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January 11, 2021

VIA U.S. MAIL & EMAIL: Scott@mcmillanlaw.us

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

Re: **CPRA: General Election, dated December 18, 2020**
Demand for Inspection or Production of Public Records Numbers 1-63

Dear Mr. McMillan,

Pursuant to California Public Records Act, please find below the Riverside County Registrar of Voters' response to your request dated December 18, 2020. As you may recall, an extension was necessary and timely submitted to you. As such, the County's response was due on or before January 11, 2021.

As you will see below, Riverside County will require special assistance and expertise to extract and compile data that may be responsive to your requests. With respect to those categories of information, please let us know if you would like the County to begin the process of extracting and producing that data. Please note that the County will provide an initial estimate of the cost to extract the data and may require advance payment in connection thereto.

Additionally, some of your requests seek sensitive information security records such that disclosure of the record would reveal vulnerabilities to, or otherwise increase the potential for an attack on, an information technology system of the Riverside County Registrar of Voters and the County of Riverside. As such, the County intends to produce certain policies and procedures that do not reveal vulnerabilities or increase the potential of a cyberattack.

Finally, some of your requests seek confidential voter information. Confidential voter registration information, including voter history, can be applied for and purchased pursuant to Sections 2188 and 2194 of the Election Code, as well as

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California Code of Regulations, title 2, section 19001, et seq., which among other things, require the submittal of an application form as specified in California Code of Regulations, title 2, section 19008. The application and purchase of voter registration data can also be accomplished through the following link: <https://www.voteinfo.net/docs/2014%20Application%20to%20Purchase-View.pdf>

Please find below responses to your request in the same numerical format submitted to the Registrar:

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 1:

The Registrar does not possess an existing record that contains the information being requested. The Registrar may be able to extract this information through data extraction, compilation or programming. Please let us know if you wish to have this data extracted and compiled so that we may estimate the amount of costs associated thereto.

Additionally, the extraction and compilation of data can be prepared and made available for review and duplication once the Registrar receive a completed application for voter registration data and fee pursuant to 2 CCR Section 19001, *et seq.*

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 2:

The Registrar does not possess an existing record that contains the information being requested. The Registrar may be able to extract this information through data extraction, compilation or programming. Please let us know if you wish to have this data extracted and compiled so that we may estimate the amount of costs associated thereto.

Additionally, the extraction and compilation of data can be prepared and made available for review and duplication once the Registrar receive a completed application for voter registration data and fee pursuant to 2 CCR Section 19001, *et seq.*

Demand for Production of Pubic Records No. 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.

Response to Production of Public Records No. 3:

The Registrar does not possess an existing record that contains the information being requested. The Registrar may be able to extract this information through data extraction, compilation or programming. Please let us know if you wish to have this data extracted and compiled so that we may estimate the amount of costs associated thereto.

Additionally, the extraction and compilation of data can be prepared and made available for review and duplication once the Registrar receive a completed application for voter registration data and fee pursuant to 2 CCR Section 19001, *et seq.*

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Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 4:

The Registrar does not possess an existing record that contains the information being requested. The Registrar may be able to extract this information through data extraction, compilation or programming. Please let us know if you wish to have this data extracted and compiled so that we may estimate the amount of costs associated thereto.

Additionally, the extraction and compilation of data can be prepared and made available for review and duplication once the Registrar receive a completed application for voter registration data and fee pursuant to 2 CCR Section 19001, *et seq.*

Demand for Production of Public Records No. 5:

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

Response to Production of Public Records No. 5:

The Registrar has identified responsive document(s) and will produce said document(s).

Demand for Production of Public Records No. 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).

Response for Production of Public Records No. 6:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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).

Response to Production of Public Records No. 7:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 8:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 9:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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).

Response to Production of Public Records No. 10:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information

technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 11:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 12:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 13:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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).

Response to Production of Public Records No. 14:

The Registrar has identified responsive document(s) and will produce general policies and procedures that do not describe potential vulnerabilities or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside.

Additionally, given the overbroad nature of the Request, the Registrar may be in possession of other responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 15:

The Registrar has identified responsive document(s) and will produce general policies and procedures that do not describe potential vulnerabilities or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside.

Additionally, given the overbroad nature of the Request, the Registrar may be in possession of other responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 16:

The Registrar has identified responsive document(s) and will produce general policies and procedures that do not describe potential vulnerabilities or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside.

