



DANIEL C. CEDERBORG
County Counsel

February 4, 2021

VIA U.S. MAIL AND E-MAIL

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RE: *Public Records Act Request dated January 25, 2021*

Dear Mr. McMillan:

The County of Fresno ("County") writes in response to your California Public Records Act request ("PRA Request") dated and received by the County Clerk/Registrar of Voters' Department ("Department") on January 25, 2021.

You have requested the following records:

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."
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."
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."
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."
5. "Provide those documents identifying where, by geographic location, ballots were counted in the County between October 15, 2020, through November 30, 2020."
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)."
7. "Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 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)."
 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)."
 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."
 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)."
 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."
 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."
 13. "Provide those documents, identifying by serial number, MAC address, device, and location, and the custodian of, all wireless-capable devices in the County's ballot processing location between November 2, 2020 and November 13, 2020."
 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)."
 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."
 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."

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."
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."
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."
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."
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."
22. "Provide those documents which identify all persons with USB or "flash drives" that were allowed access to any location where voters were tallied or processed in the County."
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."
24. "Provide the log files for the county's EMS and election information system with entries between September 15, 2020 and December 1, 2020."
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."
26. "Provide those documents or records reflecting the log monitoring tools used to send real-time alerts and notifications."
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."
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."
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."
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."
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."
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.”
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.”
 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.”
 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).”
 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.”
 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.”
 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.”
 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.”
 40. “All records reflecting searches of county felony records between September 1, 2020 and November 10, 2020.”
 41. “All records reflecting searches of county death records between September 1, 2020 and November 10, 2020.”
 42. “All records reflecting county searches of DMV Change of Address (DMV COA) between September 1, 2020 and November 10, 2020.”
 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.”
 44. “Those documents reflecting the dates of certifications of information provided to the Secretary of State according to 2 CCE § 19086(b).”
 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.”
 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.”
 47. “All certifications executed by any county election official for the November 3, 2020 General Election.”
 48. “The number of ballots determined by the county through adjudication for the

- November 3, 2020 election.”
49. “All ballots duplicated by the county through adjudication for the November 3, 2020 election.”
 50. “Those documents that identify the records of ballots duplicated for the November 3, 2020 election.”
 51. “Those documents that identify the records of ballots adjudicated for the November 3, 2020.”
 52. “Those documents that identify the records of changes to ballots made for the November 3, 2020 election.”
 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.”
 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.”
 55. “All electronic documents containing the phrase “Image Cast Remote 5.10”.”
 56. “All electronic documents containing the phrase “Image Cast Remote 5.10A”.”
 57. “All electronic documents containing the phrase “Image Cast Remote 5.2”.”
 58. “All electronic documents containing the phrase “Suite 5.10A”.”
 59. “All electronic documents containing the phrase “Suite 5.10”.”
 60. “All electronic documents containing the phrase “Suite 5.2”.”
 61. “All electronic documents containing the phrase “Image Cast Evolution 5.10.9.3”.”
 62. “All electronic documents containing the phrase “Image Cast ICX 5.10.11.11”.”
 63. “All electronic documents containing the phrase “Eric Coomer”.”

The County has determined that responding to your PRA Request will require the following: (1) the need to search for and collect the requested records from field facilities or other establishments that are separate from the office processing the request; and (2) the need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records that are demanded in a single request. Based on the foregoing, the County has determined that unusual circumstances exist which necessitate the extension of the County’s time to respond to your PRA Request by fourteen (14) additional days. (Government Code section 6253, subdivision (c)(1), (2).)

The County will notify you in writing on or before February 18, 2021 whether your PRA Request, in whole or in part, seeks copies of disclosable public records, and of the estimated dates when any records which are subject to disclosure under the California Public Records Act will be made available.

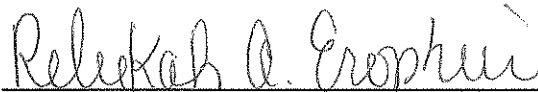
Because your PRA Request seeks a voluminous number of records, any production may need to be over a period of time, and so, we may need to ask you whether you wish certain records to be made available before others.

To provide all responsive records, it might be necessary for the County to compile data, write programming language or a computer program, or construct a computer report to extract data from the County's electronic records to respond to your PRA Request, which may take additional time as well. If it appears that such work is necessary, we will contact you to advise of any associated costs to determine if you wish the County to proceed with that work.

If you have any questions regarding the above, please feel free to contact me.

Very truly yours,

DANIEL C. CEDERBORG
County Counsel



By Rebekah A. Eropkin, Deputy County
Counsel