

# EXHIBIT A



## Standard Right-to-Know Law Request Form

*Good communication is vital in the RTKL process. Complete this form thoroughly and retain a copy; it may be required if an appeal is filed. You have 15 business days to appeal after a request is denied or deemed denied.*

**SUBMITTED TO AGENCY NAME:** Fulton County (Attn: AORO)

Date of Request: July 30, 2024 Submitted via:  X Email  U.S. Mail  Fax  In Person

**PERSON MAKING REQUEST:**

Name: Susan Greenhalgh Company (if applicable): Free Speech For People

Mailing Address: 48 N Pleasant St,

City: Amherst State: MA Zip: 01002

Email: susan@freespeechforpeople.org

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

How do you prefer to be contacted if the agency has questions? Telephone  X Email  U.S. Mail

**RECORDS REQUESTED:** *Be clear and concise. Provide as much specific detail as possible, ideally including subject matter, time frame, and type of record or party names. RTKL requests should seek records, not ask questions. Requesters are not required to explain why the records are sought or the intended use of the records unless otherwise required by law. Use additional pages if necessary.*

For the time period September 1, 2020 through the present:

All communications (including letters, emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, instant messages, and social media communications) involving Fulton County Commissioners including Randy Bunch, Stuart Ulsh, and Paula Shives, Fulton County Elections Director Patti Hess, Fulton County Technology Director Eldon Martin, Senator Doug Mastriano, Senator Judy Ward, Senator Cris Dush, and Representative Jesse Topper, concerning the topics listed below.

1. All communications with anyone communicating from an email address ending in @eac.gov.

2. All communications with Rudy Giuliani, Sidney Powell, Mike Lindell, MyPillow, Patrick Byrne, Fox News, Newsmax, One America News Network (OAN), Defending the Republic, Powell P.C., or any of their officers, employees, agents, trust, attorneys, accountant, representatives, or other person/s purporting to work on their behalf.



3. All communications with anyone from an email address ending in @waketsi.com, @alliedspecialops.us, @cyberninjas.com, @federalappeals.com, @giulianisecurity.com, @giulianipartners.com, @gdcillc.com, @foxnews.com, @newsmax.com, and @oann.com.
4. All documents and communications relating to audits, reports, or investigations of the 2020 election, including by Wake TSI, Pro V&V, SLI Compliance, Allied Security Operations Group, Alex Halderman, or any state or local agencies.
5. All documents and communications concerning policies and procedures for ensuring the accuracy of voting technology and machines for the 2020 election.
6. All documents and communications, including but not limited to voicemail messages, concerning threats or harassment of local election officials.
7. All documents and communications with or relating to Cyber Ninjas, Doug Logan, Wake Technology Services, Inc, Allied Security Operations Group (ASOG), Conan Hayes, Russell Ramsland, Todd Sanders, and Joshua Merritt.
8. All documents and communications from November 3, 2020 to the present with constituents that concern or reference Dominion and/or the 2020 election, and any internal correspondence about or relating to these constituent communications.
9. All documents and communications with anyone who works for Election Systems & Software (ES&S), Hart InterCivic, or Clear Ballot.

These records have all been adjudicated as subject to Pennsylvania's Right to Know Laws by the Office of Open Records, AP 2022-1542, with the minor exception for the presence of personal identifying information which must be redacted. The Office of Open Records has determined that all these records must be produced and may not be withheld.

We request the subject records to be produced to us un-redacted and in electronic format where possible. Free Speech For People is a not-for-profit organization incorporated under the laws of the State of Massachusetts. Our principle purpose in this request is to access and disseminate information regarding the legal rights of the general public as they relate to elections. We request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the integrity of elections. Should you nonetheless impose a reasonable search, preparation or reproduction fee, not to exceed the actual costs incurred by the Fulton County Board of Elections please contact me prior to production and with the required accounting. If there are any fees for searching or copying these records,

*NOTE: In most cases, a completed RTKL request form is a public record.*

Form updated Feb. 3, 2020

More information about the RTKL is available at <https://www.openrecords.pa.gov>



please inform me if the cost will exceed \$100. This information is not being sought for commercial purposes.

