

The State of Texas

Executive Division
Capitol Building, 1E.8
P.O. Box 12887
Austin, Texas 78711-2887



Phone: 512-463-5770
Fax: 512-463-2761
Dial 7-1-1 For Relay Services
www.sos.texas.gov

John B. Scott
Secretary of State

January 6, 2022

Emma Lewis
American Oversight

Sent via Electronic Mail in care of Sarah Wishingrad to: records@americanoversight.org

Re: Request for records, TX-SOS-21-1810, received: December 17, 2021
(SOS PIR No. 21-1231)

Dear Ms. Lewis:

This letter responds to your request for information under the Public Information Act, Chapter 552 of the Texas Government Code (the “PIA”), which was received by the Office of the Texas Secretary of State (the “Office”) via email on December 17, 2021 (the “Request”).¹ In the Request, you indicate that you are seeking the following records dating back to October 5, 2021:

1. *All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) the Texas Secretary of State officials listed below, and (b) the external individuals listed below (including, but not limited to, at the listed email addresses).*

Texas Secretary of State Officials

- i. *Anyone serving as Secretary of State, including in an acting or interim capacity, or otherwise carrying out the duties of the position*
- ii. *Jose A. Esparza, Deputy Secretary of State*
- iii. *Adam Bitter, General Counsel*
- iv. *Teresa Farfan, Senior Advisor*
- v. *Keith Ingram, Elections Division Director*
- vi. *Kristi Hart, Elections Administration & Voter Registration*
- vii. *Christina Adkins, General Law – Elections Division*
- viii. *Kim Bergmann, Executive Assistant and Scheduler*

¹ On December 23, 2021, the Office operated on a skeleton-crew basis for the first half of the day and was closed for the second half of the day—and the Office remained closed on December 24 and December 27—in observance of the Christmas holiday. Additionally, on December 31, 2021, the Office operated on a skeleton-crew basis for the first half of the day and was closed for the second half of the day in observance of New Year’s Day. Therefore, the 10th business day from the date that we received the Request is today, January 6, 2022.

External Individuals

- i. Steve Davis (sdavis@digitaldiscoveryesi.com)
- ii. Charles Bundren (charles@bundrenlaw.net)
- iii. Jill Foote
- iv. Randy Price (randy.price@stewardpartners.com)
- v. Jay Meadows (jay@jalwest.com)
- vi. John Graves (john@johngravespc.com)
- vii. Joe Arlinghaus (jarlinghaus@valoramerica.org)
- viii. Rex Nichols (rex@nicholsgroup.com)
- ix. Jenny Limcher (jlimcher@hi-reit.com)
- x. Al Hartman
- xi. Sean Themea (sean.themea@yaliberty.org)
- xii. Ivan Raiklin (ivan.raiklin@gmail.com or socialmediaraiklin@gmail.com)
- xiii. Mark Finchem (mfinchem@azleg.gov or markfinchem@me.com)
- xiv. Sonny Borrelli (sborrelli@azleg.gov, sonny4ld5@hotmail.com, or sonnyborrelli@hotmail.com)
- xv. Doug Mastriano (dmastriano@pasen.gov)
- xvi. Matthew DePerno (matthew@depernolaw.com)
- xvii. Christina Bobb (christina.bobb@oann.com)
- xviii. Chanel Rion (chanel.rion@oann.com)
- xix. Ben Cotton (ben.cotton@cyfir.com)
- xx. Shiva Ayyadurai (vashiva@vashiva.com)
- xxi. Thomas Datwyler (tcdatwyler@gmail.com)
- xxii. Phil Waldron (phil@onewarrior.com or p@bonfirererearch.org)
- xxiii. Russ Ramsland (ryuks9sq@alliedspecialops.us)
- xxiv. James Keet Lewis III (keet@jkeetlewis.com)
- xxv. Larry Marso (lmarso@gmail.com)
- xxvi. Jeff Lenberg
- xxvii. Jovan Hutton Pulitzer (jovanhuttonpulitzer@gmail.com)
- xxviii. Doug Logan (dlogan@cyberninjas.net)
- xxix. Mike Flynn (schedule@generalflynn.com)
- xxx. Kenneth Blackwell (kennethblackwell693@gmail.com)
- xxxi. Jackson Lane (jacksonlane@americasfuture.net)
- xxxii. Lin Wood (lwood@fightback.law)
- xxxiii. Mark Bowman (mbowman@alecaction.org)
- xxxiv. Patrick Byrne, or anyone communicating from an email address ending in @americaproject.com
- xxxv. Hogan Gidley (hogan@americafirstpolicy.com)
- xxxvi. Catherine Engelbrecht (catherine@truethevote.org)
- xxxvii. Phill Kline (phillklineva@gmail.com)
- xxxviii. John Eastman (jeastman@claremont.org)
- xxxix. Reince Priebus (rp@michaelbest.com)
- xl. Jeff DeWit
- xli. Tommy Hicks (tommy@hsrxgroup.com or tommyhicksrnc@gmail.com)
- xl.ii. Ed Corrigan
- xl.iii. Jason Yates
- xl.iii. Tony Perkins (arp@frc.org), or anyone communicating from an email address ending in @frc.org

- xlvi. Michael Farris, or anyone communicating from an email address ending in @adflegal.org
- xlvi. Lori Gallagher
- xlvi. Don Garner

2. All text message conversations or message chains on messaging applications similar in form to text messages (such as Signal, WhatsApp, Facebook Messenger, Twitter DMs, etc.) between the Texas Secretary of State officials listed above and the external individuals listed above.
3. All records reflecting communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp), telephone call logs, calendar invitations, calendar entries, meeting agendas, talking points, any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, or other materials) between (a) the Texas Secretary of State officials listed above, and (b) Former President Donald Trump, Rudolph Giuliani, Mark Meadows, Jenna Ellis, Cleta Mitchell, or any person communicating on their behalf.

We are processing your Request in accordance with the terms of the PIA.² To that end, please find the attached documents responsive to the Request. We require more time to review our records and produce other responsive documents, if any. We will provide you any additional responsive documents—to the extent such information is not excepted from disclosure under state or federal law—by 5:00 p.m. on February 3, 2022. See Tex. Gov’t Code § 552.221(d).

If you have any questions or need additional information, please contact our office at (512) 463-5770.

Sincerely,



Adam Bitter
General Counsel
Office of the Texas Secretary of State
generalcounsel@sos.texas.gov
AB/jw

² The PIA applies only to information in existence as of the date that the governmental entity receives the request and thus does not require the entity to create new information in response to a request or comply with a continuing request to supply information on a periodic basis as such information is prepared in the future. See Tex. Gov’t Code §§ 552.002, .021, .227, .351; *A&T Consultants, Inc. v. Sharp*, 904 S.W.2d 668, 676 (Tex. 1995); *Fish v. Dallas Indep. Sch. Dist.*, 31 S.W.3d 678, 681 (Tex. App.—Eastland 2000, pet. denied); Tex. Att’y Gen. Op. JM-48 at 2 (1983); Open Records Decision Nos. 476 at 1 (1987), 465 at 1 (1987), 452 at 2–3 (1986), 342 at 3 (1982).

From: [GeneralCounsel](#)
To: [REDACTED]
Cc: [GeneralCounsel](#)
Subject: RE: PIA REQUEST
Date: Wednesday, December 1, 2021 3:45:41 PM
Attachments: Public-Information-Request-Form-10-01-19.pdf

Thank you for contacting the Office of the Texas Secretary of State. Your email was forwarded to the General Counsel for response. This email acknowledges receipt of your request for information under the Public Information Act, and we will process it in accordance with Chapter 552 of the Texas Government Code.

We will let you know if we have any questions or need clarification.

Regards,
Office of the Texas Secretary of State

From: Ryan Gallagher [REDACTED]
Sent: Monday, November 29, 2021 7:31 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: PIA REQUEST

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

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The Texas Secretary of State has stated in the below notice, that all the information is available for public request and inspection.

I would like to request a copy of all election records for the 4 Counties listed below, as well all the same records for, Hays, Travis, and Williamson County. This is for the necessary and public good and will benefit voter confidence in our Constitutional Republic.

Since the work has already been completed for the below 4 Counties, and most of the records have already been requested in the other Counties, we expect a timely response and full electronic copy of our request. We can provide new thumbnail drives if necessary and helps.

Thank you,
Lori Gallagher
5125290493

We have a team of Citizen auditors ready to process election records.

Texas Secretary of State Full Forensic Audit of 2020 General Election

The Texas Secretary of State's office has announced a full forensic audit of the 2020 General Election in Dallas, Harris, Tarrant and Collin counties. The full forensic audit is being conducted in two phases, the first of which is already underway. The **purpose of this audit is to ensure all Texas voters can have confidence in the elections systems in our state**, and to address any outstanding issues county election officials may face that undermines the integrity of our elections. **Please send the records for Dallas, Harris, Tarrant, and Collin Counties, with Williamson, Hays, and Travis included.**

Phase 1: Testing Voting Machine Accuracy, Cybersecurity Assessments, and Identifying and Removing Ineligible Voters Who Cast Ballots in 2020 (Already Completed or Underway)

- Please provide a copy of all cybersecurity assessments and lists of ineligible voters who cast ballots in 2020.

After every single Texas election, counties are required to conduct a partial manual count of electronic voting system ballots within 72 hours of the polls closing to ensure the accuracy of the tabulation of electronic voting systems results (Sec.

127.201). Please provide results to partial manual count of electronic voting system ballots for Williamson, Dallas, Harris, Tarrant, Collin, Travis, and Hays Counties.

All counties are required to undergo an Election Security Assessment (ESA) of the county's election system (Sec. 279.003). All 254 counties have completed these assessments.

- Please provide ESA for all 254 Counties

Under both state and federal law, the Texas Secretary of State's office is empowered to maintain the accuracy of the statewide voter registration list to ensure that ineligible voters – including deceased individuals, individuals registered in multiple states or counties, and non-U.S. citizens – do not remain on the voter rolls (Secs. 18.061 – 18.0681). Dead voters were on our voter registration rolls in Williamson County for November 3, 2020 Joint General Election. Please provide list of all voters that had a change in voter information and filled out "Change of Voter Information Form" for 2020 Election year in Williamson, Dallas, Harris, Tarrant, Collin, Travis, and Hays Counties.

- As part of the audit process, the office has received reports from the Electronic Registration Information Center (ERIC) regarding voters who may have voted twice in state and across state lines. Please provide reports from ERIC with list of voters that voted twice and those from across state lines.

We have also received a report of persons who may have been deceased when a vote was cast in their name. Please provide a copy of this report and any communications with key words "deceased" in the body.

Finally, we have identified potential non-U.S. citizen voters and have directed county voter registrars to take action to verify the eligibility of registered voters and cancel their registration if they do not present proof of eligibility. Please provide list of potential non-US citizen voters that have been identified in Texas and the list of canceled voter registrations.

Once that action has been taken, our office evaluates the persons cancelled and refers any instances of possible illegal voting to the Office of the Texas Attorney General for investigation (Sec. 31.006).

Phase 2: Comprehensive Election Records Examination (Spring 2022)

- As part of the Texas Secretary of State's duty to assist and advise all election authorities with regard to the application, operation, and interpretation of the Texas Election Code (Sec. 31.004) and to obtain and maintain uniformity in the application of the Code (Sec. 31.003), the office will conduct a comprehensive election records examination over the next several months to ensure election administration procedures were properly followed during the 2020 General Election.

- The records examined from each county will include – but are not limited to – the following types of documents:

Please provide a copy of the following documents and forms for Williamson, Hays, Travis, Harris, Tarrant, Dallas, and Collin Counties.

- o Logic & Accuracy Testing Records for Voting Machines, including:

§

All test ballots voted

§

Test Deck Records

§

Testing Media

o Early Voting and Election Day Materials, including:

§ List of registered voters used in the 2020 General Election

§ Daily Early Voting Rosters for in-person voting

§ Chain of Custody forms that document the seals on the ballot boxes

§ Chain of Custody delivery and pickup of equipment at voting sites

§ Statements of Residence

§ Reasonable Impediment Declarations

§ Limited Ballot Applications

§ Audit Logs from applicable Voting System Devices

§ List of Rejected Provisional Ballots and reason for rejection

§ Ballot and Seal Certificates

§ Hand Delivery of a Ballot by Mail Roster and Forms

§ Receipts of Sealed Early Voting Ballot Boxes

o Signature Verification Committee Materials

o Early Voting Ballot Board Materials, including:

§ Receipt of Sealed Early Voting Ballot Boxes

§ Poll List of Mail Voters

§ Notice of Rejected Carriers and reasons

o Central Counting Station Plan

o Training Materials

- County election officials must retain these records for 22 months under both federal law (52 USC 20701) and state law (Texas Election Code Sec. 66.058).

- All of this information is available to the general public (Sec. 1.012).

- After a thorough examination of the abovementioned records and materials in each county, irregularities or deviations from election administration procedures that may have affected the accuracy of the electronic voting system ballot count could trigger a full manual recount of ballots in the affected precincts or polling locations, pursuant to the Secretary of State's authority to ensure the accuracy of the tabulation of electronic voting system results (Sec. 127.202).

Because this request is for the public good and citizens are interested in helping improve our election system, there should be minimal charge in this request. Electronic Copy is fine.

Thank you for your time and assistance.

