



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

June 12, 2024

SUBMITTED VIA ONLINE FORM

Kristin Mavromatis
Public Information Manager
Mecklenburg County Board of Elections
P.O. Box 31788
Charlotte, NC 28231
Via Online Portal

RE: Public Records Act Request

Dear Public Information Manager Mavromatis:

Pursuant to the North Carolina Public Records Act, as codified at North Carolina General Statutes ch. 132, 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 Elizabeth McDowell or Mary Summa 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 Elizabeth McDowell or Mary Summa 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, direct messaging systems (such as iMessage, WhatsApp, Signal or Twitter direct messages), facsimiles, telephone messages, voicemail messages, instant messaging systems such as Lync or ICQ, 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. Please do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stores outside of official files are subject to the Public Records Act.¹

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

¹ See Atty. Gen. Josh Stein, *North Carolina Open Government Guide* at 22 (2019), <https://ncdoj.gov/download/141/files/17891/2019-open-government-guide> ("Emails about official business are public records even if they are sent using the personal email account of an employee or official.").

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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. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.

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

If CREW's fee waiver is denied and 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 jpilant@citizensforethics.org.

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 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