

New York Office
40 Rector Street, 5th Floor
New York, NY 10006-1738

T 212.965.2200
F 212.226.7592

www.naacpldf.org



Washington, D.C. Office
1444 Eye Street, NW, 10th Floor
Washington, D.C. 20005

T 202.682.1300
F 202.682.1312

May 11, 2017

Via Regular mail and online form

Laurie Day
Chief, Initial Request Staff
Office of Legal Policy
Suite 11050
1425 New York Avenue, NW
Washington, DC 20530-0001

Dear Ms. Day:

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 Freedom of Information Act, 5 U.S.C. § 552:

- Any and all drafts and final memoranda, opinions, or correspondence regarding review of the Executive Order issued for the creation of the Commission by the Trump administration on May 11, 2017 for lawfulness by the U.S. Department of Justice ("DOJ"), as required by Executive Order 11,030 § 2, 27 Fed. Reg. 5,847 (June 19, 1962).
- Any and all correspondence transmitting the Executive Order for DOJ review on or before May 11, 2017.
- Any and all documents 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 documents, including drafts, regarding the budget, appropriation and funding of the Commission, including but not limited to the procurement of office space, staff, and research from November 8, 2016 to the present.
- Any and all documents regarding anticipated expenditures of the Commission.



- Any and all requests for funding from congressional or private sources for the formation and maintenance of the Commission from November 8, 2016 to the present.
- Any and all communications relating to voter fraud and/or voting irregularities, including but not limited to, communications with academics, think tanks, not-for-profit organizations, and/or experts, from November 8, 2016 to the present.
- List of all members of the Commission and their present affiliation.
- The entirety of the Commission's charter, including but not limited to the Commission's objectives and scope, its anticipated duration, its hierarchy and reporting obligations, and the sources of its authority.
- Any and all meeting notices and/or statements to members of the Commission regarding alleged voter fraud 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 or by the members of the Commission, including but not limited to documentation of voting irregularities from November 8, 2016 to the present.
- Any and all documentation of alleged voter fraud, including but not limited to the name and location of the polling precinct in which alleged voter fraud occurred; the name, race and age of person who reported alleged voter fraud; the name, race and age of person accused of voter fraud; state and/or federal actions taken; date of action; and reason of action.

If possible, please provide copies of these documents in an electronic format no later than 20 business days after receipt of this request pursuant to 5 U.S.C. § 552 (a)(3) and (6). 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. *Id.* §552(a)(4)(A)(iii). The information requested will not be used for commercial purposes. If the Office of Legal Policy declines LDF's request for a waiver, then please provide an invoice, detailing reasonable standard charges, prior to fulfilling this request. *Id.* §552(a)(4)(A)(ii).



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,

A handwritten signature in black ink that reads 'Sherrilyn A. Ifill'. The signature is written in a cursive style with a large initial 'S'.

Sherrilyn A. Ifill
President & Director Counsel