CREW

CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

June 20, 2024

SUBMITTED VIA ONLINE FORM

Boulder County

RE: Open Records Act Request

Dear Open Records Officer:

Citizens for Responsibility and Ethics in Washington ("CREW") submits this request for records pursuant to the Colorado Open Records Act ("CORA"), C.R.S. § 24-72-201 to 206.

Requested Records

All records November 1, 2020 to the date this request is processed sent by or to Theresa Watson 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 any portion of the requested records is exempt from disclosure, please cite each specific exemption you feel justifies the refusal to release the information and notify CREW of the appeal procedures available under the law. CREW requests that you state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential. If some portions of the requested records are properly exempt from disclosure, you are required to redact those portions and produce the remainder of the requested records.

Fee Waiver Request

In accordance with C.R.S. § 24-72-205(4), CREW requests a waiver of fees associated with processing this request for records. This request has been submitted for a "public purpose," specifically "nonprofit activities," and it will likely contribute to a better understanding by the general public of the views of operations and activities of the government. *See id.* The public has a significant interest in the administration and certification of elections in Colorado, including the activities of those tasked with overseeing elections who may be involved in efforts to undermine public confidence in elections in Colorado. The requested records would contribute to public understanding of operations of the government, including whether Colorado public officials have communicated with external entities and individuals engaged in efforts to cast doubt on election results. Furthermore, the request is primarily and fundamentally for non-commercial purposes.

CREW is a nonprofit 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 working to reduce the influence of money on politics, and the public's understanding of the government's activities would be enhanced through CREW's analysis

and publication of these records. CREW uses a combination of research, litigation, and advocacy to advance its mission. CREW intends to analyze the information responsive to this request and to share its analysis with the public through reports, press releases, or other means. The release of information obtained through this request is not in CREW's financial interest.

CREW routinely disseminates information obtained through records requests to the public in several ways. For example, CREW's website receives hundreds of thousands of page views every month. The website includes blogposts that report on and analyze newsworthy developments regarding government ethics, corruption, and money in politics, as well as numerous reports CREW has published to educate the public about these issues. These reports frequently rely on government records obtained through records requests. CREW also posts the documents it obtains through records requests on its website.

Under these circumstances, CREW satisfies fully the criteria for a fee waiver. If there are any fees for searching or copying these records, however, please inform CREW if the cost will exceed $100.

Conclusion

The law requires that this request be responded to and fulfilled promptly, barring extenuating circumstances. C.R.S. §§ 24-72-201 to 206. If access to the records CREW is requesting will take an extended period of time, please contact CREW with a written explanation that states when the requested record will be produced and specifies with particularity why the records cannot be produced sooner.

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at [redacted] or call me at (202) 408-5565. Also, if CREW's request for a fee waiver is denied, please contact our office immediately upon making such a determination.

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, [redacted]

Sincerely,

Jordan Pilant

Jordan Pilant