



NORTH CAROLINA

STATE BOARD OF ELECTIONS

Mailing Address:
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Raleigh, NC 27611
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(866) 522-4723
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VIA EMAIL ONLY

Avin Bansal
Chief Financial Officer
Clear Ballot Group, Inc.

Pam Geppert
Director of Certification & Proposals
Hart InterCivic

Richard J Jablonski
VP of Finance
ES&S

June 24, 2019

Re: Release of Public Records

Dear Mr. Bansal, Ms. Geppert, and Mr. Jablonski:

On June 14, 2019, the State Board of Elections requested that your companies disclose any owners or shareholders with a 5% or greater interest or share in each of the vendor's company, any subsidiary company, of the vendor, and the vendor's parent company. You were also asked to designate any information that you believe is exempt from disclosure under North Carolina's public records law pursuant to G.S. § 132-1.2(1). In subsequent communications on June 20 and/or 21, you were reminded of the requirements regarding designation of confidential information. You were requested, to the extent you believe the identity of investors or shareholders, or any percentage ownership associated with such individual or entity, should be considered confidential, including meeting the definition of a trade secret, to explain how this information derives "independent actual or potential commercial value from not being generally known or readily ascertainable..." See G.S. § 66-152(3)(a). To date, no explanation has been provided as to how the identity of investors, shareholders, or percentage ownership derives independent actual or potential commercial value from not being generally known or readily ascertainable.

The State Board of Elections has received public records requests for all communications with each vendor regarding the June 14, 2019 request for additional disclosure and subsequent communications. Upon review, it is my belief that the records sought, including correspondence revealing the identity of any owners or shareholders of any vendor, parent company or investor, or percentage ownership, is not subject to any exception that would permit the State Board to withhold it from the public. Therefore, we intend to release the information to the public on or after 4:00 p.m. on June 26, 2019. We are providing you this notice in advance of the disclosure should you wish to seek an injunction or other relief.

Sincerely,

A handwritten signature in black ink that reads "Katelyn Love". The signature is written in a cursive, flowing style.

Katelyn Love
Acting General Counsel

cc: Jonathan Wegner, General Counsel, McCarthy Capital
Paul Cox, Special Deputy Attorney General, N.C. Department of Justice