



Georgia

P.O. Box 77208, Atlanta, GA 30357  
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August 14, 2018

Randolph County Board of Elections and Registration  
P.O. Box 532  
Cuthbert, GA 39840  
tblack.randolphcounty@gmail.com

CC: Randolph County Board of Commissioners  
P.O. Box 221  
Cuthbert, GA 39840  
randolphclerkga@gmail.com

Via Certified Mail and E-mail

To the Members of the Randolph County Board of Elections and Registration,

The ACLU of Georgia writes to express grave concern about your discriminatory proposal to eliminate over 75% of polling places (7 out of 9) on the eve of the November elections. These polling place closures will virtually guarantee lower voter turnout in a Black Belt county that is predominantly African-American (60%),<sup>1</sup> and will completely prevent rural voters without transportation (again, disproportionately African-American) from voting in-person on Election Day.

The timing of your proposal is also suspicious and calls to question your true motives behind this proposal. These are the exact same polling places used in the primary and primary run-off earlier this year. It makes no sense to suddenly *reduce* the number of polling places for this November's election, which will see far higher voter turnout than in the primaries or the primary run-off. Your proposal has also been plagued by procedural irregularities that cast further doubt about the real motivation behind these proposals.

Making it disproportionately harder for African American voters to cast a ballot—especially when done so deliberately—is a violation of Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, and the Fourteenth and Fifteenth Amendments to the United States Constitution. We demand that you reject this proposal or you will face potential legal liability.

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<sup>1</sup> Attached as Exhibit A is the map showing the two precincts that would remain after the proposed consolidation. According to your public notice, all the polling places designated in all capital letters will be eliminated except "CUTHBERT/COURTHOUSE" and "SHELLMAN".

**I. Suddenly eliminating 7 out of 9 polling places in a predominantly African-American county is discriminatory and unjustifiable**

As you are aware, Randolph County is in the Black Belt and is predominantly African-American. According to the latest Census figures, its proportion of African Americans is over 61.4%, which is twice the proportion of African Americans in the entire state (32.2%). *See* Exhibit B. Making it harder for Randolph County voters to cast a ballot means making it disproportionately harder for African Americans in the State of Georgia to cast a ballot in this November’s elections. Indeed, the eliminated polling place with the highest registered voter population, Cuthbert Middle School, serves a 96.7% Black population (330 registered voters out of 341 registered voters assigned to the polling place).

Furthermore, your elimination of polling places surrounding Cuthbert and Shellman will completely prevent rural voters without transportation from voting in-person on Election Day. There is about a 10-mile distance from each of the eliminated polling places to one of the two polling places that would remain. *See* Exhibit A. For a voter with a car, that adds about 10 to 20 minutes of driving to reach the new polling place; for a voter without a car, that is a 3.5 *hour walk*. And there is no public transportation from these outlying areas into Cuthbert and Shellman.

These transportation burdens will also fall disproportionately on African Americans. Randolph County, which is disproportionately African-American, has over *three times* as many people without vehicles as compared to the state of Georgia—22.3% of Randolph County households lack vehicles, as compared to 6.9% of all Georgia households. *See* Exhibit C; *see also* <https://bit.ly/2MiUQ2n> (racially disparate vehicle ownership statistics nationwide). The poverty rate of Randolph County is also nearly twice that of the state (30.5% compared to 16.0%), and its median income is 40% lower than the rest of the state (\$30,358 compared to \$51,037). *See* Exhibit B.