**DO YOU WANT COPIES?**  Yes, printed copies (*default if none are checked*)  
 Yes, electronic copies preferred if available  
 No, in-person inspection of records preferred (*may request copies later*)

Do you want [certified copies](#)?  Yes (*may be subject to additional costs*)  No  
*RTKL requests may require payment or prepayment of fees. See the [Official RTKL Fee Schedule](#) for more details.*

**Please notify me if fees associated with this request will be more than  \$100 (or)  \$\_\_\_\_\_.**

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**ITEMS BELOW THIS LINE FOR AGENCY USE ONLY**

Tracking: \_\_\_\_\_ Date Received: \_\_\_\_\_ Response Due (5 bus. days): \_\_\_\_\_

30-Day Ext.?  Yes  No (If Yes, Final Due Date: \_\_\_\_\_) Actual Response Date: \_\_\_\_\_

Request was:  Granted  Partially Granted & Denied  Denied Cost to Requester: \$\_\_\_\_\_

Appropriate third parties notified and given an opportunity to object to the release of requested records.



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### PERSON MAKING REQUEST:

Name: Susan Greenhalgh Company (if applicable): Free Speech For People

Mailing Address: 48 N Pleasant St,

City: Amherst State: MA Zip: 01002

Email: susan@freespeechforpeople.org

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

How do you prefer to be contacted if the agency has questions? Telephone  X Email  U.S. Mail

**RECORDS REQUESTED:** *Be clear and concise. Provide as much specific detail as possible, ideally including subject matter, time frame, and type of record or party names. RTKL requests should seek records, not ask questions. Requesters are not required to explain why the records are sought or the intended use of the records unless otherwise required by law. Use additional pages if necessary.*

We request a copy of the Right to Know settlement agreement entered into between Fulton County and Florence Chen and Dominion Voting Systems in civil action 204 of 2022-C in the Court of Common Pleas that was approved at the January 24, 2023 commissioners meeting.

We request the subject records to be produced to us un-redacted and in electronic format where possible. Free Speech For People is a not-for-profit organization incorporated under the laws of the State of Massachusetts. Our principle purpose in this request is to access and disseminate information regarding the legal rights of the general public as they relate to elections. We request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the integrity of elections. Should you nonetheless impose a reasonable search, preparation or reproduction fee, not to exceed the actual costs incurred by the Fulton County Board of Elections please contact me prior to production and with the required accounting. If there are any fees for searching or copying these records,



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# EXHIBIT B



## Standard Right-to-Know Law Request Form

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**SUBMITTED TO AGENCY NAME:** Fulton County (Attn: AORO)

Date of Request: Aug. 5, 2024 Submitted via:  Email  U.S. Mail  Fax  In Person

**PERSON MAKING REQUEST:**

Name: Susan Greenhalgh Company (if applicable): Free Speech For People

Mailing Address: 48 N Pleasant St,

City: Amherst State: MA Zip: 01002

Email: susan@freespeechforpeople.org

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

How do you prefer to be contacted if the agency has questions? Telephone  Email  U.S. Mail

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For the time period September 1, 2020 through April 25, 2022:

All communications (including letters, emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, instant messages, and social media communications) involving Fulton County Commissioners including Randy Bunch, Stuart Ulsh, and Paula Shives, Fulton County Elections Director Patti Hess, Fulton County Technology Director Eldon Martin, Senator Doug Mastriano, Senator Judy Ward, Senator Cris Dush, and Representative Jesse Topper, concerning the topics listed below.

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3. All communications with anyone from an email address ending in @waketsi.com, @alliedspecialops.us, @cyberninjas.com, @federalappeals.com, @giulianisecurity.com, @giulianipartners.com, @gdcillc.com, @foxnews.com, @newsmax.com, and @oann.com.
4. All documents and communications relating to audits, reports, or investigations of the 2020 election, including by Wake TSI, Pro V&V, SLI Compliance, Allied Security Operations Group, Alex Halderman, or any state or local agencies.
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Form updated Feb. 3, 2020

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**pennsylvania**  
OFFICE OF OPEN RECORDS

please inform me if the cost will exceed \$100. This information is not being sought for commercial purposes.

