

Tori B. Coates  
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October 1, 2021

**Via Email: [publicrecords@sos.wa.gov](mailto:publicrecords@sos.wa.gov)**

Public Records Office  
PO BOX 40224  
Olympia, WA 98504-0224

**RE: Washington Public Records Request, RCW 42.56.001 to 42.56.904**

Dear Sir or Madam:

Pursuant to the Washington Public Records Act, please consider this a formal request for documents. The requests for documents are attached as Exhibit A.

In order to help to determine my status to assess fees, you should know that I am an attorney at Jackson Walker LLP representing a defendant in a civil action, and this request is made to gather information related to the civil action and not for a commercial use.

I am willing to pay fees for this request up to a maximum of \$1,000.00. If you estimate that the fees will exceed this limit, please inform me first.

If you expect a significant delay in responding to this request, please contact me with information about when I might expect copies or the ability to inspect the requested records. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. Where possible, please provide responsive material in an electronic format by email. Upon request, I am happy to provide search terms to aid in the agency's search for responsive documents. Please feel free to contact me to discuss production format, timing, and manners in which it may be possible to streamline in an effort to reduce the burden of complying with this public records request.

Thank you for your consideration of this request.

Sincerely,



Tori Blue Coates

## **EXHIBIT A - DOCUMENT REQUESTS**

1. Documents and communications related to the purchase, acquisition, or approval of equipment and/or software provided, maintained or supported by US Dominion, Inc., Dominion Voting Systems, Inc., Dominion Voting Systems Corporation or subsidiaries, Sequoia Voting Systems or Premier Election Solutions f/k/a Diebold Election Systems, Inc. (together, "Dominion") between January 1, 2010 and the present.
2. The entire procurement file for any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal.
3. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal, the complete copy of Dominion's bid proposal (original and as amended/supplemented, including any Best and Final Offers) provided to the agency.
4. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal, all bid evaluation documents of any kind, whether notes, memorandum, or communications, created by or on behalf of the agency or any retained consultants.
5. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal, all documents created by the agency concerning the evaluation and scoring of Dominion's bid proposal, including analysis, recommendations, and reports.
6. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal, all presentations made by Dominion to the agency or its consultants, whether in person or remotely.
7. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal, all communications between the agency and retained consultants regarding evaluation or scoring of Dominion's bid proposal (original and as amended/supplemented, including any Best and Final Offers).
8. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal, all scoring sheets or scoring documents of any kind created by the agency or any retained consultant regarding Dominion's bid proposal (original and as amended/supplemented, including any Best and Final Offers).
9. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion

submitted a bid proposal, all meeting agendas, minutes, and notes generated during meetings concerning the evaluation, recommendation, or decision to award a contract regarding Dominion's bid proposal (original and as amended/supplemented, including any Best and Final Offers).

10. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal, all internal communications and communications with Dominion regarding Dominion's bid proposal (original and as amended/supplemented, including any Best and Final Offers).

11. For any solicitation issued for the procurement of electronic voting machines and/or software services of any kind between January 1, 2010 and the present in which Dominion submitted a bid proposal and was awarded a contract, a copy of the resulting contract(s) and any drafts exchanged between the agency and Dominion.

12. All communications to or from Dominion between January 1, 2010 and the present.

13. Documents and communications related to testing, analysis, certification, decertification or refusal to certify, accept or utilize equipment and/or software provided, maintained or supported by Dominion.

14. Documents and communications related to pre-election or post-election reporting or analysis of equipment and/or software provided, maintained or supported by Dominion.

15. Documents and communications related to campaign contributions, financial contributions or other things of value received from Dominion, including any officer, director, investor, representative or agent of Dominion.

16. Documents and communications related to any criticisms of, or concerns about, the use of equipment and/or software provided, maintained or supported by Dominion.

17. Documents and communications related to the marketing or sale of equipment and/or software provided, maintained or supported by Dominion.

18. Documents and communications from Dominion's competitors, including Election Systems & Software, Inc., Smartmatic USA Corporation, Hart Intercivic, Inc. or any other voting technology company, related to equipment and/or software provided, maintained or supported by Dominion.