

**ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE**

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May 27, 2021

**SENT BY EMAIL ONLY**

Kelley Potenza  
[REDACTED]

Re: May 20, 2020 Right to Know Request for Information Related to  
Volunteers for the Windham Audit

We received your May 20, 2021 request for documents under New Hampshire RSA 91-A for the following in regard to the May 10, 2021 email from Patricia Piecuch beginning "Good Afternoon Election Officials":

1. The email list Patricia Piecuch used to bulk email these public election officials.
2. The complete list the email was generated from.
3. Any responses to Patricia Piecuch from said email.
4. All responses to nhvotes@sos.nh.gov.
5. Any responses to date from the above mentioned: "Good Afternoon Election Officials," to the NH Secretary of State or NH Attorney General's Office.
6. The original email or letter from the NH Secretary of State's Office directing Patricia D. Piecuch to email the list of election officials.
7. Any documents, from any vendor, the NH SoS Office or NH AG's Office outlining the proposed activities to be conducted by the election officials.
8. All emails regarding this bulk email: "Good Afternoon Election Officials" from NH SoS employee Orville Fitch and NH AG employee Nicholas Chong Yen.
9. All emails sent by the offices of the Attorney General or Secretary of State to all recipients who responded to Ms. Piecuch's email of May 10, 2021.
10. The complete process and explanation of how all Pembroke volunteers were selected.
11. The list of all the volunteers that have worked in Pembroke since the SB 43 audit began. Each day/date should have its own list of volunteers for that day/date and each individual should have their party affiliation listed next to their name (Democrat, Republican, or Independent.) This request applies to all SB 43 audit days to include the ones that have not occurred as yet.

12. The list of all guests and attendees in Pembroke since the SB 43 audit began to include all employees from the Attorney General or Secretary of State offices. This request applies to all SB 43 audit days to include the ones that have not occurred as yet.

Please be advised that due to the time required to review the emails of all Department of Justice ("DOJ") and Secretary of State employees with regard to the above requests for emails and documents sent via email, together with the fact that the individuals with some of this information are still actively in attendance at the ongoing audit, we will not be able to respond to your request within 5 business days as additional time is required to locate the responsive records and to review to determine whether any information is exempt from disclosure.

In order to respond as quickly as possible, we will provide documents on a rolling production basis where we release groups of documents as they become available rather than holding all of the documents for one complete disclosure. We expect to have the records request completed no later than June 23, 2021.

Also, please note that a state agency is only required to produce documents that currently exist and that are in its physical possession. There is no requirement under RSA 91-A to create documents that do not currently exist or to reformat document as requested.

Below are the currently available responses to specific Requests:

Request 11: The list of volunteers for each Audit day can be found on the DOJ website at: <https://www.doj.nh.gov/sb43/index.htm>

Request 12: The daily attendance list for each day of the Audit is attached. The records have been redacted based RSA 91-A:5, IV (records that would be an invasion privacy that is not outweighed by any public interest in disclosure). Personal email addresses and telephone numbers have been redacted. There is no single document that contains the names of DOJ personnel present during each day of the Audit. However, in response to your request, and without waiving the statutory limitation on creating responsive documents, the DOJ personnel in attendance throughout the Audit are as follows: Anne Edwards, Nicholas Chong Yen, Richard Tracy, Kate Giaquinto, and Jill Tekin. James Boffetti was in attendance on May 20-22, 2021. DOJ Investigators are assigned for each day as the enclosed schedule shows.

As explained above, all other responsive records will be provided on a rolling basis no later than June 23, 2021.

Sincerely,  
/s/ Anne Edwards  
Anne. M. Edwards  
Associate Attorney General