

# **EXHIBIT E**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI-DIVISION

Case No. 1:17-CV-22568-CIV-COOKE/Goodman

ARTHENIA JOYNER, et al.

Plaintiff,

vs.  
PRESIDENTIAL ADVISORY COMMISSION  
ON ELECTION INTEGRITY, et al.

Defendants,

\_\_\_\_\_ /

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO STATE DEFENDANTS**

Plaintiffs Joyner, et al., under Rule 34, request that Defendant Ken Detzner, in his Official Capacity as Florida Secretary of State, to respond to this second request, within 30 days of service, and permit Plaintiff to inspect and copy each of the following documents and things:

**Definitions**

A. "You," "Your," "Yours" and/or "Florida Secretary of State" refers to Defendant Ken Detzner, in his Official Capacity as Florida Secretary of State, any of its departments, offices, agencies, affiliates, or any other entities over which it has any control, including all officers, agents, employees, authorized representatives, accountants and attorneys who presently serve in such capacities or who so served at any time.

B. **“Commission on Election Integrity”** refers to the Presidential Advisory Commission on Election Integrity, its chairs – Kris Kobach and Michael Pence, any of its members (current or past), any of its representatives, employees, agents, accountants and attorneys who presently serve in such capacities or who so served at any time.

C. **“Rick Scott or “Florida Governor’s Office”** refers to Florida Governor Rick Scott, the Office of the Florida Governor, any of its departments, offices, agencies, affiliates, or any other entities over which it has any control, including all officers, agents, employees, authorized representatives, accountants and attorneys who presently serve in such capacities or who so served at any time.

D. **“Florida Department or Agency”** refers to any office, department, division, official, or other entity in the Florida Government.

E. **“Elected Official”** means any elected official of the Florida, the United States or any other state, any of their agents, representatives, or employees.

F. **“Trump Administration” or “White House”** refers to the Executive Office of the President of the United States, the President, all Administration Officials, employees, agents, authorized representatives, accountants and attorneys who presently serve in such capacities or who so served at any time.

G. **“Server”** the server, computer, or other device where the Commission has represented it is storing Voter Data that States submit.

H. **“Document” or “Documents”** refers to any and all originals documents, letters, memorandum, correspondence, faxes, emails, statements, records, logs, drafts, unsigned copies, marked copies, written, recorded or graphic matter, however produced or reproduced, and shall

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include without limitation originals, drafts, drawings, graphics, charts, working papers, writings, hand writing, typewriting, printing, Photostatting, photographing, mechanical, magnetic or electronic recording, and every other means of recording, upon any tangible thing or medium, any form of communication or representation, including letters, words, pictures, sounds or symbols or combinations thereof and information stored in for computers, databases, data processing machines, and other data compilations.

H. **“Predecessor”** means any business firm, whether or not incorporated, which had all or some of its assets purchased by the referenced corporation or came to be acquired by the referenced corporation, whether by a merger, consolidation or otherwise.

I. **“Successor”** means any business firm, whether or not incorporated, which purchased all or some of the referenced corporation's assets or which acquired the referenced corporation or any of its predecessors, whether by merger, consolidation, or otherwise.

Documents Requested.

### **Documents Requested**

#### **Documents on the Presidential Commission on Election Integrity**

1. All correspondence, emails, memos and similar documents evidencing any communications with the Commission on Election Integrity.
2. All correspondence, emails, memos and similar documents evidencing any communications with the Rick Scott that have anything to do with the Commission on Election Integrity.

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3. All correspondence, emails, memos and similar documents evidencing any communications with any Florida Department or Agency that have anything to do with the Commission on Election Integrity.
4. All correspondence, emails, memos and similar documents evidencing any communications with any Elected Official that have anything to do with the Commission on Election Integrity.
5. All correspondence, emails, memos and similar documents evidencing any communications with the Trump Administration that have anything to do with the Commission on Election Integrity.
6. All correspondence, emails, memos and similar documents evidencing any communications with the White House that have anything to do with the Commission on Election Integrity.
7. All correspondence, emails, memos and similar documents evidencing any communications with anyone that have anything to do with the Commission on Election Integrity.

**Documents Re Authority to Release Florida Voter Data**

8. All authorizations, orders, and similar documents authorizing the Florida Secretary of State to share or transmit Florida Voter Data to the Commission.
9. All authorizations, orders, and similar documents authorizing the Florida Secretary of State to share or transmit Florida Voter Data to the White House.

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10. All memos, studies, reports, analyses correspondence and similar documents that have anything to do with justifying the Florida Secretary of State to share Florida Voter Data with the White House or the Commission.

**Documents on the Server's Security and Integrity for Storing Voter Data**

11. All correspondence, emails, memos, reports and similar documents evidencing any communications with the Commission on Election Integrity that have anything to do with the Server's integrity or security.
12. All correspondence, emails, memos, reports, and similar documents evidencing any communications with Rick Scott or the Florida Governor's Office that have anything to do with Server's integrity or security.
13. All correspondence, emails, memos, reports, and similar documents evidencing any communications with any Florida Department or Agency that have anything to do with Server's integrity or security.
14. All correspondence, emails, memos, reports, and similar documents evidencing any communications with any Elected Official that have anything to do with Server's integrity or security.
15. All correspondence, emails, memos and similar documents evidencing any communications with the White House or Trump Administration that have anything to do with Server's integrity or security.

