CREW

CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

June 12, 2024

**SUBMITTED VIA ONLINE FORM**

Fulton County
Shalanda M.J. Miller, Official Custodian of Records
Office of the County Attorney
141 Pryor Street, S.W.
Suite 4038
Atlanta, GA 30303
ORR@FultonCountyGA.gov

**RE: Open Records Act Request**

Dear Open Records Officer:

Citizens for Responsibility and Ethics in Washington ("CREW") submits this request for records from Fulton County pursuant to the Georgia Open Records Act, O.C.G.A. § 50-18-70.

**Requested Records**

1. All communications from November 1, 2020 to the date this request is processed sent by or to Michael Heekin or Julie Adams and any of the following organizations:
    - True the Vote (@truethvote.org)
    - Restoring Integrity and Trust in Elections (@riteusa.org)
    - Election Integrity Network (@whoscounting.us)
    - The Heritage Foundation (@heritage.org)
    - The Election Research Institute (@electionresearchinstitute.org)
    - VoteRef (@voteref.com)
    - Foundation for Government Accountability (@thefga.org)
    - Honest Elections Project (@honestelections.org)
    - ALEC Action (@alecaction.org)
    - Election Transparency Initiative (@electiontransparency.org)
    - Virginia Fair Elections Project (@vafairelections.org)
    - The America Project (@americaproject.com)

- Vote Your Vision (@voteyourvision.org)
- Public Interest Legal Foundation (@publicinterestlegal.org)
- The Center for Election Integrity
- America First Policy Institute (@americafirstpolicy.com)
- Tea Party Patriots Action (@teapartypatriots.org)
- Conservative Legal Defense and Education Fund (@cldef.org)
- Conservative Partnership Institute (@cpi.org)
- Election Integrity Force (@electionintegrityforce.com)
- Election Integrity Fund
- American Voters' Alliance (@americanvotersalliance.org)
- The Amistad Project (@theamistadproject.org)
- Thomas More Society (@thomasmoresociety.org)
- The American Greatness Fund
- Liberty University's Falkirk Center
- America's Future (@americasfuture.org)
- Election Fairness Institute (@electionfairnessinstitute.org)
- Allied Security Operations Group
- Cyber Ninjas

2. All records November 1, 2020 to the date this request is processed sent by or to Michael Heekin or Julie Adams mentioning any of the terms listed above in Part 1 of this request.

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.

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.

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 to share its analysis with the public. The public has a significant interest in the administration and certification of elections in

Georgia, including the activities of those tasked with overseeing elections who may be involved in efforts to undermine public confidence in elections in Georgia.[1] The requested records would contribute to public understanding of operations of the government, including whether Georgia public officials have communicated with external entities and individuals engaged in efforts to cast doubt on election results.

If costs or fees for copying and postage charges in connection with processing this request are expected to exceed $100, please contact me at (202) 408-5565 or [redacted]

**Conclusion**

Pursuant to O.C.G.A. § 50-18-70(f), please produce these records within three business days. 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 within three business days. CREW requests that you state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential. If responsive records exist but are not available within three business days, please provide "a written description of such records, together with a timetable for their inspection and copying." *Id.* If some portions of the requested records are properly exempt from disclosure, please redact those portions and produce the remainder of the requested records.

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at jpilant@citizensforethics.org and foia@citizensforethics.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, [redacted]

Sincerely,

Jordan Pilant

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.