CREW

CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

June 13, 2024

BY EMAIL: VBoyer@EsmeraldaCountyNV.org

Esmeralda County Recorder/Auditor Vera Boyer
P.O. Box 458
Goldfield, NV 89013

RE: Public Records Act Request

Dear Open Records Officer:

Pursuant to the Nevada Public Records Act, N.R.S. Chapter 239, 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 De Winsor and any of the following organizations and people:
    - 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
- Election Integrity Project Nevada
- Election Integrity Project of Nevada
- Sharron Angle
- Jim Merchant
- Robert Beadles

2. All records November 1, 2020 to the date this request is processed sent by or to De Winsor 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.

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, please redact those portions and produce the remainder of the requested records, as required by N.R.S. § 239.010(3).

Fee Waiver Request

Pursuant to N.R.S. § 239.052(2), CREW requests a waiver of fees associated with this request for records, except for the items enumerated in the policy, to the extent applicable to this request. Please consult with CREW on any fees the agency expects it may assess.

Disclosure of the requested records is in the public interest because it will likely contribute to a better understanding by the general public of the views of policymakers and of operations and activities of the government. The public has a significant interest in the administration and certification of elections in Nevada, including the activities of those tasked with overseeing elections who may be involved in efforts to undermine public confidence in elections in Nevada. The requested records would contribute to public understanding of operations of the government, including whether Nevada 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 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 working to reduce the influence of money on politics. 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. In addition, CREW will disseminate any documents it acquires from this request to the public through its website, www.citizensforethics.org. 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.

Conclusion

If you anticipate any delay or denial of this request, please provide a written explanation for the delay or denial within five business days, as required by law. *See* N.R.S. § 239.0107. 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