

April 8, 2016

The Honorable Jennifer J. Knox Wake County Clerk of Superior Court PO Box 351 Raleigh, NC 27602

Dear Madam:

Pursuant to the North Carolina Public Records Law, G.S. §132-1, et seq., the Voter Integrity Project - NC is requesting copies of certain documents. These documents relate to information potentially obtained by your office regarding the citizenship status of various individuals and your communications about that status with county election officials. To that end, we are specifically seeking the following documents:

- 1) Records of communications from your office to the Wake County Board of Elections pertaining to individuals or circumstances where a person sought disqualification or was disqualified from serving on a jury because that person professed to not have United States citizenship, has died or relocated outside of the jurisdiction.
- 2) Records of communications to your office from the Wake County Board of Elections pertaining to individuals or circumstances where a person sought disqualification or was disqualified from serving on a jury because that person professed to not have United States citizenship, has died or relocated outside of the jurisdiction.
- 3) Records held by your office pertaining to individuals or circumstances where a person sought disqualification or was disqualified from serving on a jury because that person professed to not have United States citizenship, has died or relocated outside of the jurisdiction. These records may include, but are not necessarily limited to, lists of names, forms, communications to your office from those seeking disqualification from jury service based on citizenship status, dispositions of those requests and any data compilations produced by your office about aggregate numbers of individuals excused from jury service because of lacking the requisite citizenship status.
- 4) Records of communications to or from your office to third parties, including but not limited to, the District Attorney for Prosecutorial District 10 or the United States Attorney, pertaining to individuals or circumstances where a person sought disqualification or was disqualified from serving on a jury because that person professed to not have United States citizenship, has died or relocated outside of the jurisdiction.

Form of document: This record request seeks documents whether in paper or electronic form.

Timeframe: This record request seeks documents produced or procured after November 1, 2012. The requestor is amenable to discussing an amendment to this timeframe of the request after an initial review indicates an extraordinary volume of responsive documents.

Limiting Note: This request *does not necessarily seek personally identifying information* which would be exempted from disclosure under statutory exemptions. If documents exist which include personally identifying information which would exempt the document from disclosure, this request is modified to request a redacted version of that document which does not include the specific personally identifying information subject to the statutory exemption.

I also request that all fees for this request be waived. The requested information is in the public interest and will contribute significantly to the public's understanding of the accuracy of voter rolls.

We are amenable to assisting with any preliminary review to help ascertain which documents might be responsive and thereby shrink the burden on your office to respond.

You may respond in paper or, if you find it easier, in electronic form at execdir@voterintegrityproject.com

Sincerely,

Jay N. DeLancy, Director