Additionally, given the overbroad nature of the Request, the Registrar may be in possession of other responsive document(s) that describe potential vulnerabilities,

or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 17:

The Registrar has identified responsive document(s) and will produce general policies and procedures that do not describe potential vulnerabilities or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside.

Additionally, given the overbroad nature of the Request, the Registrar may be in possession of other responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 18:

The Registrar has identified responsive document(s) and will produce general

policies and procedures that do not describe potential vulnerabilities or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside.

Additionally, given the overbroad nature of the Request, the Registrar may be in possession of other responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 19:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 20:

The Registrar has identified responsive document(s) that describe potential

vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 21:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 22:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 23:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 24:

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

Response to Production of Public Records No. 24:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 25:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of

Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 26:

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

Response to Production of Public Records No. 26:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 27:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 28:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 29:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 30:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 31:

The Registrar has identified responsive document(s) that describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside. As such, the Registrar asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and 2 Cal. Code. Reg. § 19064.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 32:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 33:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 34:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 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).

Response to Production of Public Records No. 35:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 36:

The Registrar has identified responsive document(s) and will produce such document(s) for review and duplication once the Registrar receive a completed application for voter registration data and fee pursuant to 2 CCR Section 19001, *et seq.*

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 37:

The Registrar has identified responsive document(s) and will produce such document(s) for review and duplication once the Registrar receive a completed application for voter registration data and fee pursuant to 2 CCR Section 19001, *et seq.*

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 38:

The Registrar has identified responsive document(s) and will produce such document(s) for review and duplication once the Registrar receive a completed application for voter registration data and fee pursuant to 2 CCR Section 19001, *et seq.*

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 39:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 40:

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

Response to Production of Public Records No. 40:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 41:

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

Response to Production of Public Records No. 41:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 42:

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

Response to Production of Public Records No. 42:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 43:

The Registrar does not possess an existing record that contains the information being requested. The Registrar may be able to extract this information through data extraction, compilation or programming. Please let us know if you wish to have this data extracted and compiled so that we may estimate the amount of costs associated thereto.

Additionally, the extraction and compilation of data can be prepared and made available for review and duplication once the Registrar receive a completed application for voter registration data and fee pursuant to 2 CCR Section 19001, *et seq.*

Demand for Production of Public Records No. 44:

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

Response to Production of Public Records No. 44:

The Registrar has identified responsive document(s) and will produce said document(s).

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 45:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 46:

After a reasonable and diligent search, the Registrar has not located responsive records within its custody, control or possession.

Demand for Production of Public Records No. 47:

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

Response to Production of Public Records No. 47:

The Registrar has identified responsive document(s) and will produce said document(s).

Demand for Production of Public Records No. 48:

The number of ballots determined by the county through adjudication for the November 3, 2020 election.

Response to Production of Public Records No. 48:

The Registrar has located responsive documents(s) regarding the number of ballots duplicated and will be produced for duplication and production.

To the extent this request seeks production of the ballots themselves, such records are exempt from disclosure pursuant to Government Code sections 6254(k) and 6255, the California Constitution, article II, Section 7, and Elections Code sections 15370 (after ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened), 15630 (all ballots, whether voted or not, and any other relevant material, may be examined as part of any recount if the

voter filing the declaration requesting the recount so requests) and 17302 (packages containing ballots and identification envelopes shall be kept by the elections official, unopened and unaltered, for six months from the date of the election).

Demand for Production of Public Records No. 49:

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

Response to Production of Public Records No. 49:

The Registrar has located responsive documents(s) regarding the number of ballots duplicated and will be produced for duplication and production.

To the extent this request seeks production of the ballots themselves, such records are exempt from disclosure pursuant to Government Code sections 6254(k) and 6255, the California Constitution, article II, Section 7, and Elections Code sections 15370 (after ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened), 15630 (all ballots, whether voted or not, and any other relevant material, may be examined as part of any recount if the voter filing the declaration requesting the recount so requests) and 17302 (packages containing ballots and identification envelopes shall be kept by the elections official, unopened and unaltered, for six months from the date of the election).

Demand for Production of Public Records No. 50:

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

Response to Production of Public Records No. 50:

The Registrar has located responsive documents(s) regarding the number of ballots duplicated and will be produced for duplication and production.

