



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

June 18, 2024

Mohave County Manager's Office
P.O. Box 7000
Kingman, AZ 86402-7000
warem@mohave.gov

RE: Public Records Law Request

Dear Public Records Officer:

Pursuant to the Arizona Public Records Law, A.R.S. §§ 39-121 et seq., Citizens for Responsibility and Ethics in Washington ("CREW") makes the following request for records.

Requested Records

1. All communications from November 1, 2020 to the date this request is processed sent by or to Ron Gould or Hildy Angius and any of the following organizations and people:
 - Voter Integrity Project (@voterintegrityproject.com)
 - Wendy Rogers
 - Sonny Borrelli

2. All records November 1, 2020 to the date this request is processed sent by or to Ron Gould or Hildy Angius mentioning any of the terms listed above in Part 1 of this request.

3. All records November 1, 2020 to the date this request is processed sent by or to Ron Gould or Hildy Angius mentioning any of the following terms:
 - Hand count
 - In-person voting
 - Mail-in voting
 - Mail-in ballots
 - Vote by mail
 - Voting by mail
 - Paper ballots
 - Security

- Secure
- Audit
- Signature verification
- Ballot duplication
- Rigged
- Overturn
- Overturning
- Election integrity
- Anomaly
- Anomalies
- Ballot drop boxes
- Stop the steal
- Stolen
- Illegals
- Soros
- Certify
- Certified
- Certification

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 those who were cc'ed or bcc'ed on any emails.

If it is your position that any portion of the requested records is exempt from disclosure, please provide an index of records or categories of records that have been withheld and the reasons the records or categories of records have been withheld. A.R.S. § 39- 121.01(D)(2). If some portions of the requested records are properly exempt from disclosure, please redact those portions and produce the remainder of the requested records.

This request is made for noncommercial purposes. 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. The release of information obtained through this request is not in CREW's financial interest.

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CREW requests a waiver of fees associated with processing this request for records. Disclosure of the requested records is in the public interest because CREW intends to analyze the information responsive to this request and share its analysis with the public. The public has a significant interest in the administration and certification of elections in Arizona, including the activities of those tasked with overseeing elections who may be involved in efforts to undermine public confidence in elections in Arizona.¹ The requested records would contribute to public understanding of operations of the government, including whether Arizona public officials have communicated with external entities and individuals engaged in efforts to cast doubt on election results.

Because this request is made for noncommercial purposes, CREW requests that if the fee waiver is denied, any fees charged in connection with processing this request be limited to copying and postage charges, if applicable.² If costs or fees are expected to exceed \$100, please contact me at (202) 408-5565 or jpilant@citizensforethics.org.

Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at jpilant@citizensfortethics.org or call me at (202) 408-5565. Where possible, please produce records in electronic format. Please send the requested records to foia@citizensforethics.org or by mail to Jordan Pilant, Citizens for Responsibility and Ethics in Washington, 1331 F St. NW, Suite 900, Washington, D.C. 20004.

Sincerely,



Jordan Pilant

¹ See, e.g., *Democracy Under Threat: A Spotlight on 204 Officials Who Could Undermine Our Elections*, Informing Democracy (Apr. 20, 2023), <https://www.informingdemocracy.org/research-library/democracy-under-threat>.

² A.R.S. § 39-121.01(D)(1); see also *Hanania v. City of Tucson*, 128 Ariz. 135, 624 P.2d 332 (Ct. App. 1980). This request is for noncommercial purposes, so additional fees provided for under A.R.S. § 39-121.03(A) are not applicable and should not be assessed.