All my best,

Lori Gallagher

5125290493

Sent from [Mail](#) for Windows

TEXAS PUBLIC INFORMATION ACT INFORMATION REQUEST FORM

For guidance regarding your rights as a requestor and the public information procedures adopted by this governmental body, you may review the governmental body's notice required under section 552.205 of the Government Code. You can find additional Public Information Act resources on the Office of the Attorney General's website at <http://www.texasattorneygeneral.gov/open-government>.

Requestor Contact Information

First Name: _____ Last Name: _____
Company/Organization: _____
Mailing Address: _____
City: _____ State: _____ Zip Code: _____
E-mail Address: _____ Phone Number: _____
Preferred Manner of Written Communication: _____

Description of the Information Requested

(Note: Describe the information as precisely as you can.)

Range (optional): From: _____ to: _____

Under the Public Information Act, some categories of information do not have to be released. Exceptions to disclosure fall into two general categories: 1) mandatory exceptions that make information confidential and require a governmental body to withhold information, and 2) discretionary exceptions that allow but do not require a governmental body to withhold information. You may find information about mandatory and discretionary exceptions [HERE](#).

In most instances, a governmental body is required to request a decision from the Attorney General in order to withhold information from a requestor. However, a requestor may permit a governmental body to redact information without requesting an Attorney General decision. You are not required to agree to the redaction of any information responsive to your request, but doing so may streamline the handling of your request. If you agree to redactions in this request, then you may request the redacted information in a future information request.

- Do you agree to the redaction of information that is subject to mandatory exceptions, provided such redactions are clearly labeled on the information you received?
- Do you agree to the redaction of information that is subject to discretionary exceptions, provided such redactions are clearly labeled on the information you receive?

INFORMATION PREFERENCES:

- How would you like to have the information provided?
- If available, do you wish to receive an electronic copy of the information?

Please Note: If the information requested is unclear or if a large amount of information is requested you may be contacted to discuss clarifying or narrowing your request. There may be charges associated with production of the requested information. You may find more information regarding the charges under the Public Information Act [HERE](#).

From: [GeneralCounsel](#)
To: [REDACTED]; [REDACTED]
Subject: RE: PIA REQUEST
Date: Wednesday, December 1, 2021 3:47:21 PM
Attachments: Public-Information-Request-Form-10-01-19.pdf

Thank you for contacting the Office of the Texas Secretary of State. Your email was forwarded to the General Counsel for response. This email acknowledges receipt of your request for information under the Public Information Act, and we will process it in accordance with Chapter 552 of the Texas Government Code.

We will let you know if we have any questions or need clarification.

Regards,
Office of the Texas Secretary of State

From: Ryan Gallagher [REDACTED]
Sent: Monday, November 29, 2021 7:52 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: PIA REQUEST

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Please provide all electronic and/or paper correspondence between ES&S and Keith Ingram from July 01, 2020-November 29, 2021.

Please provide any and all emails, phone, and/or written correspondence between Keith Ingram and Christopher Davis between the dates January 01, 2020 -November 29, 2021.

Please provide any and all emails, phone calls, and/ or written notes or mailed correspondence between the Secretary of State, ES & S, and/or Election Assistance Commission between 01/01/2020 and 11/29/2021;

Please provide any and all emails to and/or from Brian Mechler between 01/01/2020 through 11/29/2021;

Please provide any and all emails to and/or from the following State employees: Brandon Hurly, Keith Ingram, Josa Esparza, with the keywords "problem," "electronic," "issue," "hash," "ES&S," "ballot," "vulnerability," and/or "vendor" between 01/01/2020 and 11/29/2021;

Please provide a copy of all complaints the Texas Secretary of State received filed by voters for the November 3rd Joint General Election, received by email, mail, or web form. Please provide copies of the complaints received between 01/01/2020 and 11/29/2020;

Please provide a copy of all names of public information act requestors between 11/2020 and 11/2021 for Election Records.

Please provide a copy of all records, emails, calls, or logs regarding electronic election system malfunction, or failure in November 03, 2020 JOint General Election, including for the Early Voting in Person Period beginning 10/13/2020, through 10/30/2020 and Election Day in Person

Please provide a copy of all money paid to voter registrars for registering and canceling voters for the 2020 Election Cycle and Year.

Please provide a copy of all logs of calls into SOS voter fraud hotline and helpline for the period of October 2020 through December 2020.

This information is for the public good and will improve voter confidence and system improvements.

Thank you for filling my request quickly.

All my best,

Lori Gallagher

5125290493

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From: [GeneralCounsel](#)
To: [REDACTED]
Cc: [GeneralCounsel](#); [Elections Internet](#)
Subject: RE: PIA REQUEST
Date: Tuesday, December 14, 2021 8:45:57 PM
Attachments: 12-14-21 Response and Request for Clarification - Gallagher PIR 21-1129.pdf
2020pmc_Gallagher PIR 21-1129.xlsx

Ms. Gallagher,

Your below email was forwarded to the General Counsel for response. Please see the attached letter, with enclosure, in response to your November 29, 2021 request for information under Chapter 552 of the Texas Government Code.

Sincerely,

Adam Bitter

General Counsel

Office of the Texas Secretary of State

From: Ryan Gallagher [REDACTED] >
Sent: Monday, November 29, 2021 7:31 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: PIA REQUEST

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Dallas, Harris, Tarrant, and Collin Counties, with Williamson, Hays, and Travis included.

Phase 1: Testing Voting Machine Accuracy, Cybersecurity Assessments, and Identifying and Removing Ineligible Voters Who Cast Ballots in 2020 (Already Completed or Underway)

- Please provide a copy of all cybersecurity assessments and lists of ineligible voters who cast ballots in 2020.

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•

As part of the audit process, the office has received reports from the Electronic Registration Information Center (ERIC) regarding voters who may have voted twice in state and across state lines.

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Once that action has been taken, our office evaluates the persons cancelled and refers any instances of possible illegal voting to the Office of the Texas Attorney General for investigation (Sec. 31.006).

Phase 2: Comprehensive Election Records Examination (Spring 2022)

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Please provide a copy of the following documents and forms for Williamson, Hays, Travis, Harris, Tarrant, Dallas, and Collin Counties.

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Test Deck Records

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o Early Voting and Election Day Materials, including:

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§ Statements of Residence

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§ Audit Logs from applicable Voting System Devices

§ List of Rejected Provisional Ballots and reason for rejection

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o Signature Verification Committee Materials

o Early Voting Ballot Board Materials, including:

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o Training Materials

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Because this request is for the public good and citizens are interested in helping improve our election system, there should be minimal charge in this request. Electronic Copy is fine.

Thank you for your time and assistance.

All my best,

Lori Gallagher

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Sent from [Mail](#) for Windows

The State of Texas

Executive Division
Capitol Building, 1E.8
P.O. Box 12887
Austin, Texas 78711-2887



Phone: 512-463-5770
Fax: 512-475-2761
Dial 7-1-1 For Relay Services
www.sos.texas.gov

John B. Scott
Secretary of State

December 14, 2021

Lori Gallagher

Sent via Electronic Mail to: [REDACTED]; [REDACTED]

Re: Request for records, considered received: November 30, 2021 (SOS PIR No. 21-1129)

Dear Ms. Gallagher:

This letter responds to your request for information under the Public Information Act, Chapter 552 of the Texas Government Code (the "PIA"), which was sent to the Office of the Texas Secretary of State (the "Office") via email after business hours on November 29, 2021 and is considered received on November 30, 2021 (the "Request"). In the Request, you indicate that you are seeking the following records regarding Dallas, Harris, Tarrant, Collin, Williamson, Hays, and Travis counties:

Phase 1: Testing Voting Machine Accuracy, Cybersecurity Assessments, and Identifying and Removing Ineligible Voters Who Cast Ballots in 2020

1. *Please provide a copy of:*
 - a. *all cybersecurity assessments and*
 - b. *lists of ineligible voters who cast ballots in 2020.*
2. *Please provide results to partial manual count of electronic voting system ballots for Williamson, Dallas, Harris, Tarrant, Collin, Travis, and Hays Counties.*
3. *Please provide ESA for all 254 Counties.*
4. *Please provide list of all voters that had a change in voter information and filled out [a] "Change of Voter Information Form" for 2020 Election year in Williamson, Dallas, Harris, Tarrant, Collin, Travis, and Hays Counties.*
5. *Please provide reports from ERIC with list of voters that voted twice and those from across state lines.*
6. *Please provide:*
 - a. *a copy of [a report of persons who may have been deceased when a vote was cast in their name] and*
 - b. *any communications with key words "deceased" in the body.*

7. *Please provide list of potential non-US citizen voters that have been identified in Texas and the list of canceled voter registrations.*

Phase 2: Comprehensive Election Records Examination (Spring 2022)

Please provide a copy of the following documents and forms for Williamson, Hays, Travis, Harris, Tarrant, Dallas, and Collin Counties.

- *Logic & Accuracy Testing Records for Voting Machines, including:*
 - *All test ballots voted*
 - *Test Deck Records*
 - *Testing Media*

- *Early Voting and Election Day Materials, including:*
 - *List of registered voters used in the 2020 General Election*
 - *Daily Early Voting Rosters for in-person voting*
 - *Chain of Custody forms that document the seals on the ballot boxes*
 - *Chain of Custody delivery and pickup of equipment at voting sites*
 - *Statements of Residence*
 - *Reasonable Impediment Declarations*
 - *Limited Ballot Applications*
 - *Audit Logs from applicable Voting System Devices*
 - *List of Rejected Provisional Ballots and reason for rejection*
 - *Ballot and Seal Certificates*
 - *Hand Delivery of a Ballot by Mail Roster and Forms*
 - *Receipts of Sealed Early Voting Ballot Boxes*

- *Signature Verification Committee Materials*

- *Early Voting Ballot Board Materials, including:*
 - *Receipt of Sealed Early Voting Ballot Boxes*
 - *Poll List of Mail Voters*
 - *Notice of Rejected Carriers and reasons*

- *Central Counting Station Plan*

- *Training Materials*

We are processing your Request in accordance with the terms of the PIA.¹ To that end, the Office maintains no documents responsive to Item 3 of the Request seeking the “ESA for all 254 Counties.” We also do not currently maintain any of the documents referenced in the “Phase 2”

¹ The PIA applies only to information in existence as of the date that the governmental entity receives the request and thus does not require the entity to create new information in response to a request or comply with a continuing request to supply information on a periodic basis as such information is prepared in the future. *See* Tex. Gov’t Code §§ 552.002, .021, .227, .351; *A&T Consultants, Inc. v. Sharp*, 904 S.W.2d 668, 676 (Tex. 1995); *Fish v. Dallas Indep. Sch. Dist.*, 31 S.W.3d 678, 681 (Tex. App.—Eastland 2000, pet. denied); Tex. Att’y Gen. Op. JM-48 at 2 (1983); Open Records Decision Nos. 476 at 1 (1987), 465 at 1 (1987), 452 at 2–3 (1986), 342 at 3 (1982).

portion of the Request. Please find the attached information in response to Item 2 of the Request seeking certain records relating to the partial manual count for the November 2020 general election in the specified counties.

CLARIFICATION REQUEST/NOTICE OF APPLICATION OF SEC. 552.222

In order to fulfill the remainder of the Request, we need clarification regarding the scope and type of records that you are seeking to obtain from the Secretary of State's office. Clarifying or narrowing the scope of your request may help avoid the production of, and potential charges for, responsive information that you are not interested in receiving. It also may allow us to produce responsive documents to you more quickly. Additionally, we may be able to avoid having to withhold certain information under the Public Information Act and seek a ruling from the Office of the Attorney General regarding the release of such records.

To that end, please clarify or narrow your inquiry by responding to the following items:

1. Please clarify what you mean by “cybersecurity assessments” in Item 1a of the Request. If you are seeking documents related to election security assessments, our Office does not maintain responsive information (as noted above). If you are referring to another type of assessment, please provide additional details regarding the requested records so that we can appropriately determine whether we maintain any responsive materials. Depending on your clarification, the requested information may be exempt from public disclosure under one or more Public Information Act exceptions.²
2. Information responsive to Items 1b, 5, 6a, and 7 of the Request may be exempt from public disclosure under the Public Information Act, including the names and other identifying information of voters. *See* Tex. Gov't Code §§ 552.101, 552.103. If your inquiry encompasses such identifying information, we would have to seek a ruling from the Attorney General allowing us to withhold responsive information that we believe is confidential under the PIA. Are you willing to narrow Items 1b, 5, 6a, and 7 of the Request to *aggregate numbers* of voters covered by the referenced activities? If so, our Office may be able to generate a report containing such figures without having to request a ruling from the Attorney General.³
3. As to Item 4 of the Request, please clarify the “voter information” changes that you are seeking from our Office. Although the statewide voter registration database maintained by the Secretary of State's office may reflect certain list maintenance activity in connection with changes in a voter's registration record, the Office does not initiate such activity at the state level and any form completed by the voter would be submitted to, and retained by, the county voter registrar in its records.
4. As to Item 6b of the Request, which seeks “any communications with key words ‘deceased’ in the body”:

² *See, e.g.*, Tex. Gov't Code §§ 552.101 (excepting from public disclosure any “information considered to be confidential by law, either constitutional, statutory, or by judicial decision”); 552.139 (excepting information related to “computer network security” and the “design, operation, or defense of a computer network”).

³ Our website also contains reports of aggregate numbers of voter registration cancellations (statewide and county by county) at <https://www.sos.texas.gov/elections/team/cancellation-trend-reports/index.shtml>.

