



August 14, 2018

Via Email

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Teresa Wynn Roseborough
Adam Klein

Secretary

Eleanor H. Smith

Treasurer

David Smith

General Counsel

Nicholas T. Christakos

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Mayor Paul Langford
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Re: Georgia Open Records Act Request Concerning the Proposed Elimination, Consolidation, or Other Changes to Voting Precincts and Polling Places

Dear Madams and Sirs:

Please take notice that pursuant to the Georgia Open Records Act (O.C.G.A. § 50-18-70, et seq.), you, which includes the individual members and employees of the Randolph County Board of Commissioners and Board of Elections and Registration, Election Supervisor's office, County Administrator and Clerk's office, and the Cuthbert and Shellman City Councils, City Clerks and Mayors, as well as these bodies collectively and any staff, consultants, and agents, are hereby requested to make available for review and copying all records (as defined by O.C.G.A. § 50-18-70(b)(2)) relating to all proposals, plans, investigations, or other activities relating to the elimination, consolidation, or other changes to Randolph County's voting precincts and polling locations during the past 12 months.

This request includes, but is not limited to, the following categories of documents, writings, electronically created and stored data, or other records:

1. All plans, maps, demographic profiles, drawings, photographs, GIS records, shapefiles, electronic files, lists, or other descriptions of Randolph County's existing voting precincts and polling locations.



2. All plans, maps, demographic profiles, drawings, photographs, GIS records, shapefiles, electronic files, lists, or other descriptions of Randolph County's proposed voting precincts and polling locations.

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3. All agendas, minutes, public notices, video or audio recordings, transcriptions, social media posts, or other records relating to public meetings or discussions of changes to Randolph County's voting precincts or polling locations during the past 12 months.

4. All records and communications evidencing all investigations during the past 12 months relating to proposed changes to Randolph County's voting precincts or polling locations.

5. All records evidencing the driving distances and estimated driving times from the current Randolph County polling places to the Randolph County Courthouse and the Shellman Train Depot.

6. All records evidencing all public transit that is available in Cuthbert and Shellman, including transit schedules and the cost per ride.

7. All records evidencing the 2018 budget for Randolph County elections, including line items for poll workers, poll managers and supervisors, voting machines, polling location fees and rent, and any other budgeted costs.

8. All records evidencing the specific dollar amount of expected cost savings to Randolph County as a result of the consolidation of voting precincts and polling places, including, but not limited to, the specific sources and amounts of such savings by category (i.e., staff, equipment, facilities, rent, utilities, etc.).

9. All records evidencing the staffing of each Randolph County poll location during the 2016 primary, runoff, and general elections, and the 2018 primary and runoff elections, including the number of poll workers, poll managers, and other staff for each shift and the hourly rates for each category of staff assigned to the polls.

10. All records of communications during the past 12 months involving members of the Randolph County Board of Commissioners and Board of Elections and Registration, Election Supervisor's office, County Administrator and Clerk's office, and the Cuthbert and Shellman City Councils, or their respective staff members, consultants and/or agents, concerning voting precinct or polling location changes during the past year, including, but not limited to, all emails, letters, text messages, notes, correspondence, or other electronic communications. This includes, but is not limited to, internal communications as well as those with the employees, liaisons, agents, consultants and servants of any



regional or other planning agency, the Georgia Secretary of State's office, any political party or candidate, or any Randolph County resident.

11. All records evidencing the assignment of poll workers and voting machines to the Randolph County Courthouse and the Shellman Train Depot following the consolidation of voting precincts in Randolph County for the November 2018 general election, including the cost therefor.

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12. All public notices or social media posts concerning proposed or actual Randolph County voting precinct consolidation or polling location changes during the past 12 months, including those in newspapers or on Facebook, Twitter, Medium, Tumblr, or other social media outlets.

13. All public notices of meetings held by the Randolph County Board of Elections and Registration since March 1, 2018.

14. All documents, writings, and other records evidencing all trainings, advice, recommendations, guidelines, rules, regulations, or other communications involving the Georgia Secretary of State or the Georgia Director of Elections or their employees, agents, and servants since June 25, 2013, relating to or involving polling location or voting precinct changes and consolidations.

Please note that we are prepared to pay reasonable costs incurred in the production of the requested records pursuant to this GORA, but we request that you provide us with a good faith estimate of the charges for producing these records in advance by contacting me at 202-662-8389 for authorization if the anticipated costs exceed \$50.00. If this request is denied in whole or in part, we ask that you cite in writing the specific statutory exemption upon which you have relied as required by O.C.G.A. § 50-18-71(d).

Please note that we are amenable to receiving the records via email in electronic formats to save the cost of reproducing them in paper form or on DVDs. Acceptable formats include PDFs of paper documents, the native electronic format of shapefiles and GIS records, or other commonly used electronic formats.

To the extent that you intend to comply with this request but anticipate that it may take longer than three business days to produce some of the records, we request that you produce records as they become available rather than delaying production until all responsive documents have been gathered.

Thank you for your attention and anticipated cooperation in this matter.



**LAWYERS' COMMITTEE FOR
CIVIL RIGHTS
U N D E R L A W**

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Regards,

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