When polling place configurations or closures have such a starkly disproportionate impact on racial minorities or lower-income rural voters without transportation, such closures almost certainly constitute a violation of the Voting Rights Act or the United States Constitution. Several federal courts have struck down these kinds of plans on this basis. *See, e.g., Common Cause Indiana v. Marion Cnty. Election Bd.*, 311 F. Supp. 3d 949 (S.D. Ind. 2018) (shutdown of early voting locations likely unconstitutional because of “its disparate impact on voters who lack the financial means or flexible schedules (i.e., those with little power over their own conditions of work, study, or travel) to surmount the obstacles of time and expense imposed [by the closures]”); *Sanchez v. Cegavske*, 214 F. Supp.3d 961, 974 (D. Nevada Oct. 7, 2016) (likely violation of Voting Rights Act where “the distance [one] must travel [to polling location] are a material limitation that bears more heavily on members of [the Native American tribe]” compared to white voters, “especially given their relative difficulty in accessing transportation [and] affording travel”); *Spirit Lake Tribe v. Benson Cnty.*, No. 2:10-cv-095, 2010 WL 4226614, at \*3-\*4 (D.N.D. Oct. 21, 2010) (closure of polling place on Native American reservation likely violated Voting Rights Act, where Natives have “markedly lower socioeconomic status compared to the white population”); *Operation Push v. Allain*, 674 F. Supp. 1245, 1262-68 (N.D. Miss. 1987) (prohibition on satellite registration offices in disproportionately minority areas

violated Voting Rights Act where there were “vast socio-economic disparities between blacks and whites in Mississippi”); *Brown v. Dean*, 555 F. Supp. 502, 504-05 (D.R.I. 1982) (“the use of polling places at locations remote from black communities, or at places calculated to intimidate blacks from entering (when alternatives were available)” violates Voting Rights Act).

## **II. There is evidence that your proposal is motivated by discriminatory intent**

There is also evidence that your proposal is motivated by discriminatory intent. Restrictions on voting motivated by discriminatory intent violate the Voting Rights Act and are unconstitutional. “Subjects of proper inquiry in determining whether racially discriminatory intent exist[s] include: the racial impact of the official action; the historical background of the decision; the specific sequence of events leading up to the challenged law; departures from substantive and procedural norms; and legislative or administrative history.” *Lewis v. Governor of Alabama*, --- F.3d ----, 2018 WL 3552408 (11th Cir. July 25, 2018) (quoting *Arlington Heights v. Metropolitan Housing Dev. Corp.*, 429 U.S. 252, 266-68 (1977) (quotation marks omitted)).

As noted above, the racial impact of eliminating over 75% of polling places in a Black Belt county on the eve of an election is obvious. The timing of your decision is also suspicious. These are the exact same polling places used in the primaries and primary run-off earlier this year. It makes no sense to suddenly *reduce* the number of polling places for this November’s high-turnout general election, which will see far higher voter turnout than in the primaries or the primary run-off.

As experienced elections officials, you are further aware that suddenly changing polling locations midstream is likely to cause voter confusion, especially for those who voted earlier this year. This, combined with the fact that this race involves a first-time African-American nominee for governor, further casts doubts about your motives.

Odd procedural irregularities also plague this decision-making process. On August 9, 2018, you simultaneously took out two separate notices in the local paper with conflicting and confusing information about these polling place closures. *See* Exhibits D, E. In the first notice, you say that the Randolph County Board of Elections & Registration will be holding two public meetings on the subject: one on August 16 and one on August 17, at the two polling locations that would remain under the plan. *See* Exhibit D. This notice suggests that a final decision will be made on August 17. This, of course, would be illegal, because state law requires you to provide notice for two consecutive weeks before any polling place changes. *See* O.C.G.A. § 21-2-265(a). In the second notice, you say that the Randolph County Board of Elections & Registration will be holding a meeting on this proposal on August 24, without specifying a time or location for this meeting. *See* Exhibit E.

In addition to these procedural irregularities, we submitted an Open Records Request to your office on Thursday, August 9, 2018, *see* Exhibit F, requesting information related to these proposed closures, which would include the “full investigation of the facts” that you are required to perform before any precinct changes occur. O.C.G.A. § 21-2-262(a). However, you did not

respond within three business days (Tuesday, August 14, 2018) as required by state law. *See* O.C.G.A. § 50-18-71(b)(1)(A). It is now the end of the business day and we have yet to receive a response. We can only assume that you have not performed the full investigation or analysis you are statutorily required to perform, that you have no factual basis for this proposal, that you are reluctant to reveal the bases or non-bases for this proposal, or some other explanation. Regardless, your violation of state law is further evidence of discriminatory motive.

