

SIXTEENTH JUDICIAL DISTRICT COURT
PARISH OF ST. MARTIN, STATE OF LOUISIANA

NUMBER: 89811

DIVISION: D

STATE OF LOUISIANA, THROUGH
JEFF LANDRY, IN HIS OFFICIAL CAPACITY
AS ATTORNEY GENERAL OF THE STATE

VERSUS

CENTER FOR TECH AND CIVIC LIFE, NEW VENTURE FUND,
D/B/A CENTER FOR SECURE AND MODERN ELECTIONS,
DAWN MAISAL COLE AND FULL CIRCLE STRATEGIES, LLC

PETITION FOR PERMANENT INJUNCTION AND DECLARATORY JUDGMENT
ON BEHALF OF THE STATE OF LOUISIANA

The Petition of the STATE OF LOUISIANA, appearing through JEFF LANDRY, in his official capacity as Attorney General and chief legal officer of the State of Louisiana, domiciled in East Baton Rouge Parish, Louisiana, respectfully represents:

1.

The Attorney General brings this suit on behalf of the State of Louisiana pursuant to La. Const. Art. IV, § 8 to prevent the injection of unregulated private money into the Louisiana election system and to protect the integrity of elections in the State by ensuring against the corrosive influence of outside money on Louisiana election officials.

2.

Made defendants are:

- A. CENTER FOR TECHNOLOGY AND CIVIC LIFE, (CTCL) upon information and belief a non-profit corporation domiciled and with its principal place of business in the State of Illinois that has not appointed an agent for service of process in Louisiana but has engaged in business in the State in connection with elections scheduled for November 3, 2020;
- B. NEW VENTURE FUND, a non-profit corporation domiciled and with its principal place of business in Washington, DC, operating under the trade name Center for Secure and Modern Elections (CSME) in the State of Louisiana that has not appointed an agency for service of process in the state but has engaged in business in the State in connection with elections scheduled for November 3, 2020;
- C. DAWN MAISEL COLE, a person of the age of majority domiciled in St. Martin Parish, Louisiana who at all times pertinent hereto acted as *de facto* agent for CTCL and New Venture Fund.

D. FULL CIRCLE STRATEGIES, LLC, a domestic limited liability company domiciled and with its registered office in St. Martin Parish, Louisiana who at all times pertinent hereto acted as *de facto* agent for CTCL and New Venture Fund.

3.

CTCL is a non-profit corporation based in Chicago, Illinois that accepts contributions and distributes monies to election officials and jurisdictions.

4.

Its website touts a recent \$250 million contribution that it intends to distribute by way of “grants” to election officials and jurisdictions in connection with the upcoming presidential election.

The Center for Tech and Civic Life (CTCL) is excited to expand our COVID-19 Response Grant program to all U.S. local election jurisdictions. Backed by a generous \$250M contribution, CTCL will provide grants to local election jurisdictions across the country to help ensure you have the staffing, training, and equipment necessary so this November every eligible voter can participate in a safe and timely way and have their vote counted.

5.

The New Venture Fund, operating in Louisiana under the trade name Center for Secure and Modern Elections (CSME), partnered with CTCL to solicit applications and information from Louisiana officials in connection with the proposed grants.

6.

CTCL and CSME worked their grant scheme in the State of Louisiana through a lobbyist by the name of Dawn Maisel Cole, owner and operation of Full Circle Strategies, LLC, as their Louisiana representative and agent to target registrars of voters, clerks of court and local election officials.

7.

The scheme targeted 13 parishes, some to receive contributions of *more than \$500,000*, accompanied by a request for detailed information about the operations, conduct and expenses of the registrar’s/clerk’s offices. See, Exhibit A, solicitation from Dawn Cole, attached.

8.

The application for the subject grants captures information from each official applying for a grant including:

You will need to provide the following information in your grant application:

- Number of active registered voters in the election office jurisdiction as of September 1, 2020
- Number of full-time staff (or equivalent) on the election team as of September 1, 2020
- Election office 2020 budget as of September 1, 2020

- Election office W-9
- Local government body who needs to approve the grant funding (if any)
- What government official or government agency the grant agreement should be addressed to.

9.

The “grant” also requires the applicant to execute an agreement dictating terms, conditions, limitations and reimbursement requirements in connection with the expenditure of funds that are the subject of the grant.

