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February 11, 2021

Scott A. McMillan
The McMillan Law Firm
4670 Nebo Drive, Suite 200
La Mesa, CA 91941-5230

RE: Colusa County PRA Request – November 3, 2020 General Election

Dear Scott A. McMillan:

Colusa County received your Public Records Act request dated January 21, 2021, seeking over 60 different requests for documents regarding the County's November 2020 election. On January 29, 2021, I sent you a letter extending the time for the County to respond. Please be advised that due to the large number of requests, the County will need additional time to provide you with some of the requested information and can do so on a rolling basis. To date, we have identified approximately 185 pages of documents. The cost of reproduction is \$.10 per page, and we estimate postage in the amount of \$15.50 via U.S. Priority Mail. Checks should be made payable to the County of Colusa.

Additionally, some of the requested documents are subject to various exemptions and may not be disclosed under the California Public Records Act, as set forth in more detail below. Other documents may be readily accessed on the California Secretary of State's website at <https://www.sos.ca.gov/elections/ovsta/frequently-requested-information/dominion-voting>, and the Colusa County website under the Elections tab, at <https://www.countyofcolusa.org/197/Elections>. The requests and the County's responses are set forth as follows.

1. Provide those documents identifying, by date, time and means, all synchronization transmissions between the California Secretary of State and the county Registrar of Voters.

The County has made a diligent search to find the requested documents but we have not been able to locate any documents responsive to this request.

2. Provide those documents with the results of each synchronization transmission between the California Secretary of State and the county Registrar of Voters, by number of registrants confirmed as valid, and those that are identified as invalid.

The County has made a diligent search to find the requested documents but we have not been able to locate any documents responsive to this request.

3. Provide those documents which reflect notifications from the Secretary of State requesting or directing modifications to a voter's registration record between September 1, 2020 and November 15, 2020.

The County has made a diligent search to find the requested documents but we have not been able to locate any documents responsive to this request.

4. Provide those documents that reflect, in summary form, the modifications to the voter registration record, by date, time, and by any unique voter registration number or name of voter, for those records modified between September 1, 2020 and November 15, 2020.

The County has made a diligent search to find the requested documents but we have not been able to locate any documents responsive to this request.

5. Provide those documents identifying where, by geographic location, ballots were counted in the County between October 15, 2020, through November 30, 2020.

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

6. Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting "Active management (inventory, tracking, and correction) of all software on the network so that only authorized software is installed and can execute" took place in compliance with 2 CCR § 19064(c)(2).

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

7. Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 5, 2020 reflecting "active management (tracking, reporting, and correction) of the security configuration of laptops, servers, and workstations in order to prevent attackers from exploiting vulnerable services and settings" took place in compliance with 2 CCR § 19064(c)(3).

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

8. Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting "Active management (tracking, control, and correction) of the ongoing operational use of ports, protocols, and services on networked devices in order to minimize vulnerabilities available for attack" took place in compliance with 2 CCR § 19064(c)(9).

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

9. Provide the log files for all data traffic, including connection requests accepted and refused, between the county's election information file and any other location between September 1, 2020 and November 15, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

10. Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting " Tracking, controlling, preventing, and correcting the security use of wireless local area networks, access points, and wireless client systems" which took place in compliance with 2 CCR § 19064(c)(15).

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

11. Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting the inventory and identification of all wireless connections in the County's ballot processing location.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

12. Provide those documents, i.e., logs, narratives of inspection created between September 1, 2020 and November 15, 2020 reflecting the inventory and identification of all wireless-capable devices in the County's ballot processing location.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

13. Provide those documents, identifying by serial number, MAC address, device, and location, and the custodian of all wireless-capable devices in the County' ballot processing location between November 2, 2020 and November 13, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

14. Provide those documents, reflecting any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) operational prior to October 15, 2020, which took place in compliance with 2 CCR § 19064(c)(19).

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

15. Provide those documents, reflecting training on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3). Any non-exempt documents will be identified and produced.