In combination with the clear impact on African American voters, these circumstances leave a reasonable observer to wonder whether the real motive behind these closures is indeed to make it harder for African Americans to cast a ballot.

\* \* \*

The mere availability of absentee voting-by-mail and advance voting does not justify the closure of polling locations on Election Day under your proposal. Several federal courts have found that voting by mail is not an adequate substitute for in-person voting:

[Though mail-in voting] represents an important bridge for many who would otherwise have difficulty appearing in person, . . . it is not the equivalent of in-person voting for those who are able and want to vote in person. Mail-in voting involves a complex procedure that cannot be done at the last minute. It also deprives voters of the help they would normally receive in filling out ballots at the polls . . . . Elderly [voters] may also face difficulties getting to their mailboxes . . . , the increased risk of fraud because of people who harvest mail-in ballots from the elderly, [and] with mail-in voting, voters lose the ability to account for last-minute developments, like candidates dropping out of a primary race, or targeted mailers and other information disseminated right before an election.

*Veasey v. Abbott*, 830 F.3d 216, 255-56 (5th Cir. 2016) (en banc); *see also Ohio NAACP v. Husted*, 768 F.3d 524, 542 (6th Cir. 2014) (“associated costs and more complex mechanics of voting by mail” do not make voting by mail a “suitable alternative for many voters,” especially “African Americans, lower income individuals, and the homeless”); *League of Women Voters of N.C. v. N.C.*, 769 F.3d 224, 243 (4th Cir. 2014) (rejecting argument that restrictions on voting mitigated by the option of voting by mail).

Nor does advance voting provide an adequate alternative for the many voters who do not vote before Election Day, because late-breaking events or new information may cause them to change their mind. Media attention and campaign activity also increases in the days leading up to Election Day, galvanizing voters just before that date.

Furthermore, as discussed above, many lower-income voters from the rural parts of Randolph County may not be able to get to Cuthbert or Spellman to take advantage of advance voting without unreasonable effort. The advance voting period is also almost entirely limited to weekday business hours, O.C.G.A. § 21-2-385(d), but “[l]ower-income individuals face

difficulties in voting during the day because they are more likely to work in hourly-wage jobs with little flexibility.” *Ohio NAACP*, 768 F.3d at 556. Thus, Election Day hours, which extend from 7 a.m. to 7 p.m. beyond regular business hours, O.C.G.A. § 21-2-403, may be the only time such voters can cast a ballot, so it is especially important that polling sites be reasonably accessible that day.

To avoid continuing legal exposure, you must reject the proposal to shut down over 75% of the polling locations in Randolph County.

