all the information you are seeking, the most applicable record would appear to be the 2016 and 2020 General Election Recap. In order to process this request there would be a fee estimate for approximately 1 and a half hours of staff time necessary to compile the responsive records. Attached is the fee estimate with the first 30 minutes free.

Part 2) Materials from canvassing board workshop may be responsive to this request. You may find records online at: <https://www.myfloridaelections.com/FSE-Member-Resources/Conference-and-Workshops-Presentations/Other-Workshop-and-Event-Presentations>

Part 3) The Department of State would not have records responsive to this inquiry – this information may be held by the Supervisors of Election.

Request #4: 22-0687 - The Department conducted the requested email search and identified no emails responsive to your request.

Jon F. Morris
Deputy General Counsel
FLORIDA DEPARTMENT OF STATE
500 South Bronough Street, Suite 100
Tallahassee, Florida 32399-0250
(p): (850) 245-6515
(f): (850) 245-6127

From: AO Records <records@americanoversight.org>

Sent: Friday, September 23, 2022 2:38 PM

To: General Counsel <DOS.GeneralCounsel@DOS.MyFlorida.com>; Public Records <PublicRecords@Dos.myflorida.com>

Subject: Pending Public Records Requests (American Oversight)

EMAIL RECEIVED FROM EXTERNAL SOURCE

The attachments/links in this message have been scanned by Proofpoint.

Office of the General Counsel:

I write on behalf of American Oversight to request an update regarding four pending public records requests submitted to the Florida Department of State in the past year, bearing the following internal tracking numbers:

- FL-DOS-21-1349 (Submitted October 4, 2021)
- FL-DOS-21-1462 (Submitted October 20, 2021)
- FL-DOS-21-1637 (Submitted November 15, 2021)
- FL-DOS-22-0687 (Submitted July 22, 2022)

I have attached these four requests for your reference. The Department of State has had ample time to review records responsive to American Oversight's requests and comply with its legal obligation to produce records within a reasonable amount of time. *See generally Tribune Co. v. Cannella*, 458 So. 2d 1075, 1079 (Fla. 1984), *appeal dismissed sub nom., DePerte v. Tribune Co.*, 105 S. Cut. 2315 (1985) ("The only delay permitted by the [Public Records] Act is the limited reasonable time allowed the custodian to retrieve the record and delete those portions of the record the custodian asserts are exempt."). But to date, American Oversight has not received a single document in response to any of these requests.

"Unjustified delay in making non-exempt public records available violates Florida's public records law." *Promenade D'Iberville, LLC v. Sundy*, 145 So. 3d 980, 983 (Fla. 1st DCA 2014). The delay in response and complete lack of communication from the Department of State with respect to these requests clearly constitute unreasonable delay rising to the level of a violation of the Public Records Act. If the Governor's Office continues to violate its obligations under the Public Records Act, American Oversight is prepared to resort to legal action to enforce its rights. *See Fla. Stat. § 119.11(1); Chandler v. City of Greenacres*, 140 So. 3d 1080, 1083 (Fla. 4th DCA 2014).

If you would like to discuss this matter, please do not hesitate to contact me.

Sincerely,
Taylor Stoneman

Taylor Stoneman (she/her)
Counsel
American Oversight
records@americanoversight.org
(202) 848-1319

From: Consent Decree ORR <consentdecree@truethevote.org>
Sent time: 05/14/2021 09:11:30 PM
To: Secretary of State
Subject: Consent Decree Orr FL ORR1
Attachments: CONSENT DECREE FL ORR1.pdf

EMAIL RECEIVED FROM EXTERNAL SOURCE

The attachments/links in this message have been scanned by Proofpoint.

Please see attached:

Warmest Regards,

True the Vote Research Team

May 14, 2021

Secretary of State
Laurel M. Lee
R.A. Gray Building, 500 South Bronough Street
Tallahassee, FL 32399
SecretaryofState@DOS.MyFlorida.com
[850.245.6125](tel:850.245.6125)

Dear Ms. Laurel M. Lee,

Under Fla. Stat. Secs. 119.01 to 119.15, I request information regarding any consent decrees related to election or voter registration processes enacted at any point since 2008 to present day. Respectfully, please provide this information in the form of electronic copies of each of the following documents, files, or images, as soon as they become available. You need not wait until the entire request is satisfied before providing documents that are ready for production.

