



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

April 25, 2023

BY EMAIL: PublicRecords@DOS.MyFlorida.com; DOS.GeneralCounsel@DOS.MyFlorida.com

Florida Department of State
Office of the General Counsel
Attn: Public Records Custodian
500 South Bronough Street, Suite 100
Tallahassee, Florida 32399-0250

Dear Public Information Officer:

Citizens for Responsibility and Ethics in Washington (“CREW”) makes this request for records pursuant to the Public Records Act, Chapter 119 of the Florida Statutes.

First, CREW requests copies of any communications, dated January 1, 2023 through March 31, 2023 pertaining to or mentioning (1) the Electronic Registration Information Center (ERIC) or (2) David Becker, former board member of ERIC, between the Office of the Secretary of State and any of the following individuals:

- Chrissy Peters, Missouri Senior Director of Elections;
- John (Jay) Ashcroft, Missouri Secretary of State;
- Brittany Westfall, West Virginia Director of Elections;
- Mac Warner, West Virginia Secretary of State;
- R. Kyle Ardoin, Louisiana Secretary of State;
- Sherri Wharton Hadskey, Louisiana Commissioner of Elections;
- Wes Allen, Alabama Secretary of State;
- Jeff Elrod, Alabama Director of Elections;
- Frank LaRose, Ohio Secretary of State;
- Amanda (Mandi) Grandjean, Ohio Director of Elections and Deputy Assistant Secretary of State; or
- Thomas Fitton, President of Judicial Watch.

Second, CREW requests copies of any communications, dated (1) May 16, 2022 through July 31, 2022 and (2) January 1, 2023 through March 31, 2023, pertaining to or mentioning (1) ERIC or (2) David Becker, former board member of ERIC, between Secretary of State Cord Byrd and any of the following individuals:

- Maria Matthews, Esq. Director, Florida Division of Elections;
- Amber Marconnet, Assistant Division Director, Florida Division of Elections;

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- Shane Hamlin, Executive Director, ERIC; or
- The Florida Bureau of Election Records.

Third, CREW requests copies of any communications, dated (1) September 1, 2020 through January 31, 2021 and (2) January 1, 2022 through May 16, 2022, pertaining to or mentioning (1) ERIC or (2) David Becker, former board member of ERIC, between former Secretary of State Laurel Lee and any of the following individuals:

- Cord Byrd, Florida Secretary of State;
- Maria Matthews, Esq. Director, Florida Division of Elections;
- Amber Marconnet, Assistant Division Director, Florida Division of Elections;
- Shane Hamlin, Executive Director, ERIC; or
- The Florida Bureau of Election Records.

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, Chapter 119 requires you to state the basis of the exemption you contend is applicable. Fla. Stat. § 119.07(1)(e). CREW further requests that you state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential. Fla. Stat. § 119.07(1)(f). If some portions of the requested records are properly exempt from disclosure, Chapter 119 requires you to redact those portions and produce the remainder of the requested records. Fla. Stat. § 119.07(1)(d).

CREW agrees to pay up to \$100 for copies of the requested records. If copying fees are expected to exceed this amount, or if you anticipate that "extensive use" of information technology resources or extensive clerical or supervisory assistance as defined in section 119.07(4)(d) will be needed to fulfill this request, please contact me.

If you believe this request is ambiguous or overly broad such that the requested information cannot be reasonably identified, please inform me so that the request can be revised or negotiated in accordance with how records are maintained and accessed in the ordinary course of the office's duties. I can be contacted by email at kfarchadi@citizensforethics.org or by phone at 202-408-5565.

Where possible, please produce records in electronic format. Please send the requested records to kfarchadi@citizensforethics.org and foia@citizensforethics.org, or to 1331 F Street, NW, Suite 900, Washington, DC 20004.

Please contact me if you have any questions about this request or foresee any problems in fully releasing the requested records. We anticipate you will fulfill your obligations under Chapter 119. If it is necessary to file an action to enforce the Public Records

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Act, the court may award reasonable costs of enforcement, including attorneys' fees. Fla. Stat. § 119.12.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kayvan Farchadi". The signature is written in a cursive style with a prominent horizontal line above the "F".

Kayvan Farchadi
Counsel