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CLIENT/MATTER NUMBER
999100-0100

November 17, 2020

openrecords@sos.ga.gov; rgermany@sos.ga.gov

Georgia Department of State
Elections Division
2 Martin Luther King Jr. Drive
Suite 802, Floyd West Tower
Atlanta, GA 30334
Attn: Public Records Officer

Re: Open Records Act Request

Dear Sir or Madam:

Under Georgia's Open Records Act, Ga. Code. Ann. § 50-18-71 et seq., and the Code of Georgia Annotated Title 21 governing Elections, on behalf of Tea Party Patriots Action and Jenny Beth Martin, a Georgia resident and taxpayer, I request the following information and data:

- 1. Any and all directives, communications, instructions, and/or training materials provided to the county election officials at any time related to the "audit...recount..and .. recanvass all at once" involving the 2020 Presidential election in Georgia ("the Hand Count") announced by your office on Wednesday, November 10, 2020.
2. Specifically, we request all information related to your instructions regarding which totals were /are to be treated as the official results for certification purposes: the tallies of ballots from the Handcount or the original ballot totals from November 3, 2020.
3. All internal communications in your office related to the directive(s), decision(s), and determination(s) of which vote totals to treat as the official results of the 2020 General Election in Georgia for the Presidential election.
4. Materials furnished to election superintendents, poll officers, and poll clerks for use in the Handcount.

We request that these documents be produced immediately and prior to the certification by your office of the statewide election results in the 2020 Presidential race. If any or all of these documents are available online, please advise immediately.

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If documents, information, or data can be emailed, you may email them to me at this address: cmitchell@foley.com. If information is available for pickup at your office, please notify me and we will make arrangements to retrieve the documents responsive to this request.

If you anticipate being unable to comply with any part of this request immediately, please so advise. If you are unwilling or unable to comply within three days pursuant to Ga. Code. Ann. § 50-18-71(b)(1)(A), please also contact me immediately.

In the event that you cannot fulfill this request in total, please do let me know if you are able to partially fulfill this request. Please inform me of any charges associated with this request (if you expect the charges to exceed \$200.00, please contact me prior to incurring any charges), and the preferred method of payment.

If you have any questions or concerns, please contact me at 202-295-4081. Thank you for your immediate attention.

Sincerely,

/s/ Cleta Mitchell

Cleta Mitchell, Esq.,
Counsel to
Tea Party Patriots Action