Specifically, I seek the following:

- 1) Access to and a copy of any Consent Decrees;
- 2) Access to and a copy of any Consent Agreements;
- 3) Access to and a copy of any Settlement Agreements;

entered into by your Secretary of State and/or any entity related to the administration of elections since 2008.

If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. As provided in the open records law, Fla. Stat. Secs. 119.12, I will expect your response within three (3) business days. Should a proper response take longer, please notify me immediately.

Please provide all information electronically/digitally (PDF Preferred) via email. I agree to pay any reasonable copying and postage fees of not more than \$50 with a receipt provided indicating the charges for each document should they exceed such cost. If the cost would be greater than this amount, please notify me.

If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. Also, please provide all segregable portions of otherwise exempt material.

Any materials requiring delivery via USPS or other carrier service should be directed to:

True the Vote Research Department,

P.O. Box 3109, Houston, Texas 77253-3109
Emails may be addressed to research@truethevote.org

Thank you for your assistance.

Sincerely,

Catherine Engelbrecht
President and Founder
True the Vote
research@truethevote.org

713.401.6017 | PO Box 3109 #19128 Houston, TX 77253 | truethevote.org

From: TTV Research <research@truethevote.org>
Sent time: 09/13/2021 12:49:59 PM
To: Secretary of State
Subject: Florida ORR
Attachments: 1. TTV ORR Voter List Maintenance FL 9.13.2.pdf

EMAIL RECEIVED FROM EXTERNAL SOURCE

The attachments/links in this message have been scanned by Proofpoint.

Good Afternoon, Please find attached an open records request. Thank you!

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Sincerely,

True the Vote
Research Team
research@truethevote.org
(713) 401-6017

September 13, 2021



Laurel M. Lee, Secretary of State
R.A. Gray Building, 500 South Bronough Street
Tallahassee, FL 32399
SecretaryofState@DOS.MyFlorida.com

Dear Ms.Lee,

Under Fla. Stat. Secs. 119.01 to 119.15, I am requesting information about your state's voter roll maintenance. Please provide this information in the form of electronic copies of each of the following documents, files, or images, as soon as they become available. You need not wait until the entire request is satisfied before providing documents that are ready for production. The timeframe and scope of this request are for copies of any and all policy and procedures from the year 2016 to the present day regarding voter roll maintenance, including but not limited to:

- A. A list of all entities with integrations, APIs, connections, accounts, contracts, agreements, or similar means of adding, importing, exporting, editing, supplying, tracking, validating, or monitoring voter registration or voter history data.
- B. Copies of any and all contracts, agreements, accounts, subscriptions, invoices, decrees, or written standards of any sort that document the relationships with any entity listed in Section A of this request.
- C. Any and all copies of requests for production, technical documents, operating guides, training manuals, contracts, invoices related in any way to your state's voter registration management system(s) software(s) used from 2016 to the present.
- D. Copies of all policies and procedures detailing the processes your state followed to validate the accuracy of incoming voter registration applications and information.
- E. A copy of a list of all data providers or sources your state used to validate voter identity, along with the data element(s) they provide verification of.
- F. A copy of a list of all data providers or sources your state used to validate voter residency, along with the data element(s) they provide verification of.

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G. A list of all data providers or sources used to validate voter citizenship, along with the data element(s) they provide verification of.

H. Copies of any and all lists of all additional data providers or sources used to validate voter records that impact eligibility, including but not limited to criminal records, any interstate databases (by name), any intrastate databases (by name), etc., along with the data element(s) they provide verification of.

I. Copies of all policies and procedures detailing the processes followed to manage and maintain voter records, including but not limited to all steps taken to ensure accuracy of individual records, criteria for removal of records, maintenance schedules, and schedules related to voter notification and response requirements.

