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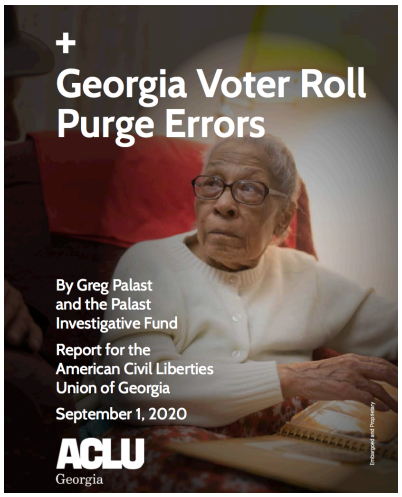
Mr. Brad Raffensperger
Secretary of State of Georgia
214 State Capitol
Atlanta, Georgia 30334
soscontact@sos.ga.gov

Dear Secretary Raffensperger,

I write as counsel for Greg Palast and the Palast Investigative Fund. The Palast Investigative Fund, directed by investigative reporter Greg Palast, is a non-partisan, not-for-profit project of the 501c3 Sustainable Markets Foundation.

We are writing to demand that you obtain and review the evidence that your office has wrongly removed no less than 198,351 voters from the registration rolls. As you have acknowledged, the American Civil Liberties Union of Georgia released a report, referenced here, by the Palast Investigative Fund. This report provides detailed evidence by the nation's top experts in address verification, including the official licensee of the US Postal Service, which took issue with your removal of these 198,351 voters moved, justifying canceling their registrations.



In fact, you and your predecessor based on unreliable information, wrongly removed voters who have not moved or moved only within their county and remain eligible to vote. Your predecessor's victims of a purge using the same erroneous methodology resulted, infamously, of the removal of voters including Martin Luther King's 92-year old cousin. She was one of many wrongly purged voters filmed by the Palast Investigative Fund who were identified as having moved their voting residence—but, in fact, did not move.

On behalf of Mr. Palast, I am asking, in fact, demanding, that you review the list provided by the experts of the wrongly purged *and the* evidence. To this end, Mr. Palast is offering to assist, and even cover the cost of, obtaining the *correct* list of

voters who have moved and those who have not. This can be done in two days without violating the Palast Investigative Fund's contract with the Post Office nor violating privacy of individuals.

For example, The Secretary of State's records indicate that 108,306 voters were purged because they were allegedly identified by the Postal Service's National Change of Address (NCOA) registry. In fact, the official US Postal Service licensee, Merkle Inc., has identified only 27,898 of those voters as having moved.

It appears your errors occurred because you did not hire a Postal Service licensee as required by law. To wit: The National Voter Registration Act 52 USC Ch. 205(c) states under the heading, "Voter removal programs,

"(1) A State may meet the requirement of subsection (a)(4) by establishing a program under which—

"(A) change-of-address information supplied by the Postal Service through its **licensees** is used to identify registrants whose ad- dresses may have changed..." [Emphasis added.]

Mr. Palast is prepared to help you correct the errors immediately in time for legitimate voters to be returned to rolls for this election.

Here is the rapid, safe procedure we propose:

1. The Palast Fund will pay for the leading Postal Service Licensee, Merkle Inc., to provide the *licensed* National Change of Address registry to compare to the list marked "NCOA" by the Secretary of State. We are informed the Secretary of State used a marketing company called Total Data Technologies of Nebraska. (TDT, apparently, is *not* a Postal Service licensee—though a licensee is required by the National Voter Registration Act in order to purges voters who did not report their move.)

The Secretary of State will have to sign the USPS' license agreement—and follow its requirements and restrictions**. One requirement is that the Secretary of State use the list for mailing.** We suggest you use the mailing to notify voters that they have had their rights restored. I would note that the Palast Fund's list was used by Black Voters Matter to inform 98,000 voters you have cancelled their registrations.

2. Mr. Palast will authorize the address list hygiene experts, led by John Lenser, to meet immediately --safely, via Zoom-- with TDT or anyone the Secretary of State designates to go over the lists and determine the source of error in the state's un-licensed list—and help the state make any corrections. We will also pay for additional assistance by address hygiene experts at Computech Inc. to help with any related technical matters.

3. There is no need to make the meeting of experts a closed session. If the Secretary of State wishes, the public can be invited to watch the Zoom meeting live. We encourage such open government.

4. This could all be done swiftly, within 48 hours if the participants can coordinate time.

5. A legitimate concern has been expressed by Black Voters Matter Fund that rather than this offer resulting in a sincere review of the veracity of the purge list for the purpose of returning wrongly dis-enfranchised voters to the rolls, that it will end up as a "PR stunt." The concern is that the Secretary's functionaries will simply pour over names, to try to find voters now dead or who moved, to attempt to dismiss our expert's findings and refuse to consider the plight of voters who have been wrongly placed your lists.

In this regard, it should be noted that our experts used the address status of voters in *October 2019*, to match the Sec. of State's time frame. It's now been a year, so doubtless, thousands of the over 198,000 identified as wrongly purged have, in these 12 months, moved or died. That does not discredit the findings that the overwhelming majority of this group were wrongfully removed from the voter rolls. I want to also inform you that the this group is only those who have not moved at all, and does not include people who moved within their own county, who I believe should not have been removed.

This proposed method above will allow an update to data current with the Post Office and other sources.

There is no harm returning names to the rolls, even if some are now departed: there is zero evidence of impersonation voter fraud in Georgia. On the other hand, there is heartbreaking evidence of the damage caused to voters like King's cousin Christine Jordan who were wrongly purged. Their vote should be restored.

I know that neither the ACLU, the Palast Investigative Fund nor the experts can determine the sincerity of the Secretary of State's desire to review the list. Nevertheless, this offer will put the list in the state's hands to offer the State the chance to rectify this wrong. Mr. Palast cannot know in advance if the State will act in good faith to do this, however he is prepared to help the State obtain and analyze the list rapidly.

As you know, the NVRA is clear. Your office must maintain "accurate" voter rolls. You are not free to make voter rolls inaccurate by purging voters based on wrong information and inaccurate methods. Now that you know of the errors it is incumbent on you to take the necessary steps to make the rolls accurate.

Mr. Palast and I are prepared to work with your office to restore the accuracy of Georgia's voter rolls.

Sincerely,

/s/

Jeanne Mirer

Cc: Greg Palast, Journalist, Palast Investigative Fund
Andrea Young, Executive Director, ACLU Georgia