

**ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE**

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CONCORD, NEW HAMPSHIRE 03301-6397

JOHN M. FORMELLA  
ATTORNEY GENERAL



JANE E. YOUNG  
DEPUTY ATTORNEY GENERAL

June 14, 2021

**Sent via email only:**

Albert Todd

[REDACTED]

Re: June 7, 2021, Right to Know re Windham Audit (2021149508)

Dear Mr. Todd

We received your June 7, 2021 right-to-know request for documents related to the Windham Audit. The response being provided in this letter is on behalf of the Attorney General's Office and includes all documents in the possession of our Office.

Your first request is:

"All records, no matter what form, including but not limited to, printed documents, electronic documents, e-mails, governmental e-mails or any other form of records regarding all communication between the Attorney General's Office, Harri Hursti, Mark Lindeman, Philip Stark and Verified Voting for the period from JANUARY 1, 2021 to PRESENT (June 7, 2021)."

**Response:** Our Office has documents that constitute communications between us, Harri Hursti, Mark Lindeman, Philip Stark, and Verified Voting. Those documents are being collected and reviewed to determine if they are responsive.

The collection and review of those documents will take more than 5 business days. Our Office will provide those documents to you by July 15, 2021. As documents become available, we will provide, on a rolling basis, documents that are responsive to your request.

Your second request is:

"All records, no matter what form, including but not limited to, printed documents, electronic documents, e-mails, governmental e-mails or any other form of records regarding all communications between the Attorney General's

Office and the Governor Chris Sununu regarding the SB43 audit for the period from JANUARY 1, 2021 to PRESENT (June 7, 2021).”

**Response:** We have two emails between our Office and Governor Chris Sununu’s Office that are responsive to your request. Those documents are not being produced as they are not subject to disclosure under RSA 91-A or the New Hampshire Constitution Part 1, Article 8, based on the executive privilege and the attorney-client privilege. *See Chambers v. Gregg*, 135 N.H. 478 (1992) and *Professional Fire Fighters of New Hampshire v. New Hampshire Local Government Center*, 163 N.H. 613 (2012)

Your third request is:

“All records, no matter what form, including but not limited to, printed documents, electronic documents, e-mails, governmental e-mails or any other form of records regarding all communications between the Attorney General’s Office, Jeff Silvestro and LHS Associates from JANUARY 1, 2021 to PRESENT (June 7, 2021).”

**Response:** The Attorney General’s Office has documents that constitute communications between our Office, Jeff Silvestro, and LHS Associates. Those documents are being collected and reviewed to determine if they are responsive.

The collection and review of those documents will take more than 5 business days. Our Office will provide those documents to you by July 15, 2021. As documents become available, we will provide, on a rolling basis, documents that are responsive to your request.

Sincerely,

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