J. Sample copies of all notifications, messages, reports, letters, or other correspondence sent to voters related to their voter registration status.

K. Copies of any list, by date, of records removed from the registry, including all voter information, and the reason for removal.

If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. As provided in the open records law, Fla. Stat. Secs. 119.12, I will expect your response within three (3) business days. Should a proper response take longer, please notify me immediately. Please provide all information electronically/digitally (PDF Preferred) via email. I agree to pay any reasonable copying and postage fees of not more than \$50 with a receipt provided indicating the charges for each document should they exceed such cost. If the cost would be greater than this amount, please notify me. If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. Please provide all segregable portions of otherwise exempt material. Materials requiring delivery via USPS or another carrier service should be directed to:

True the Vote Research Department,
P.O. Box 3109, Houston, Texas 77253-3109
Emails may be addressed to research@truethevote.org

Sincerely,
Catherine Engelbrecht
Founder & President
True the Vote

From: TTV Research <research@truethevote.org>
Sent time: 10/01/2021 01:57:22 PM
To: Secretary of State
Subject: Florida SOP
Attachments: 1. TTV ORR FL SOP 10.1.21.pdf

EMAIL RECEIVED FROM EXTERNAL SOURCE

The attachments/links in this message have been scanned by Proofpoint.

Good Afternoon,

Please find attached an Open Records Request.

Thank you!

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Sincerely,

True the Vote
Research Team
research@truethevote.org
(713) 401-6017



October 1, 2021

Laurel M. Lee, Secretary of State
R.A. Gray Building, 500 South Bronough Street
Tallahassee, FL 32399
SecretaryofState@DOS.MyFlorida.com

Dear Ms.Lee,

Under Fla. Stat. Secs. 119.01 to 119.15, I am requesting information about your state’s voter roll maintenance. Please provide this information in the form of electronic copies of each of the following documents, files, or images, as soon as they become available. You need not wait until the entire request is satisfied before providing documents that are ready for production. The timeframe and scope of this request are for copies of any and all policy and procedures from the year 2016 to the present day regarding voter roll maintenance, including but not limited to:

- 1.) Copies of any and all documents and/or communications related to your state’s standard process of voter roll maintenance and the updates that are made to the active and inactive voter lists. Including any standard processes related to how the counties in your state update the voter rolls and the relationship they have with your office.

If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. As provided in the open records law, Fla. Stat. Secs. 119.12, I will expect your response within three (3) business days. Should a proper response take longer, please notify me immediately. Please provide all information electronically/digitally (PDF Preferred) via email. I agree to pay any reasonable copying and postage fees of not more than \$50 with a receipt provided indicating the charges for each document should they exceed such cost. If the cost would be greater than this amount, please notify me. If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. Please provide all segregable portions of otherwise exempt material. Materials requiring delivery via USPS or another carrier service should be directed to:

True the Vote Research Department,
P.O. Box 3109, Houston, Texas 77253-3109
Emails may be addressed to research@truethevote.org

Sincerely,
Catherine Engelbrecht

Founder & President
True the Vote

From: Roberta Swank <roberta@truethevote.org>
Sent time: 03/29/2021 01:52:22 PM
To: DivElections
Subject: Florida Statewide Voter Data - Monthly Disc

EMAIL RECEIVED FROM EXTERNAL SOURCE

Attn: Elections Division

This is a request that each month the disc of statewide voter data, with voter history, be mailed to the following address:

Catherine Engelbrecht
13909 Track Road
Cat Spring, TX 78933

Phone: 713-401-6017

We understand that the discs will be mailed monthly during all of 2021.

Please let us know if you need additional information to fulfill the request.

Thank you for your assistance.

