



July 1 2024

VIA EMAIL

Office of the Ohio Secretary of State
22 North Fourth Street, 16th Floor
Columbus, OH 43215
SWarren@OhioSOS.Gov

Re: Public Records Act Request

Dear Public Records Officer:

Pursuant to the Ohio Public Records Act (PRA), Ohio Rev. Code § 149.43, and other applicable Ohio law, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office promptly produce the following records:

1. Any directives/advisories (CBE-45), including informal guidance/directives/advisories, issued to county boards of elections regarding the removal of non-citizen voter registrations from the voter rolls.
2. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) any of the Ohio Secretary of State officials listed below, and (b) any of the external individuals listed below (including individuals communicating from the listed email addresses or domains¹), and (c) containing any of the key terms listed below.

Ohio Secretary of State Officials:

- i. Frank LaRose, Secretary of State
- ii. Jason Mauk, Chief of Staff
- iii. Amanda Grandjean, Former Director of Elections
- iv. Matthew Tlachac, Interim Director of Elections
- v. Brian Katz, Director of Public Integrity
- vi. Anyone serving as the Elections Director from January 1, 2024, through the date your office receives this request.

¹ To the extent your office does not have the capability to search for external correspondents by domain name, American Oversight requests that your office use the listed institution's name as a search term or phrase.



- vii. Anyone serving as Director of the Office of Data Analytics and Archives from January 1, 2024, through the date your office receives this request.

External Entities and Individuals:

- a. Andrew “Andy” Roth
- b. Cleta Mitchell (cleta@cletamitchell.com)
- c. Check My Vote (checkmyvote.org)
- d. Christie Moore
- e. Dan LaChance
- f. Election Fairness Institute (electionfairnessinstitute.org)
- g. Federation for American Immigration Reform (FAIR) (fairus.org)
- h. Fair Election Fund (thefairelectionfund.com)
- i. Harry Haury
- j. Honest Elections Project (honestelections.org)
- k. Immigration Accountability Project (iaproject.org)
- l. Jay DeLancy (jay@voterintegrityproject.com)
- m. Jenny Beth Martin
- n. Kate Sullivan (citizenvoter2024@gmail.com)
- o. Ken Cuccinelli (ktc21968@gmail.com)
- p. Marly Hornik
- q. New York Citizens Audit (NYCA.info@proton.me, auditny.com)
- r. Numbers USA (numbersusa.com)
- s. Ohio Election Integrity Network (ohioein.org)
- t. Only Citizens Vote Coalition (onlycitizensvotecoalition.com)
- u. Public Interest Legal Foundation (publicinterestlegal.org)
- v. Representative Jim Jordan, and/or anyone communicating on his behalf
- w. Rosemary Jenks
- x. State Freedom Caucus Network (statefreedomcaucus.org)
- y. Stephen Miller
- z. Thomas Wood (thomas.wood@usa4freedom.org)
- aa. Tea Party Patriots (teapartypatriots.org)
- bb. United Sovereign Americans (unite4freedom.com, usa4freedom.com)

Key Terms:

- a. “non citizen”
- b. non-citizen
- c. noncitizen
- d. “non-U.S.”
- e. “citizenship review”
- f. citizens-only
- g. “citizens only”
- h. “SAVE act”
- i. “SAVE federal”
- j. “Systematic Alien Verification for Entitlements”
- k. “Safeguard American Voter Eligibility”
- l. “illegal alien”

- m. “illegal immigrant”
- n. “illegal migrant”

For both parts of this request, please provide all responsive records from January 1, 2024, through the date your office receives this request.

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics.
- In conducting your search, please understand the terms “record,” “document,” and “information” in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind.
- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages.
- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.² If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
- Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight. American Oversight welcomes an opportunity to

² Ohio Rev. Code § 149.43(B)(1).

discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

Conclusion

American Oversight is a 501(c)(3) nonprofit with the mission to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and X (formerly Twitter).³

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Ben Sparks at records@americanoversight.org or 202.873.1741.

Sincerely,

/s/ Ben Sparks

Ben Sparks
on behalf of
American Oversight

³ American Oversight currently has approximately 16,000 followers on Facebook and 111,500 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited June 20, 2024); American Oversight (@weareoversight), X (formerly Twitter), <https://twitter.com/weareoversight> (last visited June 20, 2024).