16. Provide those documents, reflecting roles on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3). Any non-exempt documents will be identified and produced.

17. Provide those documents, reflecting communications on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3). Any non-exempt documents will be identified and produced.

18. Provide those documents, reflecting management oversight on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3). Any non-exempt documents will be identified and produced.

19. Provide those documents reflecting the identity of each person that has accessed the routers for the county's EMS and election information systems between October 15, 2020 and November 13, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

20. Provide those documents which identify all persons, not permanently employed by the County, who accessed servers or routers of the EMS and election information system between October 15, 2020 and November 14, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

21. Provide documents which identify all persons authorized by the county who accessed servers or routers of the EMS and election information system between October 15, 2020 and November 14, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

22. Provide those documents which identify all persons with USB or "flash drives" that were allowed access to any location where votes were tallied or processed in the County.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

23. Provide those documents which identify all persons with sign-on authentication authorization as a direct user to the county's EMS and election information system between September 15, 2020 and December 1, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

24. Provide the log files for the county's EMS and election information system with entries between September 15, 2020 and December 1, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

25. Provide those documents or records reflecting a network topology plan or map referencing the devices attached each other device within the county's EMS and election information system.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

26. Provide those documents or records reflecting the log monitoring tools used to send real-time alerts and notifications.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

27. Provide the "real-time alerts and notifications", as referenced in 2 CCR 19064(e)(3) sent between September 1, 2020 through December 10, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

28. Provide those documents or records reflecting review, at any time, of "any errors, abnormal activities, and any system configuration changes", identified between September 1, 2020 through December 10, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

29. Provide those documents which reflect "any errors" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

30. Provide those documents which reflect "abnormal activities" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

31. Provide those documents which reflect "system configuration changes" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

32. Provide those documents which reflect "unauthorized use" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

33. Provide those documents which reflect "suspected breach" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

34. Provide those documents which reflect "denial of service attack" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.

Records pertaining to any security systems and information regarding the voting systems or software utilized by the County are subject exempt from disclosure pursuant to California Government Code §6254(k), §6254(aa), §6254.19,6255(a), and 2 CCR §19064(a), §19064(c)(3).

35. Provide those documents reflecting a report to the Secretary of State Elections Division Help Desk of a "detected unauthorized use, suspected breach, or denial of service attack" between September 1, 2020 through December 10, 2020, as required under 2 CCR 19064 (g).

The County has made a search to find the requested documents but we have not been able to locate any documents responsive to this request.

36. All records reflecting change in registration status submitted to the statewide voter system by the county due to felony status processed between September 1, 2020, and November 10, 2020.

Any responsive documents in the County's possession may contain confidential voter information, which cannot be produced absent a valid application to purchase/view voter registration information in compliance with California law, including but not limited to California Elections Code §2194, California Government Code §6254.4, and 2 CCR §19001 et seq.

37. All records reflecting change in registration status submitted to the statewide voter system by the county due to federal felony status processed between September 1, 2020, and November 10, 2020.

Any responsive documents in the County's possession may contain confidential voter information, which cannot be produced absent a valid application to purchase/view voter registration information in compliance with California law, including but not limited to California Elections Code §2194, California Government Code §6254.4, and 2 CCR §19001 et seq.

38. All records reflecting change in registration status submitted to the statewide voter system by the county due to county death records reflecting voter to be deceased processed between September 1, 2020, and November 10, 2020.

Any responsive documents in the County's possession may contain confidential voter information, which cannot be produced absent a valid application to purchase/view voter registration information in compliance with California law, including but not limited to California Elections Code §2194, California Government Code §6254.4, and 2 CCR §19001 et seq.

39. All records reflecting the total cancellations directed by the Secretary of State processed by the county between September 1, 2020, and November 10, 2020.

Any responsive documents in the County's possession may contain confidential voter information, which cannot be produced absent a valid application to purchase/view voter registration information in compliance with California law, including but not limited to California Elections Code §2194, California Government Code §6254.4, and 2 CCR §19001 et seq.