Roberta Swank
True The Vote

From: Defend Our Union <ro.g@defendourunion.org>
Sent time: 05/24/2021 06:36:48 PM
To: DivElections
Subject: Florida Voter Extract disc request

EMAIL RECEIVED FROM EXTERNAL SOURCE

Hello,

I'd like to make a "standing request" for the Florida Voter Extract discs. Please have it sent monthly to:

Defend Florida
Attn: Caroline Wetherington
[7590 Fruitville Rd](#)
[Suite 200](#)
[Sarasota FL 34240](#)

Thanks

Ro

Defend Our Union - FL
www.defendourunion.org

From: TTV Research <research@truethevote.org>
Sent time: 04/21/2021 11:57:47 AM
To: Secretary of State
Subject: Open Records Request
Attachments: FL ORR VoteShield.pdf

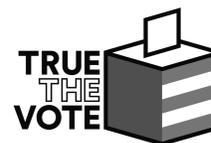
EMAIL RECEIVED FROM EXTERNAL SOURCE

The attachments/links in this message have been scanned by Proofpoint.

Good Afternoon,

Please find attached an Open Records Request.

Sincerely,
True The Vote Research Team



April 21, 2021

Laurel M. Lee
Secretary of State, Florida
R.A. Gray Building, 500 South Bronough Street
Tallahassee, FL 32399
SecretaryofState@DOS.MyFlorida.com

Dear Secretary of State,

I request information as it regards to VoteShield in the State of New Jersey under the Florida Open Records Law Fla. Stat. Secs. 119.01 to 119.15. We respectfully request to be provided with electronic copies of each of the following documents, files, or images, as soon as they become available. You need not wait until the entire request is satisfied before providing documents that are ready for production.

Specifically, I seek the following:

1. Access to and a copy of any and all documents related to the acquisition, utilization, specifications, security, and maintenance of VoteShield. Specifically, any related Request for Proposal Requests, Request for Proposal Responses, solicitation materials, contracts, sole source certifications, amendments, purchase orders, invoices, technical specifications, user manuals, training collateral, and security certifications.
2. All documents specified by statute to be retained in relation to the VoteShield system and network, either connected directly or indirectly, to VoteShield at large.
3. Any and all invoices, correspondence (including emails, memos, and advisories) related to the acquisition, utilization, specifications, security, and maintenance of the VoteShield.
4. All relevant and responsive documents specifically related to how Florida uses VoteShield, and the implementation of the external analysis acquired by this system and submitted to Florida.

If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. As provided in the open records law, I will expect your response within three (3) business days.

Please provide all information electronically/digitally (PDF Preferred) via email. I agree to pay any reasonable copying and postage fees of not more than \$50 with a receipt provided indicating the charges for each document should they exceed such cost. If the cost would be greater than this amount, please notify me. I would note that willful violation of the open records law can result in the award of court costs and reasonable attorney fees. Sec. 119.12.

Any materials requiring delivery via USPS or other carrier service should be directed to:

713.401.6017 | PO Box 3109 #19128 Houston, TX 77253 | truethevote.org

**True the Vote Research Department,
P.O. Box 3109, Houston, Texas 77253-3109
Emails may be addressed to research@truethevote.org**

Thank you for your assistance.

Sincerely,

Catherine Engelbrecht
President and Founder
True the Vote
research@truethevote.org

713.401.6017 | PO Box 3109 #19128 Houston, TX 77253 | truethevote.org

From: TTV Research <research@truethevote.org>
Sent time: 04/15/2021 03:58:38 PM
To: DivElections
Subject: Open Records Request
Attachments: FL ERIC ORR.pdf

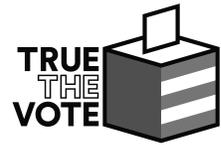
EMAIL RECEIVED FROM EXTERNAL SOURCE

The attachments/links in this message have been scanned by Proofpoint.

Good Afternoon,

Please find attached an Open Records Request.

Sincerely,
True The Vote Research Team



April 15, 2021

Florida Division of Elections
R.A. Gray Building, Room 316
500 South Bronough Street
Tallahassee, Florida 32399-0250
DivElections@dos.myflorida.com

Dear Sir or Madam,

I request information regarding the Electronic Registration Information Center (ERIC) under Section 8 of the National Voter Registration Act of 1993 (NVRA), 52 U.S.C. 20507(i). I also respectfully request to be provided with electronic copies of each of the following documents, files, or images, as soon as they become available. You need not wait until the entire request is satisfied before providing documents that are ready for production.