10.

The grant further requires that the recipient provide a written report detailing the election official’s expenditures in connection with the grant amounting to an “information grab” about the operations and expenses of the recipient’s office.

11.

Ms. Cole directly solicited registrars and clerks of court to accept contributions from CTCL and New Venture for the operation of their respective offices in the manner reflected in Exhibit A.

12.

Private contributions to local election officials are unlawful and contrary to the methods for election funding established by law in the State of Louisiana, and such contributions by these defendants should be declared illegal and permanently enjoined.

13.

The time, place and manner of holding elections in Louisiana is established by the State subject to regulations set by Congress in accordance with Article I, Section 4, Clause 1 of the U.S. Constitution and La. Const. arts. I, § 26, and XI, § 1 thus making the administration of elections the exclusive province of state and federal governments.

14.

Federal and state laws provide comprehensively and exclusively for the funding of elections and election costs in La. R.S. 18:1400.1 - 1400.8, 1400.21; 29 USC 20901, *et seq.* (HAVA); 15 USC 9041, *et seq.* (CARES ACT) and related statutes which preempt and preclude the use of private money to fund elections in the State of Louisiana.

15.

Louisiana has seen fit to fund and pay expenses incurred by local election officials, particularly registrars of voters and clerks of court, through the Secretary of State, parishes, municipalities or other local entities that call an election as required by La. R.S. 1400.1 – 1400.8.

16.

Federal funds that arrive through HAVA are deposited in a special account in the Treasurer's office, referred to as the Help Louisiana Vote Fund, to be allocated and administered by the Secretary of State and the Treasurer as required by La. R.S. 1400.21.

17.

The statutes nowhere provide for the receipt or expenditure of private funds by registrars or clerks of court except as administered and paid by the Secretary of State and parish, municipal or other local governing authority in connection with elections.

18.

The reasons that the Louisiana Legislature and U.S. Congress exclude private funding sources for local elections are obvious enough:

- a. The influence that would inevitably accompany private financial contributions to local election officials;
- b. Outside donations to local election officials sow distrust in the administration of the election system;
- c. Private contributions would inevitably spawn competition for party and corporate control over local election funding and would lead to bidding for election favor by party and private interests;
- d. Private contributors are likely to be political parties or large corporations that have partisan and/or economic objectives to foster with their contributions to election officials;
- e. Private interests, as in this instance, fund particular parishes and particular aspects of the election that they believe advance their election goals and objectives;
- f. Should registrars and clerks become reliant upon private funding of their governmental activities, they may well be compelled to respond to the objectives of those providing the funding in order to ensure that the funding continues;

- g. Such private funding, washed through non-profit organizations, invites the potential for contributions from foreign governments to the Louisiana system and its election officials;
- h. Private contributions open the door to election suits and contests based upon perceived or actual influence on the part of local election officials in the conduct of an election.

19.

It has been the longstanding policy of the State of Louisiana to prevent, in the interest of free and fair elections, the introduction of unregulated and unlimited money in the context of candidate contributions that may create the appearance if not the actuality of corruption.

L. (1) The legislature recognizes that it is essential to the operation of effective democratic government in this state that citizens have confidence in the electoral process and that elections be conducted so as to prevent influence and the appearance of influence of candidates for public office and of the election process by special interests, particularly by persons substantially interested in the gaming industry in this state.

La. R.S. 18:1505.2.

20.

Louisiana courts have similarly recognized the State's interest in preventing the insidious and corrupting effect of money on the political system in the context of candidate fundraising.

The primary interest served by the limitations contained in the CFDA, and indeed, by the CFDA as a whole, is the prevention of actual or perceived corruption spawned by the real or imagined coercive influence of large financial contributions on candidates' positions and on their subsequent actions if elected to office.

State Through Bd. of Ethics for Elected Officials as Supervisory Comm. on Campaign Fin. Disclosure v. Duke, 94-0398 (La. App. 1 Cir. 4/7/95), 658 So. 2d 1276, 1290, as amended on reh'g (Aug. 4, 1995).

21.

Funding elections through even-handed government administrators acting in the interest of all voters is an imperative of free and fair elections, and elections must remain untainted by money from private sources with private economic or political interests.

22.

Contributions to select officials and jurisdictions skews election funding and favors some local jurisdictions over others resulting in the unequal and inequitable treatment of voters.

