

July 16, 2021

Annette Dunn, Chief Information Officer Iowa Legislature 200 E. Grand Avenue Des Moines, Iowa 50309 Annette.dunn@iowa.gov

Dear Ms. Dunn,

Citizens for Responsibility and Ethics in Washington ("CREW") makes this request for records of the Iowa Legislature pursuant to the Iowa Public Records Law, Iowa Code, Chapter 22.

Specifically, CREW requests the following records relating to Senate File 413 ("SF 413") created on or before March 8, 2021:

- 1. All records discussing the potential effect of any provision of SF 413 on Black voters, Latino voters, other racial or ethnic minority voters, elderly voters, or voters with disabilities, including without limitation the following provisions of SF 413:
  - i. Voter Registration Restrictions (SF 413 Section 22)
  - ii. Vote-by-Mail Restrictions (SF 413 Sections 1, 43, 45, 47, 52, 54, and 66)
  - iii. Drop Box Restrictions (SF 413 Sections 50, 51, and 53)
  - iv. Election Day Changes (SF 413 Sections 36 and 41)
  - v. Voter Assistance Restrictions (SF 413 Section 65)
- 2. All records reflecting any analysis, consideration, or determination regarding how SF 413 would serve to prevent purported voter fraud or irregularities, including any evidence or data supporting such analyses.
- 3. All records relating to the legislative procedures by which SF 413 was passed, including without limitation records relating to:
  - i. Requirements or limitations regarding testimony from members of the public on the bill
  - ii. Requirements or limitations regarding legislative debate on the bill
  - iii. Efforts to expedite the legislative process for the bill
- 4. All records reflecting any communications, meetings, phone calls, or conversations regarding SF 413 or any predecessor version of that bill with representatives of any non-governmental or private organization, including without limitation the following organizations and individuals:

- i. Heritage Action for America
- ii. Heritage Foundation
- iii. Susan B. Anthony List
- iv. American Principles Project
- v. Tea Party Patriots
- vi. FreedomWorks
- vii. American Legislative Exchange Council (ALEC)
- viii. Family Research Council
- ix. Honest Elections Project
- x. State Policy Network
- xi. Alliance Defending Freedom
- xii. Federalist Society
- xiii. Cleta Mitchell
- xiv. Ken Cuccinelli

Please search for responsive records in the offices of the following legislators:

- Senator Jake Chapman
- · Senator Roby Smith
- Senator Chris Cournoyer
- Senator Waylon Brown
- Senator Dan Dawson
- Senator Tim Goodwin
- Senator Dennis Guth
- Senator Craig Johnson
- Senator Carrie Koelker
- Senator Jeff Reichman
- Senator Jason Schultz
- Representative Pat Grassley
- Representative Bobby Kaufmann
- Representative Brooke Boden
- Representative Robert P. Bacon
- Representative Jane Bloomingdale
- Representative Jacob Bossman
- Representative Jon Jacobsen
- Representative Megan Jones
- Representative Shannon Lundgren
- Representative Ann Meyer
- Representative Joe Mitchell
- Representative Thomas Jay Moore
- Representative Carter F. Nordman
- Representative Mike Sexton
- Representative Brent Siegrist

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages,

facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, as well as emails to which the subjects of this request were cc'ed or bcc'ed.

If it is your position that any portion of the requested records is exempt from disclosure, please state the basis of the exemption you contend is applicable. Iowa Public Records Law, Iowa Code, Chapter 22.4. Please also state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential (Chapter 22. 2, 22.7, and 22.8). If some portions of the requested records are properly exempt from disclosure, please redact those portions and produce the remainder of the requested records.

Because disclosure of the requested records is in the public interest and CREW seeks the records for a noncommercial purpose, CREW respectfully requests that the custodian not charge fees for processing. *See* Iowa Code, Chapter 22.3(2) (providing that a fee "may" be charged). However, CREW agrees to pay up to \$100 for copies of the requested records. If fees are expected to exceed this amount, please contact me at nsus@citizensforethics.org.

Where possible, please produce records in electronic format. Please send the requested records to me at either <a href="mailto:nsus@citizensforethics.org">nsus@citizensforethics.org</a> or Citizens for Responsibility and Ethics in Washington, 1331 F St. NW, Suite 900, Washington, D.C. 20004.

Please contact me if you have any questions about this request or foresee any problems in fully releasing the requested records.

Thank you for your assistance.

Sincerely,

Nikhel Sus Senior Counsel

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