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30-Day Ext.?  Yes  No (If Yes, Final Due Date: \_\_\_\_\_) Actual Response Date: \_\_\_\_\_

Request was:  Granted  Partially Granted & Denied  Denied Cost to Requester: \$\_\_\_\_\_

Appropriate third parties notified and given an opportunity to object to the release of requested records.

# EXHIBIT C



Susan Greenhalgh &lt;segreenhalgh@gmail.com&gt;

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## RTK request

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Susan Greenhalgh &lt;susan@freespeechforpeople.org&gt;

Mon, Aug 12, 2024 at 4:34 PM

To: Stacey Golden &lt;sgolden@co.fulton.pa.us&gt;

Thank you for checking, we are not withdrawing the first request but recognize there will be duplicative documents and will not request more than one copy be produced of each responsive document.

Best regards,

Susan Greenhalgh (she/her)

Senior Advisor on Election Security

Free Speech For People

917 796 8782 (cell)

[www.freespeechforpeople.org](http://www.freespeechforpeople.org)

[Blog](#) | [Press](#)

On Mon, Aug 12, 2024 at 4:05 PM Stacey Golden <sgolden@co.fulton.pa.us> wrote:

Susan,

This Right to Know request is identical to the one you sent marked July 30<sup>th</sup> with the only difference being that you wanted records from September 1, 2020 through the present on the July 30<sup>th</sup> request and this current request is for records from September 1, 2020 through April 25, 2022 on the August 5<sup>th</sup> one. Do you wish to withdraw one?

Thanks,

*Stacey M. Golden*

Chief Clerk

Right-To-Know-Officer

County of Fulton

116 West Market Street, Suite 203

McConnellsburg, PA 17233

Phone: 717-485-3691

Fax: 717-485-9411

[sgolden@co.fulton.pa.us](mailto:sgolden@co.fulton.pa.us)



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**From:** Susan Greenhalgh <[susan@freespeechforpeople.org](mailto:susan@freespeechforpeople.org)>  
**Sent:** Monday, August 5, 2024 2:48 PM  
**To:** Stacey Golden <[sgolden@co.fulton.pa.us](mailto:sgolden@co.fulton.pa.us)>  
**Subject:** RTK request

[EXTERNAL MESSAGE - EXERCISE CAUTION]

Please find our RTK request attached.

Susan Greenhalgh (she/her)

Senior Advisor on Election Security

Free Speech For People

917 796 8782 (cell)

[www.freespeechforpeople.org](http://www.freespeechforpeople.org)

Blog|[Press](#)

# EXHIBIT D

## **FINAL DETERMINATION**

DATE ISSUED AND MAILED: September 4, 2024

IN RE: *Susan Greenhalgh and Free Speech For People v. Fulton County*, OOR Dkt. AP 2024-2098  
(Consolidated appeal of OOR Dkt. Nos. AP 2024-2098 and 2024-2099)

On July 30, 2024 and August 5, 2024, Susan Greenhalgh and Free Speech For People (collectively “Requester”) submitted requests (“Requests”) to Fulton County (“County”) pursuant to the Right-to-Know Law (“RTKL”), 65 P.S. §§ 67.101 *et seq.* The County did not respond within five business days of receiving the Requests and the Requests were, therefore, deemed denied on August 6, 2024 and on August 12, 2024, respectively. 65 P.S. § 67.901. On August 12, 2024, the Requester appealed to the Office of Open Records (“OOR”).<sup>1</sup>

Local agencies have the burden of proving that records are exempt from access. 65 P.S. § 67.708(a)(1). Here, the County did not comply with the RTKL by timely responding to the Request, nor did the County participate on appeal by submitting legal argument or evidence in support of withholding records.<sup>2</sup> Accordingly, the County did not meet its burden of proof under the RTKL. 65 P.S. § 67.305.