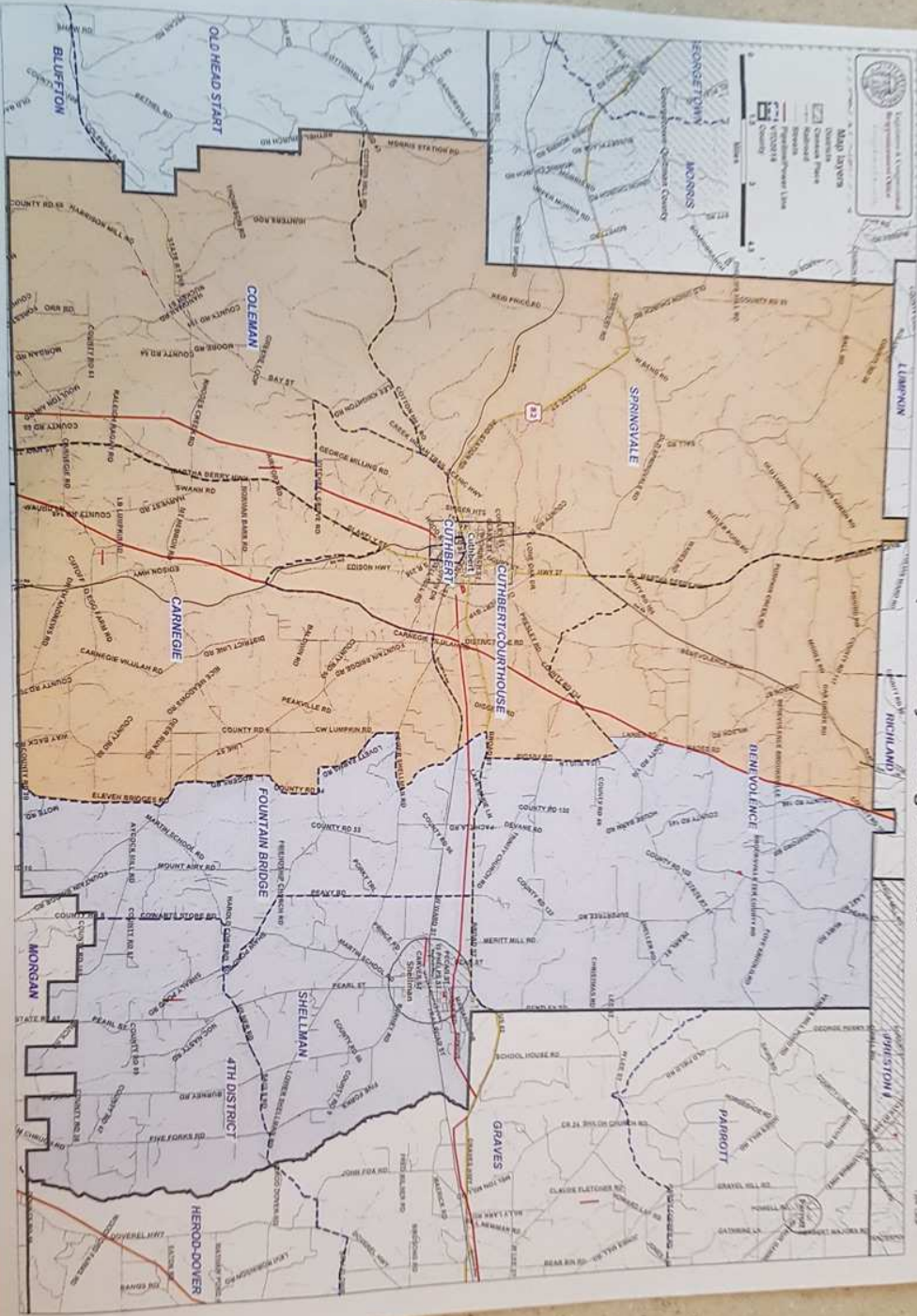
Sincerely,

A handwritten signature in black ink, appearing to read "Sean J. Young". The signature is fluid and cursive, with the first name "Sean" being more prominent than the last name "Young".

Sean J. Young  
Legal Director  
ACLU of Georgia

# **EXHIBIT A**

# Proposed Randolph County Voting Precincts



# **EXHIBIT B**




## QuickFacts

### Georgia; Randolph County, Georgia

QuickFacts provides statistics for all states and counties, and for cities and towns with a **population of 5,000 or more**.

#### Table

All Topics	Georgia	Randolph County, Georgia
<b>Population estimates, July 1, 2017, (V2017)</b>	<b>10,429,379</b>	<b>7,075</b>
 <b>PEOPLE</b>		
<b>Population</b>		
<b>Population estimates, July 1, 2017, (V2017)</b>	<b>10,429,379</b>	<b>7,075</b>
Population estimates base, April 1, 2010, (V2017)	9,688,690	7,719
Population, percent change - April 1, 2010 (estimates base) to July 1, 2017, (V2017)	7.6%	-8.3%
Population, Census, April 1, 2010	9,687,653	7,719
<b>Age and Sex</b>		
Persons under 5 years, percent	▲ 6.3%	▲ 5.6%
Persons under 18 years, percent	▲ 24.1%	▲ 19.8%
Persons 65 years and over, percent	▲ 13.5%	▲ 23.2%
Female persons, percent	▲ 51.3%	▲ 54.0%
<b>Race and Hispanic Origin</b>		
White alone, percent (a)	▲ 60.8%	▲ 37.1%
Black or African American alone, percent (a)	▲ 32.2%	▲ 61.4%
American Indian and Alaska Native alone, percent (a)	▲ 0.5%	▲ 0.1%
Asian alone, percent (a)	▲ 4.2%	▲ 0.6%
Native Hawaiian and Other Pacific Islander alone, percent (a)	▲ 0.1%	▲ 0.1%
Two or More Races, percent	▲ 2.1%	▲ 0.7%
Hispanic or Latino, percent (b)	▲ 9.6%	▲ 2.5%
White alone, not Hispanic or Latino, percent	▲ 52.8%	▲ 35.4%
<b>Population Characteristics</b>		
Veterans, 2012-2016	662,333	403
Foreign born persons, percent, 2012-2016	9.8%	2.4%
<b>Housing</b>		
Housing units, July 1, 2017, (V2017)	4,282,106	4,105
Owner-occupied housing unit rate, 2012-2016	62.8%	57.6%
	\$152,400	\$71,600

