

MILLER & JOHNSON, PLLC

ATTORNEYS AND COUNSELORS AT LAW
766 WEST KING STREET
POST OFFICE BOX 49
BOONE, NORTH CAROLINA 28607

PAUL E. MILLER, JR.
NATHAN A. MILLER

PHONE (828) 264-1125
FAX (828) 262-3544
MJLAWFIRM@BELLSOUTH.NET

July 24, 2014

Ms. Kathleen Campbell
Member, Watauga County Board of Elections
c/o Jane Ann Hodges, Director
842 West King Street, Suite 6
Boone, NC 28607
VIA Hand Delivery

Re: Public Records Request pursuant to N.C. Gen. Stat. §132-1

Dear Ms. Campbell:

Pursuant to N.C. Gen. Stat. §132-1, please consider this a formal request for the following public records as referenced in your handouts to the Watauga County Board of Elections at their meeting on July 23, 2014:

1. All documents relied upon by you in preparing your comparison on the 2009 and 2013 municipal turnout numbers
2. All documents relied upon by you in preparing your analysis of the 2010 primary election numbers and turnout
3. All documents relied upon by you in preparing your 2013 municipal election comparison and your 2014 primary election comparison
4. All documents reviewed by you related to your preparation of the 2013/2014 turnout by race in these elections
5. All documents reviewed by you related to your handout entitled "Data Comparisons Watauga County Elections"
6. All documents reviewed by you obtained from the Watauga County Board of Elections and the North Carolina State Board of Elections related to your handouts at the July 23, 2014 meeting
7. A copy of all "complaint forms" filled out by voters related to the 2013 municipal election and the 2014 primary election, including but not limited to the six voters "turned away for being in the wrong precinct"
8. All documents regarding individuals who were not able to vote as referenced on page four of your handouts at the July 23, 2014 meeting
9. A copy of all documents relied upon by you in compiling the information set forth in Chart 6 of your handouts at the July 23, 2014 Board of Elections Meeting
10. A copy of all documents reviewed by you in compiling the information set forth in Chart 6 of your handouts at the July 23, 2014 Board of Elections Meeting
11. A copy of all documents relied upon by you in compiling the information set forth in Chart 7 of your handouts at the July 23, 2014 Board of Elections Meeting
12. A copy of all documents reviewed by you in compiling the information set forth in Chart 7 of your

handouts at the July 23, 2014 Board of Elections Meeting

13. All documents which support your statement that voting at the Agricultural Conference Center for Boone III "was meant by the Democrats to be a temporary site...."

14. All documents which support your statement on Page 8 of your handout at the July 23, 2014 meeting of the Board of Elections that "Boone I voters were very angry when they were turned away from voting at the Courthouse."

15. A copy of the "signed and sworn statement from poll worker, Trish Rokoske" as referenced in your handout

16. A copy of any and all other signed statements from poll workers regarding the 2013 municipal election and/or the 2014 primary election

17. A copy of all documents which support your statement that "I believe the issue of no longer being able to use provisional votes is the most important issue driving voter suppression in Watauga County."

18. A copy of all "written complaints from people" as referenced in your comment on page 9 of your handout

19. A copy of all "videos of students and others having problems voting" as referenced in your comment on page 9 of your handout

20. A copy of the complete "video of a black voter who lives in the Hospitality house...."

21. All documents reviewed by you related to your statement that "young voters, 18-21 years of age decreased ..." as set forth on Page Ten of your handout

22. All documents which you contend support your statement on Page Ten of your handout that "precincts ... have been deliberately moved to make them less accessible..."

23. All emails or other written communication between you and any of the following individuals between September 1, 2013 at the date of your response to this public records request which is related to voting, elections, political activities, and/or any of the issues contained in any of your handouts at the July 23, 2014 Watauga County Board of Elections meeting: Pamela Williamson; Jerry W. Williamson; Stella Anderson; Diane Tilson; Ian O'Keefe; Jesse Presnell; Glenda Hubbard; Jane Ann Hodges; Larry Henson; Donna Houck; Kathy Idol; and Trish Rokoske.

Please provide all such documents to me at my email address at mjlawfirm@bellsouth.net. For all videos, produce them in their original, unaltered form, as well as in any edited form you may possess. Responses to items 1-22 should be easily produced by you no later than the date of the August 8, 2014 State Board of Elections meeting. Please produce all documents responsive to item 23 no later than July 25, 2014.

Thank you for your prompt and diligent attention to this legally mandated request.

Sincerely,



Nathan A. Miller

MILLER & JOHNSON, PLLC
ATTORNEYS AND COUNSELLORS AT LAW
766 WEST KING STREET
POST OFFICE BOX 49
BOONE, NORTH CAROLINA 28607

Ms. Kathleen Campbell
Member, Watauga County Board of Elections
c/o Jane Ann Hodges, Director
842 West King Street, Suite 6
Boone, NC 28607