

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 17-22568-CIV-COOKE/GOODMAN

**ARTHENIA JOYNER; MIKE SUAREZ; JOSHUA
SIMMONS; BRENDA SHAPIRO; LUIS MEURICE; THE
AMERICAN CIVIL LIBERTIES UNION OF FLORIDA, INC.;
FLORIDA IMMIGRANT COALITION, INC.,**

Plaintiffs,

v.

**PRESIDENTIAL ADVISORY COMMISSION ON
ELECTION INTEGRITY; MICHAEL PENCE, in his official
capacity as Chair of the Presidential Advisory
Commission on Election Integrity; KRIS KOBACH, in
his official capacity as Vice Chair of the Presidential
Advisory Commission on Election Integrity;
EXECUTIVE OFFICE OF THE PRESIDENT OF THE
UNITED STATES; EXECUTIVE OFFICE OF THE VICE
PRESIDENT OF THE UNITED STATES; TIM HORNE, in
his official capacity as Administrator of the General
Services Administration; MICK MULVANEY, in his
official capacity as Director, Office of Management and
Budget; KEN DETZNER, in his official capacity as
Florida Secretary of State,**

Defendants.

**PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO FEDERAL DEFENDANTS**

Plaintiffs Arthenia Joyner, Mike Suarez, Joshua Simmons, Brenda Shapiro, Luis Meurice, the American Civil Liberties Union of Florida, Inc., and the Florida Immigrant Coalition, Inc. request that Defendants Presidential Advisory Commission on Election Integrity, Michael Pence, Kris Kobach, the Executive Office of the President of the United States, the Executive Office of the Vice President of the United States, Tim

Horne, and Mick Mulvaney (the “Federal Defendants”) respond to this first set of interrogatories, as required by Federal Rules of Civil Procedure 26 and 33.

INSTRUCTIONS

1. The Federal Defendants are directed to answer, within the time allowed, each of the following interrogatories in writing and under oath pursuant to Federal Rules of Civil Procedure 26 and 33.

2. The terms “identification” and “identify” when used in reference to an individual means to state the individual’s full name, present address, present employment position, and business affiliation. When used in reference to a person other than an individual, such terms mean to state the nature of that person (i.e. a corporation, a partnership, a trust, or other organization), and the name, present address, and principal place of business.

3. The terms “identification” and “identify” when used to refer to a document or documents mean to state the date, the signor or signors, the addressee of the document, if any, the type of document (i.e. letter, fax, e-mail, memorandum, telegram, notice, contract, etc.) and such other terms of description, identifying the document or documents with sufficient particularity to meet the requirements for its or their inclusion in a request for the production of documents pursuant to Federal Rules of Civil Procedure 34. If any such document was, but is no longer in your possession or control, state the disposition of that document and the reason for such disposition. In lieu of identifying any document, a true and correct copy may be annexed to the answers to these interrogatories and incorporated into the answers by specific reference.

DEFINITIONS

4. “You,” “your” and/or “Federal Defendants” means and refers to Defendants Presidential Advisory Commission on Election Integrity, Michael Pence, Kris Kobach, the Executive Office of the President of the United States, the Executive Office

of the Vice President of the United States, Tim Horne, and Mick Mulvaney, and all of agents and individuals working in or for the Federal Defendants.

5. “Communication” means any oral utterance made, heard or overheard to another person or persons, whether in person or by telephone or otherwise, as well as every written document and every other mode of intentionally conveyed meaning.

6. “Complaint” refers to docket entry number 1 in this case of *Joyner v. Presidential Advisory Commission on Election Integrity*, No. 17-cv-22568 (S.D. Fla.).

7. As used herein, the words “concerning,” “pertaining to,” “regarding,” “reflecting,” or “relating to” shall mean: relating to, referring to, containing, concerning, describing, mentioning, constituting, supporting, corroborating, demonstrating, proving, evidencing, refuting, disputing, rebutting, controverting and/or contradicting.

8. Words in the singular include the plural, and vice versa, and the words “and” and “or” include “and/or.” The past tense includes the present tense when the clear meaning is not distorted by the change of tense.

INTERROGATORIES

1. Please detail where and how the Federal Defendants are storing or will store any data or information collected by the Presidential Advisory Commission on Election Integrity.

2. Please detail all steps undertaken by the Federal Defendants to secure or protect any data or information collected by the Presidential Advisory Commission on Election Integrity.

3. Please list the names and addresses of all individuals in charge of keeping the data collected by the Presidential Advisory Commission on Election Integrity secure.

4. Please detail all steps undertaken by the Federal Defendants to ensure that the Presidential Advisory Commission on Election Integrity undertook a Privacy Impact Assessment under the E-Government Act of 2002, 44 U.S.C. § 3501 note. If the Federal Defendants undertook no steps, please explain why not.

5. Please list all meetings held, as of today, by the Presidential Advisory Commission on Election Integrity.

6. Please list all members of the Presidential Advisory Commission on Election Integrity and the date on which they were appointed, designated, or commissioned.

7. Please detail all steps undertaken by the Federal Defendants to ensure the Presidential Advisory Commission on Election Integrity's compliance with the Federal Advisory Committee Act as to the notice and conduct of the Presidential Advisory Commission on Election Integrity's meetings.

8. Please detail all steps undertaken by the Federal Defendants to ensure the Presidential Advisory Commission on Election Integrity's compliance with the Federal Advisory Committee Act as to public participation in the Presidential Advisory Commission on Election Integrity's meetings.

9. Please detail all steps undertaken by the Federal Defendants to ensure that the Presidential Advisory Commission on Election Integrity complied with the Federal Advisory Committee Act's requirement that documents be made available to the public.

10. Please detail all steps undertaken by the Federal Defendants to ensure that the Presidential Advisory Commission on Election Integrity complied with the Federal Advisory Committee Act's requirement that the public be able to attend meetings.

11. Please detail all evidence or information within the Federal Defendants' custody, possession, or control that supports President Donald Trump's statement that he won the popular vote if "you deduct the millions of people who voted illegally," as noted in paragraph 33 of the Complaint.

12. Please detail all evidence or information within the Federal Defendants' custody, possession, or control that supports Defendant Kris Kobach's statement on Brietbart News that the Commission did not request the last four digits of voters' Social Security numbers, as noted in paragraph 63 of the Complaint.

13. Please detail all evidence or information within the Federal Defendants' custody, possession, or control that supports Defendant Kris Kobach's statement on Brietbart News that "there is no threat that the Commission's work might compromise anyone's privacy," as noted in paragraph 63 of the Complaint.

14. Please list all meetings among Kris Kobach, Michael Pence, or Donald Trump related to the creation or operation of the Presidential Advisory Commission on Election Integrity.

15. Please explain in detail all steps taken by or on behalf of the Presidential Advisory Commission on Election Integrity to make documents collected by the Presidential Advisory Commission on Election Integrity available to its Commission members and to the public at large.

Dated: November 13, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 13, 2017, I electronically served the foregoing document to the listed recipients via email.

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