Median value of owner-occupied housing units, 2012-2016		
Median selected monthly owner costs -with a mortgage, 2012-2016	\$1,339	\$931
Median selected monthly owner costs -without a mortgage, 2012-2016	\$395	\$326
Median gross rent, 2012-2016	\$897	\$588
Building permits, 2017	51,240	4

### Families & Living Arrangements

Households, 2012-2016	3,611,706	2,819
Persons per household, 2012-2016	2.72	2.50
Living in same house 1 year ago, percent of persons age 1 year+, 2012-2016	84.0%	84.4%
Language other than English spoken at home, percent of persons age 5 years+, 2012-2016	13.7%	3.1%

### Education

High school graduate or higher, percent of persons age 25 years+, 2012-2016	85.8%	70.7%
Bachelor's degree or higher, percent of persons age 25 years+, 2012-2016	29.4%	13.4%

### Health

With a disability, under age 65 years, percent, 2012-2016	8.8%	11.2%
Persons without health insurance, under age 65 years, percent	▲ 14.8%	▲ 14.6%

### Economy

In civilian labor force, total, percent of population age 16 years+, 2012-2016	62.3%	51.2%
In civilian labor force, female, percent of population age 16 years+, 2012-2016	57.9%	46.7%
Total accommodation and food services sales, 2012 (\$1,000) (c)	18,976,611	2,652
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	51,800,643	D
Total manufacturers shipments, 2012 (\$1,000) (c)	155,836,792	D
Total merchant wholesaler sales, 2012 (\$1,000) (c)	143,645,290	70,790
Total retail sales, 2012 (\$1,000) (c)	119,801,495	47,645
Total retail sales per capita, 2012 (c)	\$12,077	\$6,503

### Transportation

Mean travel time to work (minutes), workers age 16 years+, 2012-2016	27.7	18.7
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### Income & Poverty

Median household income (in 2016 dollars), 2012-2016	\$51,037	\$30,358
Per capita income in past 12 months (in 2016 dollars), 2012-2016	\$26,678	\$26,198
Persons in poverty, percent	▲ 16.0%	▲ 30.5%

## BUSINESSES

### Businesses

Total employer establishments, 2016	228,330 <sup>1</sup>	130
Total employment, 2016	3,804,433 <sup>1</sup>	1,393
Total annual payroll, 2016 (\$1,000)	182,911,144 <sup>1</sup>	45,113
Total employment, percent change, 2015-2016	3.0% <sup>1</sup>	3.0%
Total nonemployer establishments, 2016	877,908	408

All firms, 2012	929,864	497
Men-owned firms, 2012	480,578	262
Women-owned firms, 2012	376,506	183
Minority-owned firms, 2012	371,588	204
Nonminority-owned firms, 2012	538,893	270
Veteran-owned firms, 2012	96,787	57
Nonveteran-owned firms, 2012	800,585	415


 **GEOGRAPHY**


**Geography**

Population per square mile, 2010	168.4	18.0
Land area in square miles, 2010	57,513.49	428.24
FIPS Code	13	13243

**Value Notes**

- 1. Includes data not distributed by county.

 Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources.

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info  icon to the left of each row in TABLE view to learn about sampling error.