40. All records reflecting searches of county felony records between September 1, 2020, and November 10, 2020.

The County has made a search to find the requested documents but we have not been able to locate any documents responsive to this request.

41. All records reflecting searches of county death records between September 1, 2020, and November 10, 2020.

The County has made a search to find the requested documents but we have not been able to locate any documents responsive to this request.

42. All records reflecting county searches of DMV Change of Address (DMV COA) between September 1, 2020, and November 10, 2020.

The County has made a search to find the requested documents but we have not been able to locate any documents responsive to this request.

43. All records reflecting total submissions by changes in the registration record to

the statewide voter registration system in accordance with Section 19061, between September 1, 2020, and November 10, 2020.

Any responsive documents in the County's possession may contain confidential voter information, which cannot be produced absent a valid application to purchase/view voter registration information in compliance with California law, including but not limited to California Elections Code §2194, California Government Code §6254.4, and 2 CCR §19001 et seq.

44. Those documents reflecting the dates of certifications of information provided to the Secretary of State according to 2 CCR § 19086(b).

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

45. Those documents reflecting the date of generation of the official list extract from the statewide voter registration system for the purpose of conducting the 2020 General Election.

The County has made a search to find the requested documents but we have not been able to locate any documents responsive to this request.

46. Those documents reflecting the date of each subsequent or supplemental rosters, after the initial roster for the purpose of conducting the 2020 General Election.

The County has made a search to find the requested documents but we have not been able to locate any documents responsive to this request.

47. All certifications executed by any county election official for the November 3, 2020 General Election.

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

48. The number of ballots determined by the county through adjudication for the

November 3, 2020 election.

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

49. All ballots duplicated by the county through adjudication for the November 3, 2020 election.

The County has made a search to find the requested documents but we have not been able to locate any documents responsive to this request.

50. Those documents that identify the records of ballots duplicated for the November 3, 2020 election.

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

51. Those documents that identify the records of ballots adjudicated for the November 3, 2020 election.

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

52. Those documents that identify the records of changes to ballots made for the November 3, 2020 election.

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

53. All correspondence, whether such correspondence occurred by physical letter,

email, text message, with any person employed by or affiliated with Dominion Voting Systems, Inc. between April 1, 2019 through December 10, 2020.

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

54. All correspondence, whether such correspondence occurred by physical letter, email, text message, with any person employed by or affiliated with the California Secretary of State's Office of Voting Systems Technology Assessment between April 1, 2019 through December 10, 2020.

The County is in the process of identifying responsive documents that will be produced. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

55. All electronic documents containing the phrase "Image Cast Remote 5.10".

The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

56. All electronic documents containing the phrase "Image Cast Remote 5.IQA".

The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

57. All electronic documents containing the phrase "Image Cast Remote 5.2".

The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet

known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

58. All electronic documents containing the phrase "Suite 5.10A".

The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

59. All electronic documents containing the phrase "Suite 5.10".

The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

60. All electronic documents containing the phrase "Suite 5.2".

The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

61. All electronic documents containing the phrase "ImageCast Evolution 5.10.9.3".

The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

62. All electronic documents containing the phrase "ImageCast ICX 5.10.11.11.".

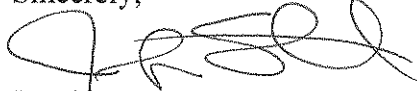
The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

63. All electronic documents containing the phrase "Eric Coomer"

The County has not yet been able to identify responsive documents, but is continuing its efforts to determine if responsive documents exist. The cost of reproduction is \$.10 per page. The total number of responsive documents is not yet known, and the County will proceed to reproduce, redact and mail the records once the County has identified all non-exempt responsive documents and received payment for the cost of reproduction.

Please do not hesitate to contact me if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Sutton", written over a horizontal line.

Jennifer K. Sutton
Senior Deputy County Counsel