

November 19, 2020

**BY EMAIL:** [openrecords@sos.ga.gov](mailto:openrecords@sos.ga.gov)

Open Records Officer  
Office of Brad Raffensperger  
214 State Capitol  
Atlanta, Georgia 30334

Re: Request for Records Under the Georgia Open Records Law, § 50.18.70 et seq.

Dear Open Records Officer:

Citizens for Responsibility and Ethics in Washington (“CREW”) makes this request for records pursuant to the Georgia Open Records Law, § 50.18.70 et seq.

Specifically, CREW requests:

1. All communications between the Office of Secretary of State Brad Raffensperger and Senator Lindsey Graham from November 3, 2020 to the day this request is processed.
2. All Communications among the Office of Secretary of State Brad Raffensperger’s staff mentioning Senator Lindsey Graham from November 3, 2020 to the day this request is processed, excluding communications that contain mere press clippings or news articles mentioning Senator Graham with no accompanying discussion by government officials.

CREW requests records of any kind as defined by the public records law, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. If it is your position any portion of the requested records is exempt from disclosure, O.C.G.A. § 50-28-71 (d) requires you to state the basis of the exemption you contend is applicable. Our request includes but is not limited to paper documents and electronic records, including emails and their attachments.

On November 17 Georgia Secretary of State Brad Raffensperger told the Washington Post that during a phone conversation with Senator Lindsey Graham the previous Friday, the Senator pressured him to throw out legally cast ballots. In their conversation Graham asked about Georgia’s signature-matching law and whether political bias could influence some election workers to accept votes with non-matching signatures. Graham additionally asked if Raffensperger could throw out ballots in counties with higher rates of non-matching signatures<sup>1</sup>.

---

<sup>1</sup> Amy Gardner, Ga. secretary of state says fellow Republicans are pressuring him to find ways to exclude ballots, *Washington Post*, Nov. 16, 2020, available at [https://www.washingtonpost.com/politics/brad-raffensperger-georgia-vote/2020/11/16/6b6cb2f4-283e-11eb-8fa2-06e7cbb145c0\\_story.html](https://www.washingtonpost.com/politics/brad-raffensperger-georgia-vote/2020/11/16/6b6cb2f4-283e-11eb-8fa2-06e7cbb145c0_story.html)

Since Joe Biden was announced as the winner of the 2020 Presidential election Trump has continuously challenged the validity of the results in several battleground states, including Georgia.<sup>2</sup> As a close ally of President Trump, Graham has interest in Trump winning the election. The public has a compelling interest in knowing if a United States Senator endangered the integrity of the 2020 election and undermined faith in democracy by pressuring a public official to tamper with the results of the Presidential election.

CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the public's right to be aware of the activities of government officials, to ensuring the integrity of those officials, and to highlighting and reducing the influence of money on politics. CREW intends to analyze the information responsive to this request and to share its analysis with the public. The release of information obtained through this request is not in CREW's financial interest.

If there are any fees for searching or copying these records, please inform CREW if the cost will exceed \$100. However, CREW also requests a waiver of all fees because the disclosure of the requested information is in the public interest. The public is entitled to information concerning Secretary of State Brad Raffensperger's phone call with Senator Lindsey Graham. Further, this information is not being sought for commercial purposes. Please advise us if the costs associated with processing this request will exceed \$100.00.

If you have any questions about this request or foresee any problems in fully releasing the requested records, please contact me at [rjacobs@citizensforethics.org](mailto:rjacobs@citizensforethics.org). Where possible, please produce records in electronic format. Please send the requested records to me in electronic form at [rjacobs@citizensforethics.org](mailto:rjacobs@citizensforethics.org). If it's not possible to produce them electronically, please contact me at that email, and I will provide a mailing address. Thank you for your assistance.

Sincerely,



Rebecca Jacobs  
Research Associate

---

<sup>2</sup> Donald Trump, (@RealDonaldTrump), *Twitter*, Nov. 13, 2020, available at <https://twitter.com/realDonaldTrump/status/1327413534901350400>