- a. Will you agree to narrow this portion of your Request to communications sent by or to *certain* employees in the Secretary of State's office? If so, please identify the employees (or categories of employees) covered by Item 6b of the Request. Narrowing your inquiry to a subset of Secretary of State employees would reduce the total time that we would have to spend responding to this part of the Request.⁴
- b. Are you seeking (1) communications that Secretary of State employees sent to or received from *external* sources (*i.e.*, individuals and entities outside the Secretary of State's office); (2) *internal* communications exchanged solely among Secretary of State employees; or (3) both?
- c. Please provide a specific date range for the information you are seeking.

Depending on your clarification, we may have to provide you a statement of estimated costs pursuant to Section 552.2615 of the Texas Government Code. Likewise, providing the requested information may require programming and/or manipulation of data and would be available only at a cost that covers such programming or manipulation. *See* Tex. Gov't Code § 552.231. In addition, some responsive information may be exempted from public disclosure under the PIA. However, we cannot make any of these determinations until we receive a clarified request from you.

Under Section 552.222 of the PIA, if you do not respond in writing to this request for clarification within sixty-one days of this communication, your request for information is deemed by Texas law to be withdrawn. The Secretary of State is a strong supporter of open government, and this Office is ready and willing to respond to any and all public information requests. However, we must require that requests provide sufficient detail regarding the records being sought so that we may fulfill our duties under the PIA.

If you have any questions or need additional information, or if you would like to submit a clarified request, please contact our office at (512) 463-5770 or at the e-mail address listed below.

Sincerely,



Adam Bitter
General Counsel
Office of the Texas Secretary of State
generalcounsel@sos.texas.gov
AB/jw

Enclosure

⁴ We are amenable to working with you to determine an appropriate custodian set for the information you are seeking to obtain in the Request.

| ID | COUNTYNO | CountyName | PARTY | PRECINCT | CORDER | VSID | CANDIDATE_NAME | VOTINGSYS | EVBMCC | EVBMCC | EVIPCC | EVIPMC | EDEC | EDMC | PROV | TXTEVBMCC | TXTEVBMCC | TXTEVIPC | TXTEVIPC | TXTEDEC | TXTEDEC | TXTPROV | ALTPC | TXALTPCT | |
|-----|----------|------------|-------|----------|--------|------|---------------------|------------|--------|--------|--------|--------|------|------|------|-----------|----------------------------|----------------------------|---------------------------|---------------------------|--------------------------|--------------------------|--------------------------|------------|--------------------|
| 625 | 43 | COLLIN | | 0 126 | 0 | 3 | CHRISTA CASTAÑEDA | ES&S DS200 | 0 | 0 | 1,273 | 1,270 | 27 | 27 | | 0 | txTEVBMCC-043-00-00003-126 | txTEVBMCC-043-00-00003-126 | txTEVIPC-043-00-00003-126 | txTEVIPC-043-00-00003-126 | txTEDEC-043-00-00003-126 | txTEDEC-043-00-00003-126 | txTPROV-043-00-00003-126 | First Meli | txALTPCT-043-0-126 |
| 626 | 43 | COLLIN | | 0 126 | 0 | 4 | CHRISTA CASTAÑEDA | ES&S DS450 | 123 | 123 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-00-00004-126 | txTEVBMCC-043-00-00004-126 | txTEVIPC-043-00-00004-126 | txTEVIPC-043-00-00004-126 | txTEDEC-043-00-00004-126 | txTEDEC-043-00-00004-126 | txTPROV-043-00-00004-126 | First Meli | txALTPCT-043-0-126 |
| 627 | 43 | COLLIN | | 0 126 | 0 | 6 | CHRISTA CASTAÑEDA | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-00-00006-126 | txTEVBMCC-043-00-00006-126 | txTEVIPC-043-00-00006-126 | txTEVIPC-043-00-00006-126 | txTEDEC-043-00-00006-126 | txTEDEC-043-00-00006-126 | txTPROV-043-00-00006-126 | First Meli | txALTPCT-043-0-126 |
| 628 | 43 | COLLIN | | 0 126 | 1 | 3 | KATIJA "KAT" GRUENE | ES&S DS200 | 0 | 0 | 27 | 27 | 2 | 2 | | 0 | txTEVBMCC-043-01-00003-126 | txTEVBMCC-043-01-00003-126 | txTEVIPC-043-01-00003-126 | txTEVIPC-043-01-00003-126 | txTEDEC-043-01-00003-126 | txTEDEC-043-01-00003-126 | txTPROV-043-01-00003-126 | First Meli | txALTPCT-043-0-126 |
| 629 | 43 | COLLIN | | 0 126 | 1 | 4 | KATIJA "KAT" GRUENE | ES&S DS450 | 5 | 5 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-01-00004-126 | txTEVBMCC-043-01-00004-126 | txTEVIPC-043-01-00004-126 | txTEVIPC-043-01-00004-126 | txTEDEC-043-01-00004-126 | txTEDEC-043-01-00004-126 | txTPROV-043-01-00004-126 | First Meli | txALTPCT-043-0-126 |
| 630 | 43 | COLLIN | | 0 126 | 1 | 6 | KATIJA "KAT" GRUENE | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-01-00006-126 | txTEVBMCC-043-01-00006-126 | txTEVIPC-043-01-00006-126 | txTEVIPC-043-01-00006-126 | txTEDEC-043-01-00006-126 | txTEDEC-043-01-00006-126 | txTPROV-043-01-00006-126 | First Meli | txALTPCT-043-0-126 |
| 631 | 43 | COLLIN | | 0 126 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 75 | 75 | 5 | 5 | | 0 | txTEVBMCC-043-02-00003-126 | txTEVBMCC-043-02-00003-126 | txTEVIPC-043-02-00003-126 | txTEVIPC-043-02-00003-126 | txTEDEC-043-02-00003-126 | txTEDEC-043-02-00003-126 | txTPROV-043-02-00003-126 | First Meli | txALTPCT-043-0-126 |
| 632 | 43 | COLLIN | | 0 126 | 2 | 4 | MATT STERETT | ES&S DS450 | 4 | 4 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-02-00004-126 | txTEVBMCC-043-02-00004-126 | txTEVIPC-043-02-00004-126 | txTEVIPC-043-02-00004-126 | txTEDEC-043-02-00004-126 | txTEDEC-043-02-00004-126 | txTPROV-043-02-00004-126 | First Meli | txALTPCT-043-0-126 |
| 633 | 43 | COLLIN | | 0 126 | 2 | 6 | MATT STERETT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-02-00006-126 | txTEVBMCC-043-02-00006-126 | txTEVIPC-043-02-00006-126 | txTEVIPC-043-02-00006-126 | txTEDEC-043-02-00006-126 | txTEDEC-043-02-00006-126 | txTPROV-043-02-00006-126 | First Meli | txALTPCT-043-0-126 |
| 634 | 43 | COLLIN | | 0 126 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 1,531 | 1,527 | 141 | 141 | | 0 | txTEVBMCC-043-03-00003-126 | txTEVBMCC-043-03-00003-126 | txTEVIPC-043-03-00003-126 | txTEVIPC-043-03-00003-126 | txTEDEC-043-03-00003-126 | txTEDEC-043-03-00003-126 | txTPROV-043-03-00003-126 | First Meli | txALTPCT-043-0-126 |
| 635 | 43 | COLLIN | | 0 126 | 3 | 4 | JAMES "JIM" WRIGHT | ES&S DS450 | 66 | 65 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-03-00004-126 | txTEVBMCC-043-03-00004-126 | txTEVIPC-043-03-00004-126 | txTEVIPC-043-03-00004-126 | txTEDEC-043-03-00004-126 | txTEDEC-043-03-00004-126 | txTPROV-043-03-00004-126 | First Meli | txALTPCT-043-0-126 |
| 636 | 43 | COLLIN | | 0 126 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-03-00006-126 | txTEVBMCC-043-03-00006-126 | txTEVIPC-043-03-00006-126 | txTEVIPC-043-03-00006-126 | txTEDEC-043-03-00006-126 | txTEDEC-043-03-00006-126 | txTPROV-043-03-00006-126 | First Meli | txALTPCT-043-0-126 |
| 637 | 43 | COLLIN | | 0 209 | 0 | 3 | CHRISTA CASTAÑEDA | ES&S DS200 | 0 | 0 | 244 | 243 | 154 | 154 | | 0 | txTEVBMCC-043-00-00003-209 | txTEVBMCC-043-00-00003-209 | txTEVIPC-043-00-00003-209 | txTEVIPC-043-00-00003-209 | txTEDEC-043-00-00003-209 | txTEDEC-043-00-00003-209 | txTPROV-043-00-00003-209 | Josephine | txALTPCT-043-0-209 |
| 638 | 43 | COLLIN | | 0 209 | 0 | 4 | CHRISTA CASTAÑEDA | ES&S DS450 | 21 | 21 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-00-00004-209 | txTEVBMCC-043-00-00004-209 | txTEVIPC-043-00-00004-209 | txTEVIPC-043-00-00004-209 | txTEDEC-043-00-00004-209 | txTEDEC-043-00-00004-209 | txTPROV-043-00-00004-209 | Josephine | txALTPCT-043-0-209 |
| 639 | 43 | COLLIN | | 0 209 | 0 | 6 | CHRISTA CASTAÑEDA | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-00-00006-209 | txTEVBMCC-043-00-00006-209 | txTEVIPC-043-00-00006-209 | txTEVIPC-043-00-00006-209 | txTEDEC-043-00-00006-209 | txTEDEC-043-00-00006-209 | txTPROV-043-00-00006-209 | Josephine | txALTPCT-043-0-209 |
| 640 | 43 | COLLIN | | 0 209 | 1 | 3 | KATIJA "KAT" GRUENE | ES&S DS200 | 0 | 0 | 8 | 8 | 4 | 4 | | 0 | txTEVBMCC-043-01-00003-209 | txTEVBMCC-043-01-00003-209 | txTEVIPC-043-01-00003-209 | txTEVIPC-043-01-00003-209 | txTEDEC-043-01-00003-209 | txTEDEC-043-01-00003-209 | txTPROV-043-01-00003-209 | Josephine | txALTPCT-043-0-209 |
| 641 | 43 | COLLIN | | 0 209 | 1 | 4 | KATIJA "KAT" GRUENE | ES&S DS450 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-01-00004-209 | txTEVBMCC-043-01-00004-209 | txTEVIPC-043-01-00004-209 | txTEVIPC-043-01-00004-209 | txTEDEC-043-01-00004-209 | txTEDEC-043-01-00004-209 | txTPROV-043-01-00004-209 | Josephine | txALTPCT-043-0-209 |
| 642 | 43 | COLLIN | | 0 209 | 1 | 6 | KATIJA "KAT" GRUENE | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-01-00006-209 | txTEVBMCC-043-01-00006-209 | txTEVIPC-043-01-00006-209 | txTEVIPC-043-01-00006-209 | txTEDEC-043-01-00006-209 | txTEDEC-043-01-00006-209 | txTPROV-043-01-00006-209 | Josephine | txALTPCT-043-0-209 |
| 643 | 43 | COLLIN | | 0 209 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 18 | 18 | 13 | 13 | | 0 | txTEVBMCC-043-02-00003-209 | txTEVBMCC-043-02-00003-209 | txTEVIPC-043-02-00003-209 | txTEVIPC-043-02-00003-209 | txTEDEC-043-02-00003-209 | txTEDEC-043-02-00003-209 | txTPROV-043-02-00003-209 | Josephine | txALTPCT-043-0-209 |
| 644 | 43 | COLLIN | | 0 209 | 2 | 4 | MATT STERETT | ES&S DS450 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-02-00004-209 | txTEVBMCC-043-02-00004-209 | txTEVIPC-043-02-00004-209 | txTEVIPC-043-02-00004-209 | txTEDEC-043-02-00004-209 | txTEDEC-043-02-00004-209 | txTPROV-043-02-00004-209 | Josephine | txALTPCT-043-0-209 |
| 645 | 43 | COLLIN | | 0 209 | 2 | 6 | MATT STERETT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-02-00006-209 | txTEVBMCC-043-02-00006-209 | txTEVIPC-043-02-00006-209 | txTEVIPC-043-02-00006-209 | txTEDEC-043-02-00006-209 | txTEDEC-043-02-00006-209 | txTPROV-043-02-00006-209 | Josephine | txALTPCT-043-0-209 |
| 646 | 43 | COLLIN | | 0 209 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 341 | 340 | 137 | 137 | | 0 | txTEVBMCC-043-03-00003-209 | txTEVBMCC-043-03-00003-209 | txTEVIPC-043-03-00003-209 | txTEVIPC-043-03-00003-209 | txTEDEC-043-03-00003-209 | txTEDEC-043-03-00003-209 | txTPROV-043-03-00003-209 | Josephine | txALTPCT-043-0-209 |
| 647 | 43 | COLLIN | | 0 209 | 3 | 4 | JAMES "JIM" WRIGHT | ES&S DS450 | 11 | 11 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-03-00004-209 | txTEVBMCC-043-03-00004-209 | txTEVIPC-043-03-00004-209 | txTEVIPC-043-03-00004-209 | txTEDEC-043-03-00004-209 | txTEDEC-043-03-00004-209 | txTPROV-043-03-00004-209 | Josephine | txALTPCT-043-0-209 |
| 648 | 43 | COLLIN | | 0 209 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-03-00006-209 | txTEVBMCC-043-03-00006-209 | txTEVIPC-043-03-00006-209 | txTEVIPC-043-03-00006-209 | txTEDEC-043-03-00006-209 | txTEDEC-043-03-00006-209 | txTPROV-043-03-00006-209 | Josephine | txALTPCT-043-0-209 |
| 649 | 43 | COLLIN | | 0 66 | 0 | 3 | CHRISTA CASTAÑEDA | ES&S DS200 | 0 | 0 | 595 | 594 | 30 | 30 | | 0 | txTEVBMCC-043-00-00003-66 | txTEVBMCC-043-00-00003-66 | txTEVIPC-043-00-00003-66 | txTEVIPC-043-00-00003-66 | txTEDEC-043-00-00003-66 | txTEDEC-043-00-00003-66 | txTPROV-043-00-00003-66 | Richardson | txALTPCT-043-0-66 |
| 650 | 43 | COLLIN | | 0 66 | 0 | 4 | CHRISTA CASTAÑEDA | ES&S DS450 | 86 | 84 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-00-00004-66 | txTEVBMCC-043-00-00004-66 | txTEVIPC-043-00-00004-66 | txTEVIPC-043-00-00004-66 | txTEDEC-043-00-00004-66 | txTEDEC-043-00-00004-66 | txTPROV-043-00-00004-66 | Richardson | txALTPCT-043-0-66 |
| 651 | 43 | COLLIN | | 0 66 | 0 | 6 | CHRISTA CASTAÑEDA | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-00-00006-66 | txTEVBMCC-043-00-00006-66 | txTEVIPC-043-00-00006-66 | txTEVIPC-043-00-00006-66 | txTEDEC-043-00-00006-66 | txTEDEC-043-00-00006-66 | txTPROV-043-00-00006-66 | Richardson | txALTPCT-043-0-66 |
| 652 | 43 | COLLIN | | 0 66 | 1 | 3 | KATIJA "KAT" GRUENE | ES&S DS200 | 0 | 0 | 12 | 12 | 1 | 1 | | 0 | txTEVBMCC-043-01-00003-66 | txTEVBMCC-043-01-00003-66 | txTEVIPC-043-01-00003-66 | txTEVIPC-043-01-00003-66 | txTEDEC-043-01-00003-66 | txTEDEC-043-01-00003-66 | txTPROV-043-01-00003-66 | Richardson | txALTPCT-043-0-66 |
| 653 | 43 | COLLIN | | 0 66 | 1 | 4 | KATIJA "KAT" GRUENE | ES&S DS450 | 4 | 3 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-01-00004-66 | txTEVBMCC-043-01-00004-66 | txTEVIPC-043-01-00004-66 | txTEVIPC-043-01-00004-66 | txTEDEC-043-01-00004-66 | txTEDEC-043-01-00004-66 | txTPROV-043-01-00004-66 | Richardson | txALTPCT-043-0-66 |
| 654 | 43 | COLLIN | | 0 66 | 1 | 6 | KATIJA "KAT" GRUENE | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | txTEVBMCC-043-01-00006-66 | txTEVBMCC-043-01-00006-66 | txTEVIPC-043-01-00006-66 | txTEVIPC-043-01-00006-66 | txTEDEC-043-01-00006-66 | txTEDEC-043-01-00006-66 | txTPROV-043-01-00006-66 | Richardson | txALTPCT-043-0-66 |



