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May 12, 2017

Via USPS Certified Mail and email

Office of the Governor
Attn: Legal Counsel
200 West Washington St.
State House Room 206
Indianapolis, IN 46204
govholcomb@gov.in.gov

Dear Legal Counsel:

The NAACP Legal Defense & Educational Fund, Inc. (LDF) is the nation's oldest civil and human rights law organization. LDF was founded in 1940 by Thurgood Marshall, who later became the first African-American Supreme Court Justice, and, since its inception has worked to defend and advance the voting rights of African Americans and protect the integrity of our nation's democracy. On behalf of LDF, and in response to the Executive Order establishing the Presidential Advisory Commission on Election Integrity ("Commission") to review alleged voter fraud in the American electoral system, I hereby request copies of the following documents pursuant to the Indiana Access to Public Records Act, § 5-14-3-1 et seq.:

- Any and all documents shared with the Office of the Governor regarding the formation of the Commission, including but not limited to all correspondence, statements, memoranda, and draft charters of the Commission from November 8, 2016 to the present.
- Any and all communications relating to the service of former Governor Michael Pence on the Commission.
- Any and all communications relating to the responsibilities of former Governor Michael Pence on the Commission.
- Any and all communications with members of the White House or Office of the Vice President relating to voter fraud and/or voting irregularities in national, state or local elections from November 8, 2016 to the present.
- Any and all records, reports, transcripts, minutes, appendices, working papers, drafts, studies, agendas, or other documents that were made available to or prepared for the White House or Office of the Vice President with respect to voting irregularities from November 8, 2016 to the present.



If possible, please provide copies of these documents in an electronic format no later than 7 days after receipt of this request. *See* IC § 5-14-3-4.4(c)(2). If photocopies are provided, then LDF respectfully requests a waiver of copying and other fees, as it is a 501(c)(3), non-profit organization seeking these documents in the public interest and because the information is likely to contribute significantly to the public's understanding of alleged voting irregularities and government integrity. The information requested will not be used for commercial purposes. If the Office of the Governor declines LDF's request for a waiver, then please provide an invoice, detailing reasonable standard charges, prior to fulfilling this request.

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. In the event that you have any questions concerning the type or scope of materials we have requested, please contact me by email or by telephone at 212-965-2200.

Sincerely yours,

Sherrilyn A. Ifill
President & Director Counsel
NAACP Legal Defense Fund
40 Rector Street
New York, NY 10006