Specifically, I seek the following:

1. Copies of all documents establishing and detailing the membership of your state with ERIC, including any documents detailing the costs (if any) associated with membership and outlays required to process ERIC data;
2. Copies of any and all list maintenance data reports received from ERIC for the year 2018, 2019, 2020, and 2021 where applicable; and
3. Copies of all records and/or reports indicating the maintenance actions taken following the processing of the ERIC reports, including any records indicating where maintenance actions were not taken due to faults within the ERIC data. This request also pertains to any and all written correspondence related to these matters.

If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. I will expect your response within ten (10) business days, or twenty (20) days if my request requires substantial programming or manipulation of data.

Please provide all information electronically/digitally (PDF Preferred) via email. I agree to pay any reasonable copying and postage fees of not more than \$50 with a receipt provided indicating the charges for each document should they exceed such cost. If the cost would be greater than this amount, please notify me.

If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. Also, please provide all segregable portions of otherwise exempt material.

Any materials requiring delivery via USPS or other carrier service should be directed to:

**True the Vote Research Department,
P.O. Box 3109, Houston, Texas 77253-3109
Emails may be addressed to research@truethevote.org**

Thank you for your assistance.

Sincerely,

Catherine Engelbrecht
Founder and President
True The Vote
research@truethevote.org

From: TTV Research <research@truethevote.org>
Sent time: 04/21/2021 11:59:35 AM
To: Secretary of State
Subject: Revised Open Records Request
Attachments: FL ORR VoteShield.pdf

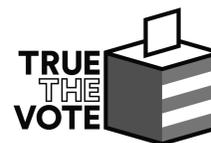
EMAIL RECEIVED FROM EXTERNAL SOURCE

The attachments/links in this message have been scanned by Proofpoint.

Good Afternoon,

Please find attached an Open Records Request.

Sincerely,
True The Vote Research Team



April 21, 2021

Laurel M. Lee
Secretary of State, Florida
R.A. Gray Building, 500 South Bronough Street
Tallahassee, FL 32399
SecretaryofState@DOS.MyFlorida.com

Dear Secretary of State,

I request information as it regards to VoteShield in the State of Florida under the Florida Open Records Law Fla. Stat. Secs. 119.01 to 119.15. We respectfully request to be provided with electronic copies of each of the following documents, files, or images, as soon as they become available. You need not wait until the entire request is satisfied before providing documents that are ready for production.

Specifically, I seek the following:

1. Access to and a copy of any and all documents related to the acquisition, utilization, specifications, security, and maintenance of VoteShield. Specifically, any related Request for Proposal Requests, Request for Proposal Responses, solicitation materials, contracts, sole source certifications, amendments, purchase orders, invoices, technical specifications, user manuals, training collateral, and security certifications.
2. All documents specified by statute to be retained in relation to the VoteShield system and network, either connected directly or indirectly, to VoteShield at large.
3. Any and all invoices, correspondence (including emails, memos, and advisories) related to the acquisition, utilization, specifications, security, and maintenance of the VoteShield.
4. All relevant and responsive documents specifically related to how Florida uses VoteShield, and the implementation of the external analysis acquired by this system and submitted to Florida.

If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. As provided in the open records law, I will expect your response within three (3) business days.

Please provide all information electronically/digitally (PDF Preferred) via email. I agree to pay any reasonable copying and postage fees of not more than \$50 with a receipt provided indicating the charges for each document should they exceed such cost. If the cost would be greater than this amount, please notify me. I would note that willful violation of the open records law can result in the award of court costs and reasonable attorney fees. Sec. 119.12.

Any materials requiring delivery via USPS or other carrier service should be directed to:

713.401.6017 | PO Box 3109 #19128 Houston, TX 77253 | truethevote.org

**True the Vote Research Department,
P.O. Box 3109, Houston, Texas 77253-3109
Emails may be addressed to research@truethevote.org**

Thank you for your assistance.

Sincerely,

Catherine Engelbrecht
President and Founder
True the Vote
research@truethevote.org

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