| | | | | | | | | | | | | | | | | | | | | | | | | |
|-----|----|--------|--------|---|---|---------------------|------------|----|----|-----|-----|-----|-----|---|---|------------------------------|------------------------------|------------------------------|------------------------------|----------------------------|----------------------------|----------------------------|------------|---------------------|
| 655 | 43 | COLLIN | 0 66 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 0 | 32 | 31 | 9 | 9 | 0 | txEVBMEC-043-0-02-00003-66 | txEVBMMC-043-0-02-00003-66 | txEVIPEC-043-0-02-00003-66 | txEVIPMC-043-0-02-00003-66 | txEDEC-043-0-02-00003-66 | txEDMC-043-0-02-00003-66 | txPROV-043-0-02-00003-66 | Richardson | txALTPCT-043-0-66 |
| 656 | 43 | COLLIN | 0 66 | 2 | 4 | MATT STERETT | ES&S DS450 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-043-0-02-00004-66 | txEVBMMC-043-0-02-00004-66 | txEVIPEC-043-0-02-00004-66 | txEVIPMC-043-0-02-00004-66 | txEDEC-043-0-02-00004-66 | txEDMC-043-0-02-00004-66 | txPROV-043-0-02-00004-66 | Richardson | txALTPCT-043-0-66 |
| 657 | 43 | COLLIN | 0 66 | 2 | 6 | MATT STERETT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-043-0-02-00006-66 | txEVBMMC-043-0-02-00006-66 | txEVIPEC-043-0-02-00006-66 | txEVIPMC-043-0-02-00006-66 | txEDEC-043-0-02-00006-66 | txEDMC-043-0-02-00006-66 | txPROV-043-0-02-00006-66 | Richardson | txALTPCT-043-0-66 |
| 658 | 43 | COLLIN | 0 66 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 627 | 626 | 87 | 87 | 0 | 0 | txEVBMEC-043-0-03-00003-66 | txEVBMMC-043-0-03-00003-66 | txEVIPEC-043-0-03-00003-66 | txEVIPMC-043-0-03-00003-66 | txEDEC-043-0-03-00003-66 | txEDMC-043-0-03-00003-66 | txPROV-043-0-03-00003-66 | Richardson | txALTPCT-043-0-66 |
| 659 | 43 | COLLIN | 0 66 | 3 | 4 | JAMES "JIM" WRIGHT | ES&S DS450 | 51 | 50 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-043-0-03-00004-66 | txEVBMMC-043-0-03-00004-66 | txEVIPEC-043-0-03-00004-66 | txEVIPMC-043-0-03-00004-66 | txEDEC-043-0-03-00004-66 | txEDMC-043-0-03-00004-66 | txPROV-043-0-03-00004-66 | Richardson | txALTPCT-043-0-66 |
| 660 | 43 | COLLIN | 0 66 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-043-0-03-00006-66 | txEVBMMC-043-0-03-00006-66 | txEVIPEC-043-0-03-00006-66 | txEVIPMC-043-0-03-00006-66 | txEDEC-043-0-03-00006-66 | txEDMC-043-0-03-00006-66 | txPROV-043-0-03-00006-66 | Richardson | txALTPCT-043-0-66 |
| 829 | 57 | DALLAS | 0 1062 | 0 | 3 | CHRISTA CASTAÑEDA | ES&S DS200 | 0 | 0 | 10 | 10 | 54 | 54 | 0 | 0 | txEVBMEC-057-0-00-00003-1062 | txEVBMMC-057-0-00-00003-1062 | txEVIPEC-057-0-00-00003-1062 | txEVIPMC-057-0-00-00003-1062 | txEDEC-057-0-00-00003-1062 | txEDMC-057-0-00-00003-1062 | txPROV-057-0-00-00003-1062 | 2006 | txALTPCT-057-0-1062 |
| 830 | 57 | DALLAS | 0 1062 | 0 | 6 | CHRISTA CASTAÑEDA | ES&S DS850 | 2 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-00-00006-1062 | txEVBMMC-057-0-00-00006-1062 | txEVIPEC-057-0-00-00006-1062 | txEVIPMC-057-0-00-00006-1062 | txEDEC-057-0-00-00006-1062 | txEDMC-057-0-00-00006-1062 | txPROV-057-0-00-00006-1062 | 2006 | txALTPCT-057-0-1062 |
| 831 | 57 | DALLAS | 0 1062 | 1 | 3 | KATJIA "KAT" GRUENE | ES&S DS200 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | txEVBMEC-057-0-01-00003-1062 | txEVBMMC-057-0-01-00003-1062 | txEVIPEC-057-0-01-00003-1062 | txEVIPMC-057-0-01-00003-1062 | txEDEC-057-0-01-00003-1062 | txEDMC-057-0-01-00003-1062 | txPROV-057-0-01-00003-1062 | 2006 | txALTPCT-057-0-1062 |
| 832 | 57 | DALLAS | 0 1062 | 1 | 6 | KATJIA "KAT" GRUENE | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-01-00006-1062 | txEVBMMC-057-0-01-00006-1062 | txEVIPEC-057-0-01-00006-1062 | txEVIPMC-057-0-01-00006-1062 | txEDEC-057-0-01-00006-1062 | txEDMC-057-0-01-00006-1062 | txPROV-057-0-01-00006-1062 | 2006 | txALTPCT-057-0-1062 |
| 833 | 57 | DALLAS | 0 1062 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 0 | 0 | 0 | 5 | 5 | 0 | txEVBMEC-057-0-02-00003-1062 | txEVBMMC-057-0-02-00003-1062 | txEVIPEC-057-0-02-00003-1062 | txEVIPMC-057-0-02-00003-1062 | txEDEC-057-0-02-00003-1062 | txEDMC-057-0-02-00003-1062 | txPROV-057-0-02-00003-1062 | 2006 | txALTPCT-057-0-1062 |
| 834 | 57 | DALLAS | 0 1062 | 2 | 6 | MATT STERETT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-02-00006-1062 | txEVBMMC-057-0-02-00006-1062 | txEVIPEC-057-0-02-00006-1062 | txEVIPMC-057-0-02-00006-1062 | txEDEC-057-0-02-00006-1062 | txEDMC-057-0-02-00006-1062 | txPROV-057-0-02-00006-1062 | 2006 | txALTPCT-057-0-1062 |
| 835 | 57 | DALLAS | 0 1062 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 6 | 6 | 82 | 82 | 0 | 0 | txEVBMEC-057-0-03-00003-1062 | txEVBMMC-057-0-03-00003-1062 | txEVIPEC-057-0-03-00003-1062 | txEVIPMC-057-0-03-00003-1062 | txEDEC-057-0-03-00003-1062 | txEDMC-057-0-03-00003-1062 | txPROV-057-0-03-00003-1062 | 2006 | txALTPCT-057-0-1062 |
| 836 | 57 | DALLAS | 0 1062 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-03-00006-1062 | txEVBMMC-057-0-03-00006-1062 | txEVIPEC-057-0-03-00006-1062 | txEVIPMC-057-0-03-00006-1062 | txEDEC-057-0-03-00006-1062 | txEDMC-057-0-03-00006-1062 | txPROV-057-0-03-00006-1062 | 2006 | txALTPCT-057-0-1062 |
| 837 | 57 | DALLAS | 0 1111 | 0 | 3 | CHRISTA CASTAÑEDA | ES&S DS200 | 0 | 0 | 427 | 427 | 252 | 252 | 0 | 0 | txEVBMEC-057-0-00-00003-1111 | txEVBMMC-057-0-00-00003-1111 | txEVIPEC-057-0-00-00003-1111 | txEVIPMC-057-0-00-00003-1111 | txEDEC-057-0-00-00003-1111 | txEDMC-057-0-00-00003-1111 | txPROV-057-0-00-00003-1111 | 4607 | txALTPCT-057-0-1111 |
| 838 | 57 | DALLAS | 0 1111 | 0 | 6 | CHRISTA CASTAÑEDA | ES&S DS850 | 13 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-00-00006-1111 | txEVBMMC-057-0-00-00006-1111 | txEVIPEC-057-0-00-00006-1111 | txEVIPMC-057-0-00-00006-1111 | txEDEC-057-0-00-00006-1111 | txEDMC-057-0-00-00006-1111 | txPROV-057-0-00-00006-1111 | 4607 | txALTPCT-057-0-1111 |
| 839 | 57 | DALLAS | 0 1111 | 1 | 3 | KATJIA "KAT" GRUENE | ES&S DS200 | 0 | 0 | 8 | 8 | 5 | 5 | 0 | 0 | txEVBMEC-057-0-01-00003-1111 | txEVBMMC-057-0-01-00003-1111 | txEVIPEC-057-0-01-00003-1111 | txEVIPMC-057-0-01-00003-1111 | txEDEC-057-0-01-00003-1111 | txEDMC-057-0-01-00003-1111 | txPROV-057-0-01-00003-1111 | 4607 | txALTPCT-057-0-1111 |
| 840 | 57 | DALLAS | 0 1111 | 1 | 6 | KATJIA "KAT" GRUENE | ES&S DS850 | 2 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-01-00006-1111 | txEVBMMC-057-0-01-00006-1111 | txEVIPEC-057-0-01-00006-1111 | txEVIPMC-057-0-01-00006-1111 | txEDEC-057-0-01-00006-1111 | txEDMC-057-0-01-00006-1111 | txPROV-057-0-01-00006-1111 | 4607 | txALTPCT-057-0-1111 |
| 841 | 57 | DALLAS | 0 1111 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 1 | 11 | 15 | 15 | 0 | 0 | txEVBMEC-057-0-02-00003-1111 | txEVBMMC-057-0-02-00003-1111 | txEVIPEC-057-0-02-00003-1111 | txEVIPMC-057-0-02-00003-1111 | txEDEC-057-0-02-00003-1111 | txEDMC-057-0-02-00003-1111 | txPROV-057-0-02-00003-1111 | 4607 | txALTPCT-057-0-1111 |
| 842 | 57 | DALLAS | 0 1111 | 2 | 6 | MATT STERETT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-02-00006-1111 | txEVBMMC-057-0-02-00006-1111 | txEVIPEC-057-0-02-00006-1111 | txEVIPMC-057-0-02-00006-1111 | txEDEC-057-0-02-00006-1111 | txEDMC-057-0-02-00006-1111 | txPROV-057-0-02-00006-1111 | 4607 | txALTPCT-057-0-1111 |
| 843 | 57 | DALLAS | 0 1111 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 104 | 104 | 155 | 155 | 0 | 0 | txEVBMEC-057-0-03-00003-1111 | txEVBMMC-057-0-03-00003-1111 | txEVIPEC-057-0-03-00003-1111 | txEVIPMC-057-0-03-00003-1111 | txEDEC-057-0-03-00003-1111 | txEDMC-057-0-03-00003-1111 | txPROV-057-0-03-00003-1111 | 4607 | txALTPCT-057-0-1111 |
| 844 | 57 | DALLAS | 0 1111 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 8 | 8 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-03-00006-1111 | txEVBMMC-057-0-03-00006-1111 | txEVIPEC-057-0-03-00006-1111 | txEVIPMC-057-0-03-00006-1111 | txEDEC-057-0-03-00006-1111 | txEDMC-057-0-03-00006-1111 | txPROV-057-0-03-00006-1111 | 4607 | txALTPCT-057-0-1111 |
| 845 | 57 | DALLAS | 0 1726 | 0 | 3 | CHRISTA CASTAÑEDA | ES&S DS200 | 0 | 0 | 458 | 458 | 59 | 59 | 0 | 0 | txEVBMEC-057-0-00-00003-1726 | txEVBMMC-057-0-00-00003-1726 | txEVIPEC-057-0-00-00003-1726 | txEVIPMC-057-0-00-00003-1726 | txEDEC-057-0-00-00003-1726 | txEDMC-057-0-00-00003-1726 | txPROV-057-0-00-00003-1726 | 3102 | txALTPCT-057-0-1726 |
| 846 | 57 | DALLAS | 0 1726 | 0 | 6 | CHRISTA CASTAÑEDA | ES&S DS850 | 75 | 75 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-00-00006-1726 | txEVBMMC-057-0-00-00006-1726 | txEVIPEC-057-0-00-00006-1726 | txEVIPMC-057-0-00-00006-1726 | txEDEC-057-0-00-00006-1726 | txEDMC-057-0-00-00006-1726 | txPROV-057-0-00-00006-1726 | 3102 | txALTPCT-057-0-1726 |
| 847 | 57 | DALLAS | 0 1726 | 1 | 3 | KATJIA "KAT" GRUENE | ES&S DS200 | 0 | 0 | 15 | 15 | 1 | 1 | 0 | 0 | txEVBMEC-057-0-01-00003-1726 | txEVBMMC-057-0-01-00003-1726 | txEVIPEC-057-0-01-00003-1726 | txEVIPMC-057-0-01-00003-1726 | txEDEC-057-0-01-00003-1726 | txEDMC-057-0-01-00003-1726 | txPROV-057-0-01-00003-1726 | 3102 | txALTPCT-057-0-1726 |
| 848 | 57 | DALLAS | 0 1726 | 1 | 6 | KATJIA "KAT" GRUENE | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-01-00006-1726 | txEVBMMC-057-0-01-00006-1726 | txEVIPEC-057-0-01-00006-1726 | txEVIPMC-057-0-01-00006-1726 | txEDEC-057-0-01-00006-1726 | txEDMC-057-0-01-00006-1726 | txPROV-057-0-01-00006-1726 | 3102 | txALTPCT-057-0-1726 |
| 849 | 57 | DALLAS | 0 1726 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 2 | 2 | 1 | 1 | 0 | 0 | txEVBMEC-057-0-02-00003-1726 | txEVBMMC-057-0-02-00003-1726 | txEVIPEC-057-0-02-00003-1726 | txEVIPMC-057-0-02-00003-1726 | txEDEC-057-0-02-00003-1726 | txEDMC-057-0-02-00003-1726 | txPROV-057-0-02-00003-1726 | 3102 | txALTPCT-057-0-1726 |
| 850 | 57 | DALLAS | 0 1726 | 2 | 6 | MATT STERETT | ES&S DS850 | 2 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-02-00006-1726 | txEVBMMC-057-0-02-00006-1726 | txEVIPEC-057-0-02-00006-1726 | txEVIPMC-057-0-02-00006-1726 | txEDEC-057-0-02-00006-1726 | txEDMC-057-0-02-00006-1726 | txPROV-057-0-02-00006-1726 | 3102 | txALTPCT-057-0-1726 |
| 851 | 57 | DALLAS | 0 1726 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 330 | 330 | 30 | 30 | 0 | 0 | txEVBMEC-057-0-03-00003-1726 | txEVBMMC-057-0-03-00003-1726 | txEVIPEC-057-0-03-00003-1726 | txEVIPMC-057-0-03-00003-1726 | txEDEC-057-0-03-00003-1726 | txEDMC-057-0-03-00003-1726 | txPROV-057-0-03-00003-1726 | 3102 | txALTPCT-057-0-1726 |
| 852 | 57 | DALLAS | 0 1726 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 44 | 44 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-057-0-03-00006-1726 | txEVBMMC-057-0-03-00006-1726 | txEVIPEC-057-0-03-00006-1726 | txEVIPMC-057-0-03-00006-1726 | txEDEC-057-0-03-00006-1726 | txEDMC-057-0-03-00006-1726 | txPROV-057-0-03-00006-1726 | 3102 | txALTPCT-057-0-1726 |