The vintage year (e.g., V2017) refers to the final year of the series (2010 thru 2017). *Different vintage years of estimates are not comparable.*

**Fact Notes**

- (a) Includes persons reporting only one race
- (b) Hispanics may be of any race, so also are included in applicable race categories
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data

**Value Flags**

- D** Suppressed to avoid disclosure of confidential information
- F** Fewer than 25 firms
- FN** Footnote on this item in place of data
- NA** Not available
- S** Suppressed; does not meet publication standards
- X** Not applicable
- Z** Value greater than zero but less than half unit of measure shown
- Either no or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest or upper interval of an open ended distribution.

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

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- Population Projections
- Health Insurance
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# **EXHIBIT C**

B08201

**HOUSEHOLD SIZE BY VEHICLES AVAILABLE**  
**Universe: Households**  
**2011-2015 American Community Survey 5-Year Estimates**

Tell us what you think. [Provide feedback to help make American Community Survey data more useful for you.](#)

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the [Data and Documentation](#) section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the [Methodology](#) section.

Versions of this table are available for the following years:

[2016](#)  
[2015](#)  
[2014](#)  
[2013](#)  
[2012](#)  
[2011](#)  
[2010](#)

1 - 30 of 30		Georgia		Randolph County, Georgia	
		Estimate	Margin of Error	Estimate	Margin of Error
	Total:	3,574,362	+/-9,977	2,794	+/-217
	No vehicle available	246,172	+/-4,178	623	+/-196
	1 vehicle available	1,218,616	+/-6,994	854	+/-181
	2 vehicles available	1,373,011	+/-8,305	803	+/-200
	3 vehicles available	520,340	+/-5,537	290	+/-117
	4 or more vehicles available	216,223	+/-3,512	224	+/-96
	1-person household:	956,577	+/-6,570	762	+/-203
	No vehicle available	133,835	+/-2,739	334	+/-138
	1 vehicle available	649,406	+/-5,523	310	+/-126
	2 vehicles available	140,013	+/-2,787	93	+/-61
	3 vehicles available	24,076	+/-1,218	25	+/-33
	4 or more vehicles available	9,247	+/-756	0	+/-18
	2-person household:	1,170,992	+/-6,331	1,274	+/-265
	No vehicle available	52,793	+/-1,891	162	+/-85
	1 vehicle available	278,735	+/-3,979	292	+/-137
	2 vehicles available	621,947	+/-5,639	487	+/-160
	3 vehicles available	168,895	+/-2,741	207	+/-99
	4 or more vehicles available	48,622	+/-1,533	126	+/-85
	3-person household:	598,492	+/-6,351	257	+/-123
	No vehicle available	27,089	+/-1,200	0	+/-18
	1 vehicle available	139,385	+/-3,430	103	+/-79
	2 vehicles available	241,731	+/-3,594	123	+/-97
	3 vehicles available	144,880	+/-3,093	12	+/-20
	4 or more vehicles available	45,407	+/-1,558	19	+/-20
	4-or-more-person household:	848,301	+/-5,463	501	+/-121
	No vehicle available	32,455	+/-1,588	127	+/-94
	1 vehicle available	151,090	+/-3,203	149	+/-93
	2 vehicles available	369,320	+/-4,294	100	+/-59

	Georgia		Randolph County, Georgia	
	Estimate	Margin of Error	Estimate	Margin of Error
3 vehicles available	182,489	+/-3,806	46	+/-39
4 or more vehicles available	112,947	+/-2,331	79	+/-55

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

#### Explanation of Symbols:

An '\*\*\*' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.

An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.

An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.

An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.

An '\*\*\*' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.

An '\*\*\*\*\*' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.

An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.

An '(X)' means that the estimate is not applicable or not available.

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see [Accuracy of the Data](#)). The effect of nonsampling error is not represented in these tables.

Workers include members of the Armed Forces and civilians who were at work last week.

While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

# **EXHIBIT D**



## Election Notices

State of Georgia  
County of Randolph

### PUBLIC MEETING

The Randolph County Board of Elections & Registration will be holding 2 public meetings to discuss Precinct Consolidation. The first meeting will be held on Thursday, August 16, 2018 at 6:00PM in the courtroom at the Randolph County Government Building at 93 Front Street, Cuthbert Ga. The second meeting will be Friday, August 17, 2018 at 6:00PM at the Train Depot at 58 Park Ave, Shellman Ga.

