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November 12, 2020

By email to: foia@elections.virginia.gov

Arielle A. Schneider
FOIA Coordinator
Virginia Department of Elections
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219

Re: Freedom of Information Act Request of The Virginia Project

Dear Ms. Schneider:

Our firm represents The Virginia Project,¹ and on its behalf, submits this Freedom of Information Act request.

This request is made pursuant to the Virginia Freedom of Information Act, Va. Code §§ 2.2-3700, *et seq.*, to request the State Board to preserve and provide copies in electronic format to our client the following records with respect to the November 3, 2020 general election:

- scans of all ballots, by city/county unit, and by precinct, included in the official count; and
- scans of all ballots, by city/county unit, and by precinct, not included in the official count.

Should the requested scans of the ballots not be available, we request that the original paper ballots preserved by jurisdiction and precinct be made available for inspection.

If the requested records are exclusively in the possession and control of another state agency, local election boards, or others, please advise us as soon as possible, so requests can be made directly to those entities.

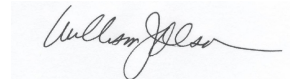
¹ <https://virginiaproject.com/>.

If certain portions of responsive records are deemed exempt from disclosure, please provide the non-exempt portions, along with an explanation of any records (or portions thereof) withheld.

We ask that this request be processed based on the principle that FOIA allows for cost recovery, not revenue generation, and based on the Division of Legislative Services' suggestion that fees be waived for many requests.² If the cost of processing this request exceeds \$200, we would appreciate a written estimate. To the extent the costs are less than \$200, we will guarantee payment.

Please feel free to contact me at the number above if you have questions or require additional information. Under the law, a response must be received within five (5) business days. *See* Va. Code § 2.2-3704.B. We would appreciate a response to this request within that time frame.

Sincerely yours,



William J. Olson

WJO:gw

cc: The Virginia Project

Hon. Robert H. Brink
Robert.Brink@elections.virginia.gov
Chairman of the Board
Virginia Department of Elections
Washington Building, First Floor
1100 Bank Street
Richmond, VA 23219

² <http://foiacouncil.dls.virginia.gov/ref/FOIACCharges.pdf>.