| | | | | | | | | | | | | | | | | | | | | | | | |
|------|-----|------------|-------|---|---|---------------------|------------|-----|-----|-------|-------|-----|-----|---|-----------------------------|-----------------------------|-----------------------------|-----------------------------|---------------------------|---------------------------|---------------------------|------------|--------------------|
| 3341 | 246 | WILLIAMSON | 0 147 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 79 | 79 | 18 | 18 | 0 | txEVBMEC-246-0-02-00003-147 | txEVBMMC-246-0-02-00003-147 | txEVIPEC-246-0-02-00003-147 | txEVIPMC-246-0-02-00003-147 | txEDEC-246-0-02-00003-147 | txEDMC-246-0-02-00003-147 | txPROV-246-0-02-00003-147 | 162Gateway | txALTPCT-246-0-147 |
| 3342 | 246 | WILLIAMSON | 0 147 | 2 | 6 | MATT STERETT | ES&S DS850 | 5 | 5 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-02-00006-147 | txEVBMMC-246-0-02-00006-147 | txEVIPEC-246-0-02-00006-147 | txEVIPMC-246-0-02-00006-147 | txEDEC-246-0-02-00006-147 | txEDMC-246-0-02-00006-147 | txPROV-246-0-02-00006-147 | 162Gateway | txALTPCT-246-0-147 |
| 3343 | 246 | WILLIAMSON | 0 147 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 667 | 667 | 94 | 94 | 0 | txEVBMEC-246-0-03-00003-147 | txEVBMMC-246-0-03-00003-147 | txEVIPEC-246-0-03-00003-147 | txEVIPMC-246-0-03-00003-147 | txEDEC-246-0-03-00003-147 | txEDMC-246-0-03-00003-147 | txPROV-246-0-03-00003-147 | 162Gateway | txALTPCT-246-0-147 |
| 3344 | 246 | WILLIAMSON | 0 147 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 52 | 52 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-03-00006-147 | txEVBMMC-246-0-03-00006-147 | txEVIPEC-246-0-03-00006-147 | txEVIPMC-246-0-03-00006-147 | txEDEC-246-0-03-00006-147 | txEDMC-246-0-03-00006-147 | txPROV-246-0-03-00006-147 | 162Gateway | txALTPCT-246-0-147 |
| 3345 | 246 | WILLIAMSON | 0 371 | 0 | 3 | CHRISTA CASTAÑEDA | ES&S DS200 | 0 | 0 | 464 | 464 | 120 | 119 | 0 | txEVBMEC-246-0-00-00003-371 | txEVBMMC-246-0-00-00003-371 | txEVIPEC-246-0-00-00003-371 | txEVIPMC-246-0-00-00003-371 | txEDEC-246-0-00-00003-371 | txEDMC-246-0-00-00003-371 | txPROV-246-0-00-00003-371 | 185RattanC | txALTPCT-246-0-371 |
| 3346 | 246 | WILLIAMSON | 0 371 | 0 | 6 | CHRISTA CASTAÑEDA | ES&S DS850 | 177 | 177 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-00-00006-371 | txEVBMMC-246-0-00-00006-371 | txEVIPEC-246-0-00-00006-371 | txEVIPMC-246-0-00-00006-371 | txEDEC-246-0-00-00006-371 | txEDMC-246-0-00-00006-371 | txPROV-246-0-00-00006-371 | 185RattanC | txALTPCT-246-0-371 |
| 3347 | 246 | WILLIAMSON | 0 371 | 1 | 3 | KATJIA "KAT" GRUENE | ES&S DS200 | 0 | 0 | 18 | 18 | 13 | 13 | 0 | txEVBMEC-246-0-01-00003-371 | txEVBMMC-246-0-01-00003-371 | txEVIPEC-246-0-01-00003-371 | txEVIPMC-246-0-01-00003-371 | txEDEC-246-0-01-00003-371 | txEDMC-246-0-01-00003-371 | txPROV-246-0-01-00003-371 | 185RattanC | txALTPCT-246-0-371 |
| 3348 | 246 | WILLIAMSON | 0 371 | 1 | 6 | KATJIA "KAT" GRUENE | ES&S DS850 | 4 | 4 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-01-00006-371 | txEVBMMC-246-0-01-00006-371 | txEVIPEC-246-0-01-00006-371 | txEVIPMC-246-0-01-00006-371 | txEDEC-246-0-01-00006-371 | txEDMC-246-0-01-00006-371 | txPROV-246-0-01-00006-371 | 185RattanC | txALTPCT-246-0-371 |
| 3349 | 246 | WILLIAMSON | 0 371 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 38 | 38 | 23 | 23 | 0 | txEVBMEC-246-0-02-00003-371 | txEVBMMC-246-0-02-00003-371 | txEVIPEC-246-0-02-00003-371 | txEVIPMC-246-0-02-00003-371 | txEDEC-246-0-02-00003-371 | txEDMC-246-0-02-00003-371 | txPROV-246-0-02-00003-371 | 185RattanC | txALTPCT-246-0-371 |
| 3350 | 246 | WILLIAMSON | 0 371 | 2 | 6 | MATT STERETT | ES&S DS850 | 4 | 5 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-02-00006-371 | txEVBMMC-246-0-02-00006-371 | txEVIPEC-246-0-02-00006-371 | txEVIPMC-246-0-02-00006-371 | txEDEC-246-0-02-00006-371 | txEDMC-246-0-02-00006-371 | txPROV-246-0-02-00006-371 | 185RattanC | txALTPCT-246-0-371 |
| 3351 | 246 | WILLIAMSON | 0 371 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 1,017 | 1,017 | 128 | 128 | 0 | txEVBMEC-246-0-03-00003-371 | txEVBMMC-246-0-03-00003-371 | txEVIPEC-246-0-03-00003-371 | txEVIPMC-246-0-03-00003-371 | txEDEC-246-0-03-00003-371 | txEDMC-246-0-03-00003-371 | txPROV-246-0-03-00003-371 | 185RattanC | txALTPCT-246-0-371 |
| 3352 | 246 | WILLIAMSON | 0 371 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 145 | 145 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-03-00006-371 | txEVBMMC-246-0-03-00006-371 | txEVIPEC-246-0-03-00006-371 | txEVIPMC-246-0-03-00006-371 | txEDEC-246-0-03-00006-371 | txEDMC-246-0-03-00006-371 | txPROV-246-0-03-00006-371 | 185RattanC | txALTPCT-246-0-371 |
| 3353 | 246 | WILLIAMSON | 0 425 | 0 | 3 | CHRISTA CASTAÑEDA | ES&S DS200 | 0 | 0 | 72 | 72 | 138 | 138 | 0 | txEVBMEC-246-0-00-00003-425 | txEVBMMC-246-0-00-00003-425 | txEVIPEC-246-0-00-00003-425 | txEVIPMC-246-0-00-00003-425 | txEDEC-246-0-00-00003-425 | txEDMC-246-0-00-00003-425 | txPROV-246-0-00-00003-425 | 190FernBlu | txALTPCT-246-0-425 |
| 3354 | 246 | WILLIAMSON | 0 425 | 0 | 6 | CHRISTA CASTAÑEDA | ES&S DS850 | 21 | 21 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-00-00006-425 | txEVBMMC-246-0-00-00006-425 | txEVIPEC-246-0-00-00006-425 | txEVIPMC-246-0-00-00006-425 | txEDEC-246-0-00-00006-425 | txEDMC-246-0-00-00006-425 | txPROV-246-0-00-00006-425 | 190FernBlu | txALTPCT-246-0-425 |
| 3355 | 246 | WILLIAMSON | 0 425 | 1 | 3 | KATJIA "KAT" GRUENE | ES&S DS200 | 0 | 0 | 0 | 0 | 11 | 11 | 0 | txEVBMEC-246-0-01-00003-425 | txEVBMMC-246-0-01-00003-425 | txEVIPEC-246-0-01-00003-425 | txEVIPMC-246-0-01-00003-425 | txEDEC-246-0-01-00003-425 | txEDMC-246-0-01-00003-425 | txPROV-246-0-01-00003-425 | 190FernBlu | txALTPCT-246-0-425 |
| 3356 | 246 | WILLIAMSON | 0 425 | 1 | 6 | KATJIA "KAT" GRUENE | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-01-00006-425 | txEVBMMC-246-0-01-00006-425 | txEVIPEC-246-0-01-00006-425 | txEVIPMC-246-0-01-00006-425 | txEDEC-246-0-01-00006-425 | txEDMC-246-0-01-00006-425 | txPROV-246-0-01-00006-425 | 190FernBlu | txALTPCT-246-0-425 |
| 3357 | 246 | WILLIAMSON | 0 425 | 2 | 3 | MATT STERETT | ES&S DS200 | 0 | 0 | 5 | 5 | 22 | 22 | 0 | txEVBMEC-246-0-02-00003-425 | txEVBMMC-246-0-02-00003-425 | txEVIPEC-246-0-02-00003-425 | txEVIPMC-246-0-02-00003-425 | txEDEC-246-0-02-00003-425 | txEDMC-246-0-02-00003-425 | txPROV-246-0-02-00003-425 | 190FernBlu | txALTPCT-246-0-425 |
| 3358 | 246 | WILLIAMSON | 0 425 | 2 | 6 | MATT STERETT | ES&S DS850 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-02-00006-425 | txEVBMMC-246-0-02-00006-425 | txEVIPEC-246-0-02-00006-425 | txEVIPMC-246-0-02-00006-425 | txEDEC-246-0-02-00006-425 | txEDMC-246-0-02-00006-425 | txPROV-246-0-02-00006-425 | 190FernBlu | txALTPCT-246-0-425 |
| 3359 | 246 | WILLIAMSON | 0 425 | 3 | 3 | JAMES "JIM" WRIGHT | ES&S DS200 | 0 | 0 | 153 | 153 | 230 | 230 | 0 | txEVBMEC-246-0-03-00003-425 | txEVBMMC-246-0-03-00003-425 | txEVIPEC-246-0-03-00003-425 | txEVIPMC-246-0-03-00003-425 | txEDEC-246-0-03-00003-425 | txEDMC-246-0-03-00003-425 | txPROV-246-0-03-00003-425 | 190FernBlu | txALTPCT-246-0-425 |
| 3360 | 246 | WILLIAMSON | 0 425 | 3 | 6 | JAMES "JIM" WRIGHT | ES&S DS850 | 15 | 15 | 0 | 0 | 0 | 0 | 0 | txEVBMEC-246-0-03-00006-425 | txEVBMMC-246-0-03-00006-425 | txEVIPEC-246-0-03-00006-425 | txEVIPMC-246-0-03-00006-425 | txEDEC-246-0-03-00006-425 | txEDMC-246-0-03-00006-425 | txPROV-246-0-03-00006-425 | 190FernBlu | txALTPCT-246-0-425 |

