



Via U.S. Mail and Facsimile

December 2, 2016

Agency Open Records Officer
Pennsylvania Department of State
306 North Office Building
401 North Street
Harrisburg, Pennsylvania 17120
Fax: (717) 214-9899
Email: RA-RTK-DOS@pa.gov

Dear Sir or Madam:

Under the Pennsylvania Right to Know Law, 65 §66.1, *et seq.*, I am requesting on behalf of Freedom Watch copies of the following public records held in the possession, custody, or control of the Pennsylvania Department of State, Bureau Of Commissions, Elections And Legislation, including any of its local, County, or regional offices.

I am also requesting expedited treatment of this Right to Know Law records request:

- 1) Inspection of the ballots cast in Pennsylvania in the November 8, 2016, general election and/or all paper, electronic, or computerized records constituting recordation of votes cast in Pennsylvania in the November 8, 2016, general election for president of the United States.

(Please include all responses of a voter in reference to the election for president whether a write-in vote for a candidate not named on the ballot, an under vote apparently choosing no one for president, an over vote apparently choosing more than one candidate for president, or a normal vote for a candidate. Of course, a vote for a presidential candidate in this context refers to a vote for the electors nominated to vote for a candidate for president along with a companion candidate for vice president.)

- 2) Inspection of voting information for each precinct including for each precinct on November 8, 2016, the number of voters who cast ballots, the tabulated results, the number of voters registered in the precinct, any reported problems, provisional ballots received, voters refused the opportunity to vote, and other information maintained for each precinct's

voting on November 8, 2016. If records containing this information is not maintained on a precinct by precinct level, provide records at the organizational level at which such records are available.

- 3) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to any change to the number of votes tabulated for the office of president of the United States from the November 8, 2016, general election as a result of any recount, challenge, or context.
- 4) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to any request for a recount of the votes cast and/or vote totals and/or election results in Pennsylvania of the November 8, 2016, general election for president of the United States.
- 5) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes between presidential candidate Jill Stein and/or the Green Party and the Pennsylvania Elections Commission concerning any recount of, contest of, challenge to, or investigation of voting in the November 8, 2016, general election for president of the United States.
- 6) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes between presidential candidate Hillary Clinton and/or Hillary Clinton's campaign "Hillary for America" and the Pennsylvania Elections Commission concerning any recount of, contest of, challenge to, or investigation of voting in the November 8, 2016, general election for president of the United States.
- 7) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes between the Democratic National Committee and the Pennsylvania Elections Commission concerning any recount of, contest of, challenge to, or investigation of voting in the November 8, 2016, general election for president of the United States.
- 8) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to any evidence of fraud or "hacking" (i.e., any manipulation or alteration of data) in the votes cast and/or vote totals and/or election results in Pennsylvania of the November 8, 2016, general election for President of the United States.

- 9) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to the actual performance of voting machines in terms of reliability and accuracy in Pennsylvania in the November 8, 2016, general election for President of the United States (i.e., a voting machine meaning any mechanical and/or electronic device or machine used in Pennsylvania to allow voters to cast their votes and to record or tabulate the total number of votes cast for each candidate or referendum).
- 10) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to any defects in voting machines in Pennsylvania in the 2016 primary or general election (i.e., a voting machine meaning any mechanical and/or electronic device or machine used in Pennsylvania to allow voters to cast their votes and to record or tabulate the total number of votes cast for each candidate or referendum).
- 11) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to any vulnerabilities of voting machines used in Pennsylvania during the November 8, 2016, general election to unauthorized manipulation or alteration of vote totals or information on votes cast for candidates (i.e., any mechanical and/or electronic device or machine used in Pennsylvania to allow voters to cast their votes and to record or tabulate the total number of votes cast for each candidate or referendum).
- 12) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to any defects or malfunctions in voting machines (i.e., any mechanical and/or electronic device or machine used in Pennsylvania to allow voters to cast their votes and to record or tabulate the total number of votes cast for each candidate or referendum) in the 2016 primary or general election.
- 13) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to any reports by Pennsylvania voters or officials of voting irregularities or suspicious activities in the votes cast and/or vote totals and/or election results in Pennsylvania of the November 8, 2016, general election for President of the United States.
- 14) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to procedures, instructions, or directions created

specifically for the recount of votes cast in Pennsylvania of the November 8, 2016, general election for President of the United States.

- 15) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to any decision not to conduct a manual recount of votes cast in Pennsylvania of the November 8, 2016, general election for President of the United States.
- 16) A copy of any and all documents, records, correspondence, letters, electronic mail (email) messages, cables, memoranda, reports, summaries, or faxes relating to the different types or levels of challenges, recounts, audits, and/or investigations of the November 8, 2016, general election for President of the United States available under Pennsylvania law and the procedures of the Pennsylvania Election Commissions.

Under the Pennsylvania Right to Know Law, 65 §66.1, *et seq.*, all governmental records are presumed to be public records unless disclosure is barred by: (1) state or federal law or regulation; (2) judicial order; (3), privilege, e.g., attorney-client or doctor-patient; or (4) one of the exceptions in Section 708 of the Right-to-Know Law. The burden is on the government agency to establish why the record is not available.

The Pennsylvania Right to Know Law requires a response within five business days. If access to the records I am requesting will take longer than this amount of time, please contact me with information about when I might expect copies or the ability to inspect the requested records.

All Commonwealth of Pennsylvania Agencies are subject to the Right-to-Know Law, including: Any office, department, authority or other parts of the executive branch, state-affiliated entities, independent agencies, and includes the Governor, Attorney General, Auditor General and the Treasury Department.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

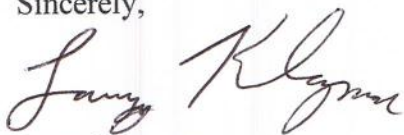
If notwithstanding our request for a fee waiver, there are any fees for searching or copying these records, please inform me if the cost will exceed \$100. However, I request a waiver of all fees for this request.

Disclosure of the requested information to Freedom Watch is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in any commercial interest. Freedom Watch is engaged in the active dissemination of public information as is evident by our ongoing public interest legal work and continual fight against corruption within the United States government. Freedom Watch's website, www.freedomwatchusa.org serves as a primary means of disseminating that

information, and is seen by millions of people annually. Freedom Watch is an Internal Revenue Code §501(c)(3) non-profit organization.

Thank you for handling this request.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Klayman".

Larry Klayman
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Washington, D.C. 20006
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