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May 14, 2021

Via Certified Mail

Scott McMillan
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RE: Public Records Act Request

Dear Mr. McMillan:

Below is a summary of the records we have produced to you to date:

Request #1	records provided (certifications)
Request #2	no records
Request #3-4	voter registration application needed
Request #5	answer provided
Request #6-13	exemptions claimed (security)
Request #14-18	records provided (cybersecurity plan)
Request #19-25	exemptions claimed (security)
Request #26-35	no records
Request #36-39	voter registration application needed
Request #40-42	no records
Request #43	voter registration application needed
Request #44	records provided (certifications)
Request #45	answer provided
Request #46	no records
Request #47	records provided (certifications)
Request #48	answer provided
Request #49-50	records provided (ballot logs)
Request #51	no records
Request #52-53	rolling production
Request #54	records provided (communications with SOS Office of Voting Systems Technology)
Request #55-63	records provided (Dominion related documents)

Accordingly, pending requests consist of: Requests # 3-4, 36-39, 43, and 52-53.

As to Requests #3-4 and 36-39, please find such voter registration information on the enclosed CD. Pursuant to Elections Code section 2194, the home address, telephone number, email address, precinct number or other number used for voter registration purposes, is confidential and exempt from disclosure. Additionally, unique personal identifiers, including driver's license, social security, and voter registration numbers are exempt from disclosure pursuant to Government Code section 6254.4(c). The names of deceased persons is exempt from disclosure pursuant to Government Code section 6276.06 and Health & Safety Code 102230. The names of persons convicted of felonies is also exempt from disclosure pursuant to Government Code sections 6275-6276.48 and Penal Code sections 11076 and 13202. Such information has been redacted from the voter registration information for the above mentioned reasons. Voter registration information from other counties has been withheld from disclosure because the application to view voter registration information completed by you only gives the Imperial County Registrar of Voters ("ROV") the authority to share voter registration information pertinent to its county.

As to Request #43, after further investigation, the ROV has determined that it does not possess records responsive to this request.

In response to Requests #52-53, please find on the enclosed CD records in possession of the ROV that are responsive to this request. Please note that some records otherwise responsive to this request are not subject to disclosure as they are protected by attorney-client privilege, the work product doctrine, or other applicable privilege or protection pursuant to Government Code section 6254(k) and 6276.04, Evidence Code section 952, 954, 1040, and 1060, Business and Professions Code section 6068, and Code of Civil Procedure sections 2018.010 *et seq.* Additionally, Request #53 seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(c), 6254(aa), 6254.19 and 6255 and Title 2 California Code of Regulations section 19064. Lastly, this request seeks information that is protected by the trade-secret privilege pursuant to Civil Code section 3426.1(d). Some records responsive to this request have been redacted for the above mentioned reasons.

We thank you for your patience and at this time have produced all records within the possession of the ROV. Should you have any questions regarding this response, please contact me at (442) 265-1140.

Sincerely,

ADAM G. CROOK
COUNTY COUNSEL

Faye Winkler
By: Faye Winkler
Deputy County Counsel

Encl.