From: [GeneralCounsel](#)
To: [REDACTED]; [REDACTED]
Cc: [GeneralCounsel](#); [Elections Internet](#)
Subject: RE: PIA REQUEST
Date: Tuesday, December 14, 2021 8:47:28 PM
Attachments: 12-14-21 Request for Clarification - Gallagher PIR 21-1130.pdf

Ms. Gallagher,

Your below email was forwarded to the General Counsel for response. Please see the attached letter in response to your November 29, 2021 request for information under Chapter 552 of the Texas Government Code.

Sincerely,

Adam Bitter

General Counsel

Office of the Texas Secretary of State

From: Ryan Gallagher <[REDACTED]>
Sent: Monday, November 29, 2021 7:52 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: PIA REQUEST

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Please provide all electronic and/or paper correspondence between ES&S and Keith Ingram from July 01, 2020-November 29, 2021.

Please provide any and all emails, phone, and/or written correspondence between Keith Ingram and Christopher Davis between the dates January 01.2020 -November 29, 2021.

Please provide any and all emails, phone calls, and/ or written notes or mailed correspondence between the Secretary of State, ES & S, and/or Election Assistance Commission between 01/01/2020 and 11/29/2021;

Please provide any and all emails to and/or from Brian Mechler between 01/01/2020 through 11/29/2021;

Please provide any and all emails to and/or from the following State employees: Brandon Hurly, Keith Ingram, Josa Esparza, with the keywords "problem," "electronic," "issue," "hash," "ES&S," "ballot," "vulnerability," and/or "vendor" between 01/01/2020 and 11/29/2021;

Please provide a copy of all complaints the Texas Secretary of State received filed by voters for the November 3rd Joint General Election, received by email, mail, or web form. Please provide copies of the complaints received between 01/01/2020 and 11/29/2020;

Please provide a copy of all names of public information act requestors between 11/2020 and 11/2021 for Election Records.

Please provide a copy of all records, emails, calls, or logs regarding electronic election system malfunction, or failure in November 03,2020 JOint General Election, including for the Early Voting in

Person Period beginning 10/13/2020, through 10/30/2020 and Election Day in Person
Please provide a copy of all money paid to voter registrars for registering and canceling voters for the 2020 Election Cycle and Year.

Please provide a copy of all logs of calls into SOS voter fraud hotline and helpline for the period of October 2020 through December 2020.

This information is for the public good and will improve voter confidence and system improvements.

Thank you for filling my request quickly.

All my best,

Lori Gallagher

5125290493

Sent from [Mail](#) for Windows

The State of Texas

Executive Division
Capitol Building, 1E.8
P.O. Box 12887
Austin, Texas 78711-2887



John B. Scott
Secretary of State

Phone: 512-463-5770
Fax: 512-475-2761
Dial 7-1-1 For Relay Services
www.sos.texas.gov

December 14, 2021

Lori Gallagher

Sent via Electronic Mail to: [REDACTED]; [REDACTED]

Re: Request for records, considered received: November 30, 2021 (SOS PIR No. 21-1130)

Dear Ms. Gallagher:

This letter responds to your request for information under the Public Information Act, Chapter 552 of the Texas Government Code (the "PIA"), which was sent to the Office of the Texas Secretary of State (the "Office") via email after business hours on November 29, 2021 and is considered received on November 30, 2021 (the "Request"). In the Request, you state:

- 1. Please provide all electronic and/or paper correspondence between ES&S and Keith Ingram [sic] from July 01, 2020-November 29, 2021.*
- 2. Please provide any and all emails, phone, and/or written correspondence between Keith Ingram [sic] and Christopher Davis between the dates January 01, 2020 -November 29, 2021.*
- 3. Please provide any and all emails, phone calls, and/ or written notes or mailed correspondence between the Secretary of State, ES & S [sic], and/or Election Assistance Commission between 01/01/2020 and 11/29/2021[.]*
- 4. Please provide any and all emails to and/or from Brian Mechler between 01/01/2020 through 11/29/2021[.]*
- 5. Please provide any and all emails to and/or from the following State employees: Brandon Hurly [sic], Keith Ingram [sic], Josa Esparza [sic], with the keywords "problem," "electronic," "issue," "hash," "ES&S," "ballot," "vulnerability," and/or "vendor" between 01/01/2020 and 11/29/2021[.]*
- 6. Please provide a copy of all complaints the Texas Secretary of State received filed by voters for the November 3rd Joint General Election, received by email, mail, or web form. Please provide copies of the complaints received between 01/01/2020 and 11/29/2020[.]*
- 7. Please provide a copy of all names of public information act requestors between 11/2020 and 11/2021 for Election Records.*

8. *Please provide a copy of all records, emails, calls, or logs regarding electronic election system malfunction, or failure in November 03,2020 Joint General Election, including for the Early Voting in Person Period beginning 10/13/2020, through 10/30/2020 and Election Day in Person[.]*
9. *Please provide a copy of all money paid to voter registrars for registering and canceling voters for the 2020 Election Cycle and Year.*
10. *Please provide a copy of all logs of calls into SOS voter fraud hotline and helpline for the period of October 2020 through December 2020.*

CLARIFICATION REQUEST/NOTICE OF APPLICATION OF SEC. 552.222

In order to fulfill your Request, we need clarification regarding the scope and type of records that you are seeking to obtain from the Secretary of State's office. Clarifying or narrowing the scope of your request may help avoid the production of, and potential charges for, responsive information that you are not interested in receiving. It also may allow us to produce responsive documents to you more quickly. Additionally, we may be able to avoid having to withhold certain information under the Public Information Act and seek a ruling from the Office of the Attorney General ("OAG") regarding the release of such records.

To that end, please clarify or narrow your inquiry by responding to the following items:

1. For Items 1, 2, 3, and 4 of the Request, are you seeking information limited to certain specific *topics*? If so, please provide additional details regarding those topics—including search terms for us to utilize—so that we can accurately identify and collect any responsive items.
2. In Item 3 of the Request, you state that you are seeking correspondence “between the Secretary of State, ES & S [sic], and/or Election Assistance Commission.” Is this portion of the Request limited to correspondence involving former Secretary of State Ruth Hughs and current Secretary of State John Scott, or are you also seeking communications sent by or to other staff in the Secretary of State's office? If the latter, please identify the employees (or categories of employees) covered by Item 3. Narrowing your inquiry to a subset of Secretary of State employees would reduce the total time that we would have to spend responding to this part of the Request.¹
3. Regarding Item 5 of the Request:
 - a. Are you seeking (1) emails that Elections Director Keith Ingram or Deputy Secretary of State Joe Esparza sent to or received from *external* sources (*i.e.*, individuals and entities outside the Secretary of State's office); (2) *internal* emails exchanged solely among Secretary of State employees; or (3) both?²
 - b. As your inquiry is currently written, any email sent or received by Mr. Ingram or Deputy Secretary Esparza over a nearly two-year period would be responsive if it contains one or more of the identified terms. Several of these terms—including

¹ We are amenable to working with you to determine an appropriate custodian set for the information you are seeking to obtain in Item 3 of the Request.

² Brandon Hurley is not an employee of the Secretary of State's office.

“problem,” “electronic,” “issue,” “ballot,” and “vendor”—are likely to yield a substantial number of communications, many of which you may have no interest in obtaining through your inquiry. Removing or clarifying certain specified terms (or narrowing the date range of responsive communications) would reduce the volume of records encompassed by Item 5 of the Request.

4. Please clarify what you mean by “all complaints the Texas Secretary of State received filed by voters” in Item 6 of the Request. Are you referring only to election complaints submitted to our Office in accordance with Section 31.006 of the Texas Election Code, or does your Request also encompass other types of correspondence sent to our Office? If the latter, please provide additional details about the information that you are requesting from our Office. In either event, please note that Section 31.006(b) of the Texas Election Code provides that election complaints submitted to our Office “are not considered public information until: (1) the secretary of state makes a determination that the information received does not warrant an investigation; or (2) if referred to the attorney general, the attorney general has completed the investigation or has made a determination that the information referred does not warrant an investigation.” The OAG’s Open Records Division has ruled that we can withhold election complaints and related documents from disclosure under the PIA for complaints that remain under review by our Office or the OAG. *See, e.g.*, OR2021-32413; OR2020-31924; OR2020-15011A; OR2019-32866; OR2019-13766.³
5. For Item 7 of the Request, please clarify what you mean by “public information act requestors . . . for Election Records.” Are you seeking a list of individuals who have submitted requests to our Office over the specified time period for *certain* types of information (such as requests for the statewide voter registration list pursuant to Section 18.066 of the Texas Election Code), or does this portion of your inquiry encompass *all* record requests to our Office involving election-related information?
6. As to Item 8 of your Request:
 - a. We need clarification regarding your request for documents pertaining to “electronic election system malfunction . . . or failure” in the November 2020 general election. Please provide additional details relating to the requested records—including search terms for us to utilize—so that we can appropriately determine whether we maintain any responsive information.
 - b. Are you seeking (1) communications that Secretary of State employees sent to or received from *external* sources (*i.e.*, individuals and entities outside the Secretary of State’s office); (2) *internal* communications exchanged solely among Secretary of State employees; or (3) both?
7. We need clarification regarding the information sought in Item 9 of the Request. Are you seeking records relating to Texas Election Code Chapter 19 funds issued to voter registrars? If so, please clarify the types of documents sought—for example, are you willing to narrow this part of your Request to summary spreadsheets and other financial reports that our Office maintains (or which we can generate, potentially at no cost to you)?

³ In your clarified request, you may wish to narrow your inquiry by allowing us to exclude any information that would not be considered subject to public disclosure under the PIA *without* the necessity of seeking a ruling from the Attorney General.

8. As to Item 10 of the Request: Our Office does not maintain a comprehensive log showing “all . . . calls into SOS voter fraud hotline and helpline for the period of October 2020 through December 2020.” We may be able to provide you with certain emails that describe or mention telephone calls or voicemails received by the Office’s Elections Division. However, we would need to utilize pre-determined search terms to compile such emails—and even then, the searches would not turn up materials relating to all calls made to the Elections Division over any particular period of time. Given these limitations, we ask you to clarify the scope of Item 10 of the Request.

Depending on your clarification, we may have to provide you a statement of estimated costs pursuant to Section 552.2615 of the Texas Government Code. Likewise, providing the requested information may require programming and/or manipulation of data and would be available only at a cost that covers such programming or manipulation. *See* Tex. Gov’t Code § 552.231. In addition, some responsive information may be exempted from public disclosure under the PIA. However, we cannot make any of these determinations until we receive a clarified request from you.