For this reason, the appeal is **granted**, the County is required to provide the requested records to the Requester within thirty days, or, in the alternative, a sworn affidavit or a statement made under the penalty of perjury demonstrating that the records do not exist. Within thirty days of the mailing date of this Final Determination, either party may appeal or petition for review with the Fulton County Court of Common Pleas. 65 P.S. § 67.1301(a). All parties must be served with notice of the appeal. The OOR also shall be served notice and have an opportunity to respond according to court rules as per 65 P.S. § 67.1303, but as the quasi-judicial tribunal adjudicating this matter, the OOR is not a proper party to any appeal and should not be named as a party.<sup>3</sup> All documents or communications following the issuance of this Final Determination shall be sent to [oor-postfd@pa.gov](mailto:oor-postfd@pa.gov). This Final Determination shall be placed on the website at: <http://openrecords.pa.gov>.

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<sup>1</sup> Because the appeals involve the same agency, requester, and similar requests, the appeals are hereby consolidated into OOR Dkt. AP 2024-2098. *See* 65 P.S. § 1102(b)(3) (stating that “the appeals officer shall rule on procedural matters on the basis of justice, fairness, and the expeditious resolution of the dispute”).

<sup>2</sup> Having received no submissions from the County, the OOR extended the submission period from August 22, 2024 until August 26, 2024. 65 P.S. § 67.1102(a)(1) (vesting appeals officers with the discretion to establish a schedule for the parties to submit evidence and argument.). Having received no submissions from the County after the extended submission period, OOR administrative contacted the County via telephone on August 27, 2024. On August 30, 2024, the County submitted what appeared to be an untimely thirty-day extension notice, dated August 30, 2024. *See* 65 P.S. § 67.902(b). On September 3, 2024, the OOR requested clarification from the County regarding the purported extension notice and its legal position. To date, no response has been received.

<sup>3</sup> *Padgett v. Pa. State Police*, 73 A.3d 644, 648 n.5 (Pa. Commw. Ct. 2013).

Issued by:

*/s/ Erika Similo*

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ERIKA SIMILO  
APPEALS OFFICER

Sent via OOR portal to: Susan Greenhalgh; Stacey Golden



# EXHIBIT E



Snyder, Marni Jo (Attorney) <marni@snyderlawyer.com>

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## OOR re voting machines

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Snyder, Marni Jo (Attorney) <marni@snyderlawyer.com>

Wed, Aug 14, 2024 at 10:00 AM

To: stein@co.fulton.pa.us

Mr. Stein,

I represent Free Speech for People. We submitted an RTK request and received no response (outside of a read receipt) and then an OOR appeal. I would like to discuss the matter with you at your earliest convenience. Of course, this is all happening while I am on vacation, but if you can excuse toddler noises in the background, I can answer this week. If it is too disruptive, then I am back on August 19.

I really look forward to hearing from you.

Sincerely,

Marni Jo Snyder

--

Marni Jo Snyder, Esq.  
Law Offices of M.J. Snyder, LLC  
1500 Walnut, 7th Floor  
Philadelphia, PA 19102  
215.515.3360 (Office)  
215.430.3201 (Mobile)  
215.376.6981 (Fax)

CONFIDENTIAL: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

# EXHIBIT F



Snyder, Marni Jo (Attorney) <marni@snyderlawyer.com>

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## Fulton Co RTK request and OOR appeal

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Snyder, Marni Jo (Attorney) <marni@snyderlawyer.com>

Wed, Aug 21, 2024 at 6:09 PM

To: dsslaw@dsslawyers.com

Mr. Stein,

I represent Free Speech for People. I want to discuss RTK Request and OOR matters with you at your earliest convenience.

I look forward to hearing from you.

Sincerely,

Marni Jo Snyder

--

Marni Jo Snyder, Esq.  
Law Offices of M.J. Snyder, LLC  
1500 Walnut, 7th Floor  
Philadelphia, PA 19102  
215.515.3360 (Office)  
215.430.3201 (Mobile)  
215.376.6981 (Fax)

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