To the extent this request seeks production of the ballots themselves, such records are exempt from disclosure pursuant to Government Code sections 6254(k) and 6255, the California Constitution, article II, Section 7, and Elections Code sections 15370 (after ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened), 15630 (all ballots, whether voted or not, and any other relevant material, may be examined as part of any recount if the voter filing the declaration requesting the recount so requests) and 17302 (packages containing ballots and identification envelopes shall be kept by the elections official, unopened and unaltered, for six months from the date of the election).

Demand for Production of Public Records No. 51:

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

Response to Production of Public Records No. 51:

The Registrar has located responsive documents(s) regarding the number of ballots duplicated and will be produced for duplication and production.

To the extent this request seeks production of the ballots themselves, such records are exempt from disclosure pursuant to Government Code sections 6254(k) and 6255, the California Constitution, article II, Section 7, and Elections Code sections 15370 (after ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened), 15630 (all ballots, whether voted or not, and any other relevant material, may be examined as part of any recount if the voter filing the declaration requesting the recount so requests) and 17302 (packages containing ballots and identification envelopes shall be kept by the elections official, unopened and unaltered, for six months from the date of the election).

Demand for Production of Public Records No. 52:

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

Response to Production of Public Records No. 52:

The Registrar has located responsive documents(s) regarding the number of ballots duplicated and will be produced for duplication and production.

To the extent this request seeks production of the ballots themselves, such records are exempt from disclosure pursuant to Government Code sections 6254(k) and 6255, the California Constitution, article II, Section 7, and Elections Code sections 15370 (after ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened), 15630 (all ballots, whether voted or not, and any other relevant material, may be examined as part of any recount if the voter filing the declaration requesting the recount so requests) and 17302 (packages containing ballots and identification envelopes shall be kept by the elections official, unopened and unaltered, for six months from the date of the election).

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 53:

The Registrar has identified responsive document(s) and will produce said document(s).

Demand for Production of Public Records No. 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.

Response to Production of Public Records No. 54:

The Registrar has identified responsive document(s) and will produce said document(s).

Demand for Production of Public Records No. 55:

All electronic documents containing the phrase “Image Cast Remote 5.10”.

Response to Production of Public Records No. 55:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Demand for Production of Public Records No. 56:

All electronic documents containing the phrase “Image Cast Remote 5.10A”.

Response to Production of Public Records No. 56:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Demand for Production of Public Records No. 57:

All electronic documents containing the phrase “Image Cast Remote 5.2.”

Response to Production of Public Records No. 57:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Demand for Production of Public Records No. 58:

All electronic documents containing the phrase “Suite 5.10A”.

Response to Production of Public Records No. 58:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Demand for Production of Public Records No. 59:

All electronic documents containing the phrase “Suite 5.2”.

Response to Production of Public Records No. 59:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Demand for Production of Public Records No. 60:

All electronic documents containing the phrase “Suite 5.2”.

Response to Production of Public Records No. 60:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Demand for Production of Public Records No. 61:

All electronic documents containing the phrase “Image Cast Remote 5.10.9.3”.

Response to Production of Public Records No. 61:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the

County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Demand for Production of Public Records No. 62:

All electronic documents containing the phrase “Image Cast ICX 5.10.11.11.”

Response to Production of Public Records No. 62:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Demand for Production of Public Records No. 63:

All electronic documents containing the phrase “Eric Coomer”.

Response to Production of Public Records No. 63:

The Registrar has identified responsive documents that contain the above-identified phrase and will produce said documents that: (1) do not describe potential vulnerabilities, or otherwise increase the potential for an attack on the information technology system associated with the Registrar of Voters and the County of Riverside; (2) reveal information that would violate the official information privilege, the trade secret privilege or the public interest exemption re proprietary business information as set forth in *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762.

Scott A. McMillan, Esq.
The McMillan Law Firm
January 11, 2021
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Please let us know how you would like to proceed with the documents that require data extraction and compilation so that we may begin preparing a cost-estimate for your review.

Should you have any questions or concerns, please do not hesitate to contact the undersigned directly at (951) 955-6300.

Sincerely,

GREGORY P. PRIAMOS
County Counsel

Ronak N. Patel

RONAK N. PATEL
Deputy County Counsel

RNP:dre