Under Section 552.222 of the PIA, if you do not respond in writing to this request for clarification within sixty-one days of this communication, your request for information is deemed by Texas law to be withdrawn. The Secretary of State is a strong supporter of open government, and this Office is ready and willing to respond to any and all public information requests. However, we must require that requests provide sufficient detail regarding the records being sought so that we may fulfill our duties under the PIA.

If you have any questions or need additional information, or if you would like to submit a clarified request, please contact our office at (512) 463-5770 or at the e-mail address listed below.

Sincerely,



Adam Bitter
General Counsel
Office of the Texas Secretary of State
generalcounsel@sos.texas.gov
AB/jw

From: [Ryan Gallagher](#)
To: [GeneralCounsel](#); [REDACTED]
Cc: [GeneralCounsel](#); [Elections Internet](#)
Subject: RE: PIA REQUEST
Date: Thursday, December 16, 2021 10:58:45 AM

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Working on getting this back to you.

Thank you,

All my best,

Lori G.

Sent from [Mail](#) for Windows

From: [GeneralCounsel](#)
Sent: Tuesday, December 14, 2021 8:46 PM
To: [REDACTED]; [REDACTED]
Cc: [GeneralCounsel](#); [Elections Internet](#)
Subject: RE: PIA REQUEST

Ms. Gallagher,

Your below email was forwarded to the General Counsel for response. Please see the attached letter, with enclosure, in response to your November 29, 2021 request for information under Chapter 552 of the Texas Government Code.

Sincerely,

Adam Bitter

General Counsel

Office of the Texas Secretary of State

From: Ryan Gallagher [REDACTED] >
Sent: Monday, November 29, 2021 7:31 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: PIA REQUEST

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The Texas Secretary of State has stated in the below notice, that all the information is available for public request and inspection.

I would like to request a copy of all election records for the 4 Counties listed below, as well all the same records for, Hays, Travis, and Williamson County. This is for the necessary and public good and will benefit voter confidence in our Constitutional Republic.

Since the work has already been completed for the below 4 Counties, and most of the records have already been requested in the other Counties, we expect a timely response and full electronic copy of our request. We can provide new thumbnail drives if necessary and helps.

Thank you,
Lori Gallagher
5125290493

We have a team of Citizen auditors ready to process election records.

Texas Secretary of State Full Forensic Audit of 2020 General Election

The Texas Secretary of State's office has announced a full forensic audit of the 2020 General Election in Dallas, Harris, Tarrant and Collin counties. The full forensic audit is being conducted in two phases, the first of which is already underway. The purpose of this audit is to ensure all Texas voters can have confidence in the elections systems in our state, and to address any outstanding issues county election officials may face that undermines the integrity of our elections. Please send the records for Dallas, Harris, Tarrant, and Collin Counties, with Williamson, Hays, and Travis included.

Phase 1: Testing Voting Machine Accuracy, Cybersecurity Assessments, and Identifying and Removing Ineligible Voters Who Cast Ballots in 2020 (Already Completed or Underway)

- Please provide a copy of all cybersecurity assessments and lists of ineligible voters who cast ballots in 2020.

After every single Texas election, counties are required to conduct a partial manual count of electronic voting system ballots within 72 hours of the polls closing to ensure the accuracy of the tabulation of electronic voting systems results (Sec.

127.201). Please provide results to partial manual count of electronic voting system ballots for Williamson, Dallas, Harris, Tarrant, Collin, Travis, and Hays Counties.

All counties are required to undergo an Election Security Assessment (ESA) of the county's election system (Sec. 279.003). All 254 counties have completed these assessments.

- Please provide ESA for all 254 Counties

Under both state and federal law, the Texas Secretary of State's office is empowered to maintain the accuracy of the statewide voter registration list to ensure that ineligible voters – including deceased individuals, individuals registered in multiple states or counties, and non-U.S. citizens – do not remain on the voter rolls (Secs. 18.061 – 18.0681). Dead voters were on our voter registration rolls in Williamson County for November 3, 2020 Joint General Election. Please provide list of all voters that had a change in voter information and filled out "Change of Voter Information Form" for 2020 Election year in Williamson, Dallas, Harris, Tarrant, Collin, Travis, and Hays Counties.

-

As part of the audit process, the office has received reports from the Electronic Registration Information Center (ERIC) regarding voters who may have voted twice in state and across state lines. Please provide reports from ERIC with list of voters that voted twice and those from across state lines.

We have also received a report of persons who may have been deceased when a vote was cast in their name. Please provide a copy of this report and any communications with key words "deceased" in the body.

Finally, we have identified potential non-U.S. citizen voters and have directed county voter registrars to take action to verify the eligibility of registered voters and cancel their registration if they do not present proof of eligibility. Please provide list of potential non-US citizen voters that have been identified in Texas and the list of canceled voter registrations.

Once that action has been taken, **our office evaluates the persons cancelled** and refers any instances of possible illegal voting to the Office of the Texas Attorney General for investigation (Sec. 31.006).

Phase 2: Comprehensive Election Records Examination (Spring 2022)

- As part of the Texas Secretary of State's duty to assist and advise all election authorities with regard to the application, operation, and interpretation of the Texas Election Code (Sec. 31.004) and to obtain and maintain uniformity in the application of the Code (Sec. 31.003), the office will conduct **a comprehensive election records examination** over the next several months to ensure election administration procedures were properly followed during the 2020 General Election.

- The records examined from each county will include – but are not limited to – the following types of documents:

Please provide a copy of the following documents and forms for Williamson, Hays, Travis, Harris, Tarrant, Dallas, and Collin Counties.

- o Logic & Accuracy Testing Records for Voting Machines, including:

- §

- o All test ballots voted

- §

- o Test Deck Records

- §

- o Testing Media

- o Early Voting and Election Day Materials, including:

- § List of registered voters used in the 2020 General Election

- § Daily Early Voting Rosters for in-person voting

- § Chain of Custody forms that document the seals on the ballot boxes

- § Chain of Custody delivery and pickup of equipment at voting sites

- § Statements of Residence

- § Reasonable Impediment Declarations

- § Limited Ballot Applications

- § Audit Logs from applicable Voting System Devices

- § List of Rejected Provisional Ballots and reason for rejection

- § Ballot and Seal Certificates

- § Hand Delivery of a Ballot by Mail Roster and Forms

- § Receipts of Sealed Early Voting Ballot Boxes

- o Signature Verification Committee Materials

- o Early Voting Ballot Board Materials, including:

- § Receipt of Sealed Early Voting Ballot Boxes

- § Poll List of Mail Voters

- § Notice of Rejected Carriers and reasons

- o Central Counting Station Plan

- o Training Materials

- County election officials must retain these records for 22 months under both federal law (52 USC 20701) and state law (Texas Election Code Sec. 66.058).

- **All of this information is available to the general public (Sec. 1.012).**

- After a thorough examination of the abovementioned records and materials in each county,

irregularities or deviations from election administration procedures that may have affected the accuracy of the electronic voting system ballot count could trigger a full manual recount of ballots in the affected precincts or polling locations, pursuant to the Secretary of State's authority to ensure the accuracy of the tabulation of electronic voting system results (Sec. 127.202).

Because this request is for the public good and citizens are interested in helping improve our election system, there should be minimal charge in this request. Electronic Copy is fine.

Thank you for your time and assistance.

All my best,

Lori Gallagher

5125290493

Sent from [Mail](#) for Windows

From: [Ryan Gallagher](#)
To: [GeneralCounsel](#); [REDACTED]
Cc: [GeneralCounsel](#); [Elections Internet](#)
Subject: RE: PIA REQUEST
Date: Thursday, December 16, 2021 10:59:11 AM

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Working on getting this better defined. Will resend by end of week.

Thank you,

Lori G.

Sent from [Mail](#) for Windows

From: [GeneralCounsel](#)
Sent: Tuesday, December 14, 2021 8:47 PM
To: [REDACTED]; [REDACTED]
Cc: [GeneralCounsel](#); [Elections Internet](#)
Subject: RE: PIA REQUEST

Ms. Gallagher,

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Sincerely,

Adam Bitter

General Counsel

Office of the Texas Secretary of State

From: Ryan Gallagher [REDACTED] >
Sent: Monday, November 29, 2021 7:52 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: PIA REQUEST

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This information is for the public good and will improve voter confidence and system improvements.

Thank you for filling my request quickly.

All my best,

Lori Gallagher

5125290493

Sent from [Mail](#) for Windows

From: [Texas Constitutionals, UA](#)
To: [GeneralCounsel](#)
Subject: Re: PIA REQUEST
Date: Wednesday, December 15, 2021 11:03:36 AM

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Thank you for your response.

I will get this clarified and specified per your request, and back to you as soon as possible.

Thank you for your time and assistance.

TEXAS CONSTITUTIONALISTS, UA

Lori Gallagher
512-529-0493

On Tue, Dec 14, 2021, 8:45 PM GeneralCounsel <GeneralCounsel@sos.texas.gov> wrote:

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Adam Bitter

General Counsel

Office of the Texas Secretary of State

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All counties are required to undergo an Election Security Assessment (ESA) of the county's election system (Sec. 279.003). All 254 counties have completed these assessments.

- Please provide ESA for all 254 Counties

Under both state and federal law, the Texas Secretary of State's office is empowered to maintain the accuracy of the statewide voter registration list to ensure that ineligible voters – including deceased individuals, individuals registered in multiple states or counties, and non-U.S. citizens – do not remain on the voter rolls (Secs. 18.061 – 18.0681). Dead voters were on our voter registration rolls in Williamson County for November 3, 2020 Joint General Election. Please provide list of all voters that had a change in voter information and filled out "Change of Voter Information Form" for 2020 Election year in Williamson, Dallas, Harris, Tarrant, Collin, Travis, and Hays Counties.

-

As part of the audit process, the office has received reports from the Electronic Registration Information Center (ERIC) regarding voters who may have voted twice in state and across state lines. Please provide reports from ERIC with list of voters that voted twice and those from across state lines.

We have also received a report of persons who may have been deceased when a vote was cast in their name. Please provide a copy of this report and any communications with key words "deceased" in the body.

Finally, we have identified potential non-U.S. citizen voters and have directed county voter registrars to take action to verify the eligibility of registered voters and cancel their registration if they do not present proof of eligibility. Please provide list of potential non-US citizen voters that have been identified in Texas and the list of canceled voter registrations.

Once that action has been taken, our office evaluates the persons cancelled and refers any instances of possible illegal voting to the Office of the Texas Attorney General for investigation (Sec. 31.006).

Phase 2: Comprehensive Election Records Examination (Spring 2022)

- As part of the Texas Secretary of State's duty to assist and advise all election authorities with regard to the application, operation, and interpretation of the Texas Election Code (Sec. 31.004) and to obtain and maintain uniformity in the application of the Code (Sec. 31.003), the office will conduct a comprehensive election records examination over the next several months to ensure election

administration procedures were properly followed during the 2020 General Election.

- The records examined from each county will include – but are not limited to – the following types of documents:

Please provide a copy of the following documents and forms for Williamson, Hays, Travis, Harris,

Tarrant, Dallas, and Collin Counties.

o Logic & Accuracy Testing Records for Voting Machines, including:

§

All test ballots voted

§

Test Deck Records

§

Testing Media

o Early Voting and Election Day Materials, including:

§ List of registered voters used in the 2020 General Election

§ Daily Early Voting Rosters for in-person voting

§ Chain of Custody forms that document the seals on the ballot boxes

§ Chain of Custody delivery and pickup of equipment at voting sites

§ Statements of Residence

§ Reasonable Impediment Declarations

§ Limited Ballot Applications

§ Audit Logs from applicable Voting System Devices

§ List of Rejected Provisional Ballots and reason for rejection

§ Ballot and Seal Certificates

§ Hand Delivery of a Ballot by Mail Roster and Forms

§ Receipts of Sealed Early Voting Ballot Boxes

o Signature Verification Committee Materials

o Early Voting Ballot Board Materials, including:

§ Receipt of Sealed Early Voting Ballot Boxes

§ Poll List of Mail Voters

§ Notice of Rejected Carriers and reasons

o Central Counting Station Plan

o Training Materials

- County election officials must retain these records for 22 months under both federal law (52 USC 20701) and state law (Texas Election Code Sec. 66.058).

- All of this information is available to the general public (Sec. 1.012).

- After a thorough examination of the abovementioned records and materials in each county, irregularities or deviations from election administration procedures that may have affected the accuracy of the electronic voting system ballot count could trigger a full manual recount of ballots in the affected precincts or polling locations, pursuant to the Secretary of State's authority to ensure the accuracy of the tabulation of electronic voting system results (Sec. 127.202).

Because this request is for the public good and citizens are interested in helping improve our election system, there should be minimal charge in this request. Electronic Copy is fine.

Thank you for your time and assistance.

All my best,

Lori Gallagher

5125290493

Sent from [Mail](#) for Windows

From: [Texas Constitutionals, UA](#)
To: [GeneralCounsel](#)
Subject: Re: PIA REQUEST
Date: Wednesday, December 15, 2021 11:04:51 AM

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Thank you for your response.

I will get this clarified and specified per your request, and back to you as soon as possible.

Thank you for your time and assistance.