J. Scott Peavy  
Superintendent of Elections  
Randolph County, Georgia

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## **Randolph County B** **hiring for the fol**

# **EXHIBIT E**

Deadline to submit application:  
September 5, 2018

## NOTICE OF CONSOLIDATION OF VOTING PRECINCTS

Notice is given that the Randolph County Board of Elections and Registration, acting as Election Superintendent for Randolph County, proposes to consolidate the following precincts into a single precinct with a polling place located at the Cuthbert Courthouse, 93 Front St, Cuthbert, GA 39840: Springvale, Coleman, Carnegie, Cuthbert Middle School and current Cuthbert Courthouse. Additionally, all voters who currently reside in the Benevolence precinct and reside west of the gas line that is marked with a red line on the map on file in the Elections Office shall also be included in the consolidated precinct.

The Randolph County Board of Elections and Registration further proposes to consolidate the following precincts into a single precinct with the current Shellman precinct: Fountain Bridge, Shellman and Fourth District. Additionally, all voters who currently reside in the Benevolence precinct and reside east of the gas line that is marked with a redline on the map on file in the Elections Office shall also be included in the consolidated precinct. The polling place for these precincts shall be located at the Shellman Train Depot, 58 Park Avenue, Shellman, Georgia 39886

The Randolph County Board of Elections will hold a meeting on August 24, 2018 to consider this proposal. Any objection to this proposal must be filed with the Board of Elections prior to that time. A copy of a map of the proposed consolidated precincts is available for inspection at the Randolph County Board of Elections. This change shall become effective for all elections held on or after the 24<sup>th</sup> day of August 2018.

**RANDOLPH COUNTY BOARD OF  
ELECTIONS AND REGISTRATION,  
ACTING AS ELECTION SUPERINTENDENT FOR RAN-  
DOLPH COUNTY, GEORGIA.**

# **EXHIBIT F**

## Sean J Young

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**From:** Sean J Young  
**Sent:** Friday, August 10, 2018 11:24 AM  
**To:** 'tblack.randolphcounty@gmail.com'  
**Subject:** RE: Open Records Request: August 9, 2018

Thank you confirming yesterday over the phone that you received this request. We will expect a response by Tuesday, August 14, which is three business days from our request. Please let me know if you have any questions.

Sean

**Sean J. Young**  
**Legal Director**  
American Civil Liberties Union of Georgia  
PO Box 77208, Atlanta, GA 30357  
[SYoung@acluga.org](mailto:SYoung@acluga.org) | Phone 678-981-5295 | Fax 770-303-0060  
**WE THE PEOPLE** | [acluga.org](http://acluga.org)     
Pronouns: he/him/his



*This message may contain information that is confidential or legally privileged. If you are not the intended recipient, please immediately advise the sender by reply email that this message has been inadvertently transmitted to you and delete this email from your system.*

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**From:** Sean J Young  
**Sent:** Thursday, August 9, 2018 2:18 PM  
**To:** 'tblack.randolphcounty@gmail.com' <tblack.randolphcounty@gmail.com>  
**Subject:** Open Records Request: August 9, 2018

Dear Randolph County Board of Elections & Registration,

Pursuant to the Open Records Act, I am requesting copies of the following documents:

- All e-mails, documents, and communications, whether exchanged through personal email addresses or work email addresses, concerning the proposed precinct consolidations to be discussed in upcoming meetings on August 16, August 17, and/or August 24, 2018.

I expect a response within three business days pursuant to the Open Records Act. Please give me a call if you have any questions.

Sean

**Sean J. Young**

**Legal Director**

**American Civil Liberties Union of Georgia**

PO Box 77208, Atlanta, GA 30357

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**WE THE PEOPLE** | [acluga.org](http://acluga.org)   

Pronouns: he/him/his



"What makes an American is not the name or the blood or even the place of birth, but the belief in the principles of freedom and equality that this country stands for." - Antonin Scalia

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