Citizens for Responsibility and Ethics in Washington (“CREW”) makes this request for
records from the Montana House of Representatives pursuant to Article II, Section 9, of the
seq.

Specifically, CREW requests the following records relating to House Bill 176 (“HB 176”)
created on or before April 9, 2021:

1. All records discussing the potential effect of any provision of HB 176 on Black
   voters, Latino voters, Native American voters, other racial or ethnic minority
   voters, elderly voters, or voters with disabilities, including without limitation
   the following provisions of HB 176:
      i. Elimination of same day registration on Election Day (HB 176 Section 2)
      ii. Requirement that voters who register during the “late registration”
          period must cast their ballot at the office of an election administrator
          (HB 176 Section 4)

2. All records reflecting any analysis, consideration, or determination regarding
   how HB 176 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 HB 176 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 relating to the decision to make the bill effective “on passage and
   approval.” (HB 176 Section 6).

5. All records reflecting any communications, meetings, phone calls, or
   conversations regarding HB 176 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 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. If some portions of the requested records are properly exempt from disclosure, please redact those portions and produce the remainder of the requested records.

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. Further, this information is not being sought for commercial purposes.

If there are any fees for searching or copying these records, CREW agrees to pay up to $100. If copying fees are expected to exceed $100, or if you anticipate that “extensive use” of information technology resources or extensive clerical or supervisory assistance will be needed to fulfill this request, please contact me at (202) 408-5565 or liheanachor@citizensforethics.org.
Where possible, please produce records in electronic format. Please send the requested records to me at either liheanachor@citizensforethics.org or Laura Iheanachor, 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,

Laura Iheanachor
Staff Counsel