

June 22, 2023

By email: CORA@coloradoSOS.gov

CORA Custodian

1700 Broadway, Suite 550

Denver, CO 80290

Re: Colorado Open Records Act Request, CO Secretary of State

Dear CORA Officer:

Aly Belknap of Colorado Common Cause and Donald Sherman of Citizens for Responsibility and Ethics in Washington (CREW) submit this request for records pursuant to the Colorado Open Records Act (CORA), C.R.S. § 24-72-201 to 206. Specifically, Colorado Common Cause and CREW request the following information:

- Any and all records from October 1, 2020 through the date of this request related to threats of violence, actual violence, harassment, intimidation, stalking, or doxxing directed toward Secretary of State Jenna Griswold, the Secretary of State's office, or employees of the Secretary of State's office.
- Any and all records from October 1, 2020 through the date of this request related to threats of violence, actual violence, harassment, intimidation, stalking, or doxxing directed toward local elected officials, including County Clerks, County Recorders, or other elected officials and their staff.
- Any and all records from October 1, 2020 through the date of this request related to threats of violence, actual violence, harassment, intimidation, stalking, or doxxing directed toward volunteer election workers.
- Any and all records from October 1, 2020 through the date of this request related to threats of violence, actual violence, harassment, intimidation, stalking, or doxxing directed toward any other Colorado public official or employee, including but not limited to the governor, attorney general, courts, and their staff.
- Any and all records from October 1, 2020 through the date of this request related to law enforcement responses to or security precautions taken because of threats against any public officials, public employees, or volunteer election workers.
- Any and all records from October 1, 2020 through the date of this request related to guidance, recommendations, or policies generated in response to threats of violence, actual violence, harassment, intimidation, stalking, or doxxing directed toward any public official, public employee, or volunteer election worker.
- Any and all reports or summaries from October 1, 2020 through the date of this request related to threats of violence, actual violence, harassment, intimidation, stalking, or doxxing directed toward any public official, public employee, or volunteer election worker.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, or any

other media containing or constituting information that would be relevant to the above request. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records.

Please be advised that Colorado Common Cause and CREW intend to pursue all legal remedies to enforce their rights under CORA to access these documents. Accordingly, because litigation reasonably is foreseeable, the Colorado Secretary of State's office should institute an agency-wide preservation hold on documents potentially responsive to this request.

Fee Waiver Request

In accordance with C.R.S. § 24-72-205(4), Colorado Common Cause and CREW request a waiver of fees associated with processing this request for records. This request has been submitted for a "public purpose," specifically "nonprofit activities" and the disclosures likely will contribute to a better understanding of relevant government procedures by Colorado Common Cause, CREW, and the general public in a significant way. See *id.*

If it is your position that any portion of the requested records is exempt from disclosure, you are required to state the basis of the exemption you contend is applicable. C.R.S. § 24-72-204(3)(a). Colorado Common Cause and CREW further request that you state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential.

Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email agoldstein@citizensforethics.org or call (973) 820-8233. Where possible, please produce records in electronic format. Please send the requested records to agoldstein@citizensforethics.org. If it is necessary to send by mail, my physical address is 1331 F St. NW, Suite 900, Washington, D.C. 20004.

Thank you for your assistance in this matter.

Sincerely,

Aly Belknap
Executive Director, Colorado
Common Cause

Donald Sherman
Executive Vice President and Chief
Counsel, CREW