

B E C K & L E E
t r i a l l a w y e r s m i a m i

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**Public Records Request – All Public Records, Including Ballots, Relating to
the 2016 Primary Election**

September 19, 2016

Via Certified Mail, Return Receipt Requested & E-Mail

Dr. Brenda C. Snipes
Broward County Supervisor of Elections
115 S. Andrews Avenue
Room 102
Fort Lauderdale, Florida 33301
Phone: 954-357-7050
elections@browardsoe.org

Christina White
Miami-Dade County Supervisor of Elections
2700 NW 87 Avenue
Doral, Florida 33172
Phone: 305-499-8683
soedade@miamidade.gov

RE: Public Records Request -- All Public Records, Including Ballots, Relating to the
2016 Primary Election

Dear Dr. Snipes and Ms. White:

We represent Do The Right Thing PAC, Inc. d/b/a JamPAC (“JamPAC”), an independent-expenditure only political action committee (“Super PAC”).

On behalf of JamPAC, we write pursuant to Article I, section 24 of the Florida Constitution and Chapter 119, Florida Statutes, and 52 U.S.C. § 20701 (Retention and preservation of records and papers by officers of elections; deposit with custodian; penalty for violation).

JamPAC is requesting an opportunity to inspect and/or obtain copies of the following public records relating to the 2016 Primary Election:

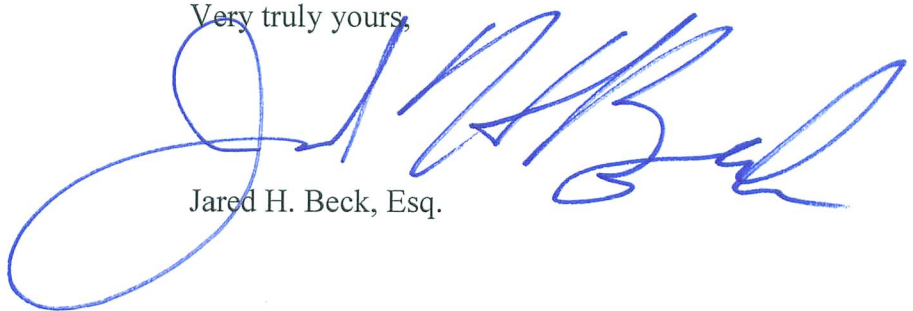
- **All ballots, including absentee ballots, cast in the 2016 Primary Election.**
- **All electronic data, including but not limited to ballot scans and graphical scans, relating to the 2016 Primary Election.**
- **All ballot chain-of-custody data.**
- **All electromechanical components of the voting system(s) used in the 2016 Primary Election, including but not limited to, all hardware and software used in the election management system, the precinct count system, and the central count system.**
- **All documents and correspondence referring or relating to the foregoing records.**

We request that you immediately cease any attempts to delete, erase, shred, or otherwise tamper with the requested records and papers, including all electronic data, and that you continue to maintain chain of custody until we have completed our investigation. This request is grounded in Article I, section 24 of the Florida Constitution and Chapter 119, Florida Statutes, as well as 52 U.S.C. § 20701, which states that you must retain and preserve, for a period of twenty-two (22) months all records and papers relating to voting in the primary elections.

Should you deny JamPAC's request, or any part of the request, please state in writing the basis for the denial, including the exact statutory citation authorizing the denial as required by section 119.07(1)(d), Florida Statutes.

We will be contacting your office within the next two business days to discuss when JamPAC may expect fulfillment of its request and payment of any statutorily prescribed fees. Should you have any questions, please do not hesitate to contact me at 305-234-2060 or jared@beckandlee.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Jared H. Beck', is written over the typed name below.

Jared H. Beck, Esq.

cc: JamPAC file
Elizabeth Lee Beck, Esq.
Cullin O'Brien Law, P.A.
Antonino G. Hernandez P.A.