

From: [Tom and Donna Lenahan](#)
To: elections@sos.nh.gov; [DOJ: Attorney General](#); vitalrecords@sos.nh.gov
Subject: Forensic Audit Now
Date: Sunday, June 13, 2021 10:31:05 AM

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Attention Secretary of State: William Gardner elections@sos.nh.gov
Attorney General: John Formella attorneygeneral@doj.nh.gov

Hello New Hampshire,

Pursuant to the Right to Know Law (RSA. 91-A), I am requesting public access, within 5 business days (on or before June 14, 2021), to the governmental records reasonably described as follows:

1. I request a detailed timeline of exactly any and all involvement of Harri Hursti and/or Nordic Innovation Labs regarding New Hampshire's Accuvote machines. Please also send all email or text message communications between the Secretary of State's office and the AG's office involved with Harri Hursti and/or Nordic Innovation Labs. Please send a thorough detailed timeline of any involvement of Mr. Hursti and our Accuvote machines. I am requesting information dated 2010 through 2021.
2. In 2016, James O'Keefe was served a subpoena from Richard (Dick) Tracy. Pursuant to article 91A, I request any and all the information James O'Keefe supplied to the NH's AG office as well as the NH Secretary of State's office for this subpoena.
3. I request any and all invoices paid to LHS paid by the State of NH for the last 7 years.
4. In 2010 all NH machines received a "firmware update." Please send any and all information pertaining to this update. Also who actually did the updates. Who performed the updates?
5. There are five towns whose town clerks state either the SOS has their machine tapes from the 2020 election or they are locked in their ballot boxes. Bud Fitch sent me an email last week basically stating I would have to go through the court process to receive this public information. Does it sound logical knowing a judge would obviously grant me access to this PUBLIC INFORMATION that I need to spend my own money on obtaining a lawyer? I'm hoping we can receive this information lawfully without wasting hard earned tax paying money. The five towns are as follows:
 - A. Hollis
 - B. New Ipswich
 - C. Rindge
 - D. Westmoreland
 - E. Wilton
 - F. Milford
6. According to Harri Hursti the reason why he is not being supervised while continuing the audit is due to copyright infringements? Please provide who released those copyrights to Harri and what the process is for us to receive released copy rights as well. Who has the exclusive access to these copyrights?
7. I request any non-disclosure agreements between Harri Hursti and or Nordic Innovation Labs and the State of New Hampshire and its affiliates and Diebold Premier.
8. Who prints New Hampshire's Ballots? Please list whether hand counting towns (NH State Prison?) ballots are printed independently from machine ballot towns? Please also list whether absentee ballots are printed independently of walk-in ballots? Please list any and all companies that are involved in way with processing our ballots.

9. Please provide the most current manual for the NH Accuvote machines.

10. Logs of chain of custody logs for Windhams machines memory cards as well as the chain of custody records for the town of Windaham ballots.

11. A copy of the “exact electronic record of the data written to each memory card” used in Windham for the November 3, 2020 election per RSA 656:42 VIII. (a) -

Before each election, the vendor for any electronic ballot counting device shall provide the secretary of state with an exact electronic record of the data written to each memory card to be used in the election.

Per RSA 91-A:4 IV(c) If you deny any portion of this request, please cite the specific exemption used to justify the denial to make each record, or part thereof, available for inspection along with a brief explanation of how the exemption applies to the information withheld.

Pursuant to RSA 91.1; these records are being requested to be received within 5 business days (on or before June 14, 2021) to be made available for inspection.

Thank you for your lawful attention to this matter.

Sincerely,
Donna Lenahan

You may send the records by electronic mail to me at:

Per RSA 91-A, governmental records means “any information created, accepted, or obtained by, or on behalf of, any public body, or a quorum or majority thereof, or any public agency in furtherance of its official function. Without limiting the foregoing, the term “governmental records” includes any written communication or other information, whether in paper, electronic, or other physical form, received by a quorum or majority of a public body in furtherance of its official function, whether at a meeting or outside a meeting of the body. The term “governmental records” shall also include the term “public records.””

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