

June 27, 2023

By email: sospio@sos.nv.gov

Public Information Officer
Nevada Secretary of State
101 North Carson Street, Suite 3
Carson City, NV 89701

Re: Nevada Public Records Act Request, NV Secretary of State

Dear Public Information Officer:

Quentin Savvoir of NAACP Las Vegas and Donald Sherman of Citizens for Responsibility and Ethics in Washington (CREW) submit this request for records pursuant to the Nevada Public Records Act, N.R.S. Ch. 239. Specifically, NAACP Las Vegas 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 Barbara Cegavske, Secretary of State Cisco Aguilar, the Secretary of State's office, and 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, and 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 Nevada 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 NAACP LAs Vegas and CREW intend to pursue all legal remedies to enforce its right under the Nevada Public Records Act to access these documents. Accordingly, because litigation reasonably is foreseeable, the Nevada Secretary of State's office should institute an agency-wide preservation hold on documents potentially responsive to this request.

If it is your position that any portion of the requested records is exempt from disclosure based on confidentiality, you have the burden of proof to state the basis of the exemption you contend is applicable. NRS 239.0113. NAACP Las Vegas 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. My physical address is 1331 F St. NW, Suite 900, Washington, D.C. 20004.

Thank you for your assistance in this matter.

Sincerely,

Quentin Savvoir
President, NAACP Las Vegas

Donald Sherman
Executive Vice President and Chief
Counsel, CREW