TEXAS CONSTITUTIONALISTS, UA

Lori Gallagher
512-529-0493

On Tue, Dec 14, 2021, 8:47 PM GeneralCounsel <GeneralCounsel@sos.texas.gov> wrote:

Ms. Gallagher,

Your below email was forwarded to the General Counsel for response. Please see the attached letter in response to your November 29, 2021 request for information under Chapter 552 of the Texas Government Code.

Sincerely,

Adam Bitter

General Counsel

Office of the Texas Secretary of State

From: Ryan Gallagher [REDACTED]
Sent: Monday, November 29, 2021 7:52 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: PIA REQUEST

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attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

Please provide all electronic and/or paper correspondence between ES&S and Keith Ingram from July 01, 2020-November 29, 2021.

Please provide any and all emails, phone, and/or written correspondence between Keith Ingram and Christopher Davis between the dates January 01.2020 -November 29, 2021.

Please provide any and all emails, phone calls, and/ or written notes or mailed correspondence between the Secretary of State, ES & S, and/or Election Assistance Commission between 01/01/2020 and 11/29/2021;

Please provide any and all emails to and/or from Brian Mechler between 01/01/2020 through 11/29/2021;

Please provide any and all emails to and/or from the following State employees: Brandon Hurly, Keith Ingram, Josa Esparza, with the keywords "problem," "electronic," "issue," "hash," "ES&S," "ballot," "vulnerability," and/or "vendor" between 01/01/2020 and 11/29/2021;

Please provide a copy of all complaints the Texas Secretary of State received filed by voters for the November 3rd Joint General Election, received by email, mail, or web form. Please provide copies of the complaints received between 01/01/2020 and 11/29/2020;

Please provide a copy of all names of public information act requestors between 11/2020 and 11/2021 for Election Records.

Please provide a copy of all records, emails, calls, or logs regarding electronic election system malfunction, or failure in November 03,2020 JOint General Election, including for the Early Voting in Person Period beginning 10/13/2020, through 10/30/2020 and Election Day in Person

Please provide a copy of all money paid to voter registrars for registering and canceling voters for the 2020 Election Cycle and Year.

Please provide a copy of all logs of calls into SOS voter fraud hotline and helpline for the period of October 2020 through December 2020.

This information is for the public good and will improve voter confidence and system improvements.

Thank you for filling my request quickly.

All my best,

Lori Gallagher

5125290493

Sent from [Mail](#) for Windows

From: [Ryan Gallagher](#)
To: [GeneralCounsel](#); [REDACTED]
Subject: RE: PIA REQUEST
Date: Thursday, December 16, 2021 11:06:06 AM
Attachments: piacohn.pdf
piacohn2.pdf
piacohn3.pdf

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Here are some of the emails that we have but have not received the rest of them. We have uncertified results here in Williamson County and we have our representatives, in part, being chosen off those uncertified results and contested census records. We have thousands of voters in Central Texas that have lost all confidence in our failed election system. I am the Director of Texas Constitutionalists, with thousands in our grassroots networks.

I was appointed a poll watcher for the Republican Party of Williamson County for the reconvening of Central Counting Station and denied entry on 11/12/2020. I took that appointment very seriously and know our duty is to make sure this never happens again. This was a once in a decade election and no one is being held up to the same standard of law that we the people are held up to.

I will send the requested clarification by end of week.

Thank you very much,

Lori Gallagher

Sent from [Mail](#) for Windows

From: [GeneralCounsel](#)

Sent: Wednesday, December 1, 2021 3:47 PM

To: [REDACTED]; [REDACTED]

Subject: RE: PIA REQUEST

Thank you for contacting the Office of the Texas Secretary of State. Your email was forwarded to the General Counsel for response. This email acknowledges receipt of your request for information under the Public Information Act, and we will process it in accordance with Chapter 552 of the Texas Government Code.

We will let you know if we have any questions or need clarification.

Regards,

Office of the Texas Secretary of State

From: Ryan Gallagher <[REDACTED]>
Sent: Monday, November 29, 2021 7:52 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: PIA REQUEST

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Please provide any and all emails to and/or from the following State employees: Brandon Hurly, Keith Ingram, Josa Esparza, with the keywords "problem," "electronic," "issue," "hash," "ES&S," "ballot," "vulnerability," and/or "vendor" between 01/01/2020 and 11/29/2021;

Please provide a copy of all complaints the Texas Secretary of State received filed by voters for the November 3rd Joint General Election, received by email, mail, or web form. Please provide copies of the complaints received between 01/01/2020 and 11/29/2020;

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This information is for the public good and will improve voter confidence and system improvements.

Thank you for filling my request quickly.

All my best,

Lori Gallagher

5125290493

Sent from [Mail](#) for Windows

From: Keith Ingram
To: Christina Adkins; Charles Pinney
Cc: Adam Ritter
Subject: FW: Notification to States- ES&S- Lab report
Date: Thursday, October 15, 2020 11:49:21 AM
Attachments: ES&S FCO 1100 - SLI Analysis.zip
ES&S FCO 1100 - Pro V&V Analysis.zip

From: Mona Harrington <mharrington@eac.gov>
Sent: Thursday, October 15, 2020 11:35 AM

To: [REDACTED]; kea.warne@state.sd.us; linda.lamone@maryland.gov; meagan.wolfe@wisconsin.gov; ssandvoss@elections.il.gov; kai.schon@wyo.gov; chris.piper@elections.virginia.gov; bking@iec.in.gov; bdul@azsos.gov; braterj@michigan.gov; Keith Ingram <KIngram@sos.texas.gov>; Anthony.Albence@delaware.gov; Apmiller@dcboe.org; mark.goins@tn.gov; 'Michael' <micmoser@pa.gov>; agrandjean@ohiosecretaryofstate.gov; jared.dearing@ky.gov; bryan.caskey@sos.ks.gov; wthorley@sos.nv.gov; 'Lori Augino' <lori.augino@sos.wa.gov>; Maria.Matthews@DOS.myflorida.com; kendra.lane@sos.mo.gov; clay.helms@sos.alabama.gov; heidi.burhans@sos.iowa.gov; hawley.robertson@sos.ms.gov; leslie.bellamy@sos.arkansas.gov; jason.hancock@sos.idaho.gov; [REDACTED]
Cc: Kevin Rayburn <KRayburn@eac.gov>; Jerome Lovato <jlovato@eac.gov>

Subject: RE: Notification to States- ES&S- Lab report

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Good afternoon everyone,
I hope this email finds you all well. As promised attached are the final lab reports.
Best,
Mona

From: Mona Harrington <mharrington@eac.gov>
Sent: Wednesday, October 14, 2020 2:55 PM

To: [REDACTED]; kea.warne@state.sd.us; linda.lamone@maryland.gov; meagan.wolfe@wisconsin.gov; ssandvoss@elections.il.gov; kai.schon@wyo.gov; chris.piper@elections.virginia.gov; bking@iec.in.gov; bdul@azsos.gov; braterj@michigan.gov; kingram@sos.texas.gov; Anthony.Albence@delaware.gov; Apmiller@dcboe.org; mark.goins@tn.gov; 'Michael' <micmoser@pa.gov>; agrandjean@ohiosecretaryofstate.gov; jared.dearing@ky.gov; bryan.caskey@sos.ks.gov; wthorley@sos.nv.gov; 'Lori Augino' <lori.augino@sos.wa.gov>; Maria.Matthews@DOS.myflorida.com; kendra.lane@sos.mo.gov; clay.helms@sos.alabama.gov; heidi.burhans@sos.iowa.gov; hawley.robertson@sos.ms.gov; leslie.bellamy@sos.arkansas.gov; jason.hancock@sos.idaho.gov; [REDACTED]
Cc: Kevin Rayburn <KRayburn@eac.gov>; Jerome Lovato <jlovato@eac.gov>

Subject: Re: Notification to States- ES&S- Lab report

Hi Amy, We concurred with their findings that supported approving the requested de minimus change. That means we are not challenging their findings and are satisfied with the work performed. I will be sending the reports, nothing beyond that. I hope that helps.
Get Outlook for iOS

From: Christina Adkins
To: Brian Mechler
Cc: [REDACTED]; [REDACTED]; Lesley.French@oag.texas.gov;
Austin.Kinghorn@oag.texas.gov; Charles Pinney
Subject: Re: EVS 6030
Date: Thursday, November 19, 2020 12:45:46 PM
Attachments: image001.png

My understanding is that they are seeking it for all affected versions. I think it just needs to work it's way through the process administratively. I can reach out to the EAC to confirm.

And before you ask, we have a meeting with ESS in December to discuss the scope of this issue as it appears to have affected more systems than they initially disclosed to us.

From: Brian Mechler [REDACTED] >
Sent: Thursday, November 19, 2020 12:32:37 PM
To: Christina Adkins <CAdkins@sos.texas.gov>
Cc: [REDACTED]; [REDACTED];
[REDACTED] >; [REDACTED] >;
Lesley.French@oag.texas.gov <Lesley.French@oag.texas.gov>; [REDACTED];
[REDACTED]; Austin.Kinghorn@oag.texas.gov <Austin.Kinghorn@oag.texas.gov>;
Charles Pinney <CPinney@sos.texas.gov>
Subject: Re: EVS 6030

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Just in case anyone was worried or curious, the SYSLOAD.BMP file that failed the EVS 6.0.3.0 hash verification process does match with one of the previous FW versions, 1.4.1.2

I can't find anything on the ECO on the EAC website yet. The Pro V&V report lists a whole slew of affected versions, but the SLI report only identifies 6.0.3.0 as affected. Do we know for which versions ES&S is seeking EAC approval of the ECO?

Brian

On Wed, Nov 18, 2020 at 11:15 AM Christina Adkins <CAdkins@sos.texas.gov> wrote:

Dear Examiners:

191/209

To: Charles Pinney <CPinney@sos.texas.gov>

Cc: [REDACTED]; [REDACTED]; French, Lesley <Lesley.French@oag.texas.gov>; Cheryl Sneeringer [REDACTED]; austin.kinghorn@oag.texas.gov <austin.kinghorn@oag.texas.gov>; Christina Adkins <CAdkins@sos.texas.gov>

Subject: Re: Vendor Responses to Examiner Questions - EVS 6030 and 6110

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Hi Chuck,

I would like ES&S provide some more background on the stick vs iono install hash discrepancy. In which document(s) does the VSTL acknowledge and accept the discrepancy? What documentation has been provided to customers related to the issue? Given that BMP files can be used to exploit systems [1], what applications read SYSLOAD.BMP and do those applications perform any actions to prevent an attack from a malicious BMP file?

[1] https://apps.nsa.gov/iaarchive/library/reports/bmp_inspection_and_sanitization_guidance_v1_0-20171212.cfm

Thanks,
Brian

On Mon, Aug 24, 2020 at 3:08 PM Charles Pinney <CPinney@sos.texas.gov> wrote:

Hey everyone,

Susan just got back to me with her responses to your first round of questions:

With regard to Jim's question on whether or not the database formats (a.k.a. schemas) are identical for the EVS 6.0.3.0, EVS 6.1.1.0, and their immediate predecessors please forward the following response:

Schemas between EVS 6030 and EVS 6110, are not identical given the audio prompts are different as well as the fact that EVS 6030 is on a Windows 7 OS whereas EVS 6110 is on a Windows 10 OS. Although a change in operating system doesn't necessarily have much to do with the schemas, the general development between the versions on the different operating systems would cause the schemas of those two versions to change regularly.

However, EVS 6020 to EVS 6030 are identical and EVS 6100 to EVS 6110 are identical. We didn't update the audio prompts or change the databases version # between either of these releases. That's how or why we can use an EVS 6020 backup election and restore it into EVS 6030 and we can use an EVS 6100 backup election and restore it into EVS 6110.

I also wanted to give you a little additional information to provide to Brian when you send him the hash verifications I provided on Friday. As I mentioned all hashes pulled from the hardware matched the trusted hashes and when Brian runs his own comparison, all will match exactly with the exception of one.

134/209

The hash pulled from the EVS 6030 ExpressVote 1.0 pulls a SYSLOAD.BMP file (which is the bitmap that displays the copyright year and was NOT a standard file included in the updates of the earlier ExpressVote versions.) This was addressed in later versions but not in the earlier EVS 6020 version, so even when the VSTL tested and pulled the hash, they received the same mis-match on verification. The SYSLOAD.BMP file that is pulled is as follows:

SYSLOAD.BMP

No Match Found

File: SHA256(/part1/SYSLOAD.BMP)

Hash: b3a230dc5ff31311a9f83b5bfee22ac96291c57f0c84abd05852aabf605ebbe3

Static file – when the ExpressVote 1.0 units are updated with the update stick, the above file mismatch will always occur. If a Full inno install is done, it will have the SYSLOAD.BMP file and the verification will match. As you know, we did the stick update at the event and not a full inno install. The VSTL noted this in EVS 6020 and EVS 6030 while running the Verifications during the testing phase on the ExpressVote 1.0 and considers it a match if this is the only file that comes up as a mismatch during verification.

Let me know if you all have any follow-up questions or anything else you need from me.

Thanks,

Chuck Pinney

Attorney -- Elections Division

Office of the Texas Secretary of State

1019 Brazos Street | Rudder Building, 2nd Floor | Austin, Texas 78701

1.800.252.VOTE (8683)

elections@sos.texas.gov | www.sos.texas.gov/elections



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as a legal opinion for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

--
Tom Watson
20203 Hunters Point Drive
Georgetown, TX 78633

512.818.1292

135/209