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16. All correspondence, emails, memos, reports, and similar documents evidencing any communications with anyone that have anything to do with Server's integrity or security.
17. All memos, memorandum, analyses, reports and similar Documents that have anything to do with the Server's integrity or security.
18. All memos, memorandum, analyses, reports and similar Documents that have anything to do with the Server's integrity or security.

**Documents Evidencing Voter Fraud**

19. All memos, studies, analyses, reports, correspondence and similar documents that evidence any wide spread voter fraud in Florida.
20. All memos, studies, analyses, reports, correspondence and similar documents that evidence any kind voter fraud in Florida that the Florida Secretary of State considers significant.
21. All correspondence, emails, memos, reports, and similar documents evidencing any communications with the Commission on Election Integrity that have anything to do with purported voter fraud in Florida.
22. All correspondence, emails, memos and similar documents evidencing any communications with Rick Scott or the Florida Governor's Office that have anything to do with purported voter fraud in Florida or in the United States.

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23. All correspondence, emails, memos, reports, and similar documents evidencing any communications with the any Florida Department or Agency that have anything to do with purported voter fraud in Florida.
24. All correspondence, emails, memos, reports, and similar documents evidencing any communications with the any Elected Official that have anything to do with purported voter fraud in Florida.
25. All correspondence, emails, memos, reports, and similar documents evidencing any communications with the Commission on Election Integrity that that have anything to do with purported voter fraud anywhere in the United States.
26. All correspondence, emails, memos and similar documents evidencing any communications with the Trump Administration or White House that have anything to do with purported voter fraud in Florida.
27. All correspondence, emails, memos and similar documents evidencing any communications with the Trump Administration or White House that have anything to do with purported voter fraud anywhere in the United States.
28. All correspondence, emails, memos and similar documents evidencing any communications with anyone that have anything to do with purported voter fraud in Florida.
29. All correspondence, emails, memos and similar documents evidencing any communications with anyone that have anything to do with purported voter fraud anywhere in the United States.

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30. All memos, studies, analyses, reports, correspondence and similar documents provided by the Commission that evidence any purported voter fraud in Florida.
31. All memos, studies, analyses, reports, correspondence and similar documents provided by the Commission that evidence any purported voter fraud anywhere in the United States.

**Documents on Voter Suppression**

32. All memos, studies, analyses, reports, correspondence and similar documents that having anything to do with suppressing voter turnout in Florida.
33. All memos, studies, analyses, reports, correspondence and similar documents that having anything to do with suppressing voter turnout anywhere in the United States.
34. All correspondence, emails, memos and similar documents evidencing any communications with the Commission on Election Integrity that have anything to do with suppressing voter turnout in Florida.
35. All correspondence, emails, memos and similar documents evidencing any communications with the Commission on Election Integrity that have anything to do with suppressing voter turnout anywhere in the United States.
36. All correspondence, emails, memos and similar documents evidencing any communications with the Rick Scott or the Florida Governor's Office that have anything to do with suppressing voter turnout in Florida.

37. All correspondence, emails, memos and similar documents evidencing any communications with the Rick Scott or the Florida Governor's Office that have anything to do with suppressing voter turnout anywhere in the United States.
38. All correspondence, emails, memos and similar documents evidencing any communications with any Florida Department or Agency that have anything to do with suppressing voter turnout in Florida.
39. All correspondence, emails, memos and similar documents evidencing any communications with any Florida Department or Agency that have anything to do with suppressing voter turnout anywhere in the United States
40. All correspondence, emails, memos and similar documents evidencing any communications with the Elected Official that have anything to do with suppressing voter turnout in Florida.
41. All correspondence, emails, memos and similar documents evidencing any communications with the Elected Official that have anything to do with suppressing voter turnout anywhere in the United States.
42. All correspondence, emails, memos and similar documents evidencing any communications with the White House or Trump Administration that have anything to do with suppressing voter turnout in Florida.
43. All correspondence, emails, memos and similar documents evidencing any communications with the White House or Trump Administration that have anything to do with suppressing voter turnout anywhere in the United States.

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- 44. All correspondence, emails, memos and similar documents evidencing any communications with anyone that have anything to do with suppressing voter turnout in Florida.
- 45. All correspondence, emails, memos and similar documents evidencing any communications with anyone that have anything to do with suppressing voter turnout anywhere in the United States.

**Other Documents**

- 46. All requests and similar documents for voter data from the Commission, the White House, or the Trump Administration.
- 47. All correspondence, emails, memos, reports, analyses and similar documents on the Interstate Crosscheck System.
- 48. All correspondence, emails, memos, reports, analyses and similar documents regarding any computer program that the Commission is running on Florida Voter Data.
- 49. All correspondence, emails, memos, reports, analyses and similar documents regarding any computer program that the Commission is running on any Voter Data submitted by any state.

Dated: November 10, 2017

S/ H.K. Skip Pita

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 10, 2017, that the foregoing document is being served this day on all counsel of record identified on the attached service list in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner.

/s/ H.K. Skip Pita

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