23.

Louisiana has a compelling interest in maintaining a free and fair election system untainted by party and corporate money.

24.

Whether the defendants here may be well-intentioned, private money in any amount, but particularly the amount of money offered by the defendants to select clerks and/or registrars, has an inherently insidious and corrupting effect.

25.

At a minimum the appearance of influence buying is inescapable and would undermine the integrity and public trust in elections and in all respects runs counter to the U.S. and Louisiana Constitutions as well as state and federal statutes providing for the funding of Louisiana elections.

26.

The financial contribution scheme advanced by these defendants is contrary to law and would result in irreparable harm to the State of Louisiana, its election officials and voters, and the contributions should be enjoined.

27.

Moreover, the State is entitled to a declaration by the courts that private contributions to local election officials and the election system in general are unlawful and contrary to Louisiana law.

WHEREFORE, the State of Louisiana, through the Attorney General prays that after due proceedings had, there be judgment in their favor and against the defendants, Center for Tech and Civil Life (CTCL), New Venture Fund d/b/a Center for Secure and Modern Elections, Dawn Maisel Cole, and Full Circle Strategies, LLC, as follows:

1. That a declaratory judgment issue declaring that funding contributions from the defendants as private sources of election funding is contrary to law and is impermissible under the Louisiana election funding laws; and
2. That a permanent injunction issue prohibiting the defendants from making, offering, advertising, proposing or in any other manner seeking to introduce or issue grants, contributions, donations or other funds into the Louisiana election system.

JEFF LANDRY
ATTORNEY GENERAL

BY:



Carey T. Jones (LSBA #07474)
David Jeddie Smith (LSBA #27089)
Ryan Montegut (LSBA #30363)
Jeffrey M. Wale (LSBA #36070)
Assistant Attorneys General
Louisiana Department of Justice, Civil Division
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Email: jonescar@ag.louisiana.gov
smithda@ag.louisiana.gov
montegutr@ag.louisiana.gov
walej@ag.louisiana.gov

Please Serve:

CENTER FOR TECH AND CIVIC LIFE
Through its de facto agent in the State,
Dawn Maisel Cole
1044 Angelwood Drive
Breaux Bridge, Louisiana 70517

-and-

Through the Louisiana Secretary of State
8585 Archives Avenue
Baton Rouge, Louisiana 70809

NEW VENTURE FUND, D/B/A CENTER FOR SECURE AND MODERN ELECTIONS
Through its de facto agent in the State,
Dawn Maisel Cole
1044 Angelwood Drive
Breaux Bridge, Louisiana 70517

-and-

Through the Louisiana Secretary of State
8585 Archives Avenue
Baton Rouge, Louisiana 70809

DAWN MAISEL COLE
Dawn Maisel Cole
1044 Angelwood Drive
Breaux Bridge, Louisiana 70517

FULL CIRCLE STRATEGIES, LLC
Through its agent for service of process
Dawn Maisel Cole
1044 Angelwood Drive
Breaux Bridge, Louisiana 70517

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2020 OCT -2 PM 2: 51

DEPUTY CLERK OF COURT
ST. MARTIN PARISH

SIXTEENTH JUDICIAL DISTRICT COURT
PARISH OF ST. MARTIN, STATE OF LOUISIANA

NUMBER:

DIVISION:

STATE OF LOUISIANA, THROUGH
JEFF LANDRY, IN HIS OFFICIAL CAPACITY
AS ATTORNEY GENERAL OF THE STATE

From: Dawn Cole <dawn@fullcirclelouisiana.com>
Sent: Monday, September 21, 2020 3:57 PM
To: Mike Spence <Mike.Spence@caddoclerk.com>
Subject: Fwd: Important CTCL Grant Opportunity

CAUTION: This email originated from outside of the **Caddo Parish Clerk of Court's Office**. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Spence,

Thank you for taking my call this afternoon. As we discussed, 13 of Louisiana's 64 parishes were prioritized to receive over \$500,000 per parish through the CTCL grant. Caddo Parish is on the Priority List and is eligible for more than the basic amount based on population and election needs!

In addition to completing the online application (<https://www.techandciviclife.org/our-work/election-officials/grants/>), your office is asked to complete the attached 3-page Safe Voting questionnaire and return to me via email once completed. The Center will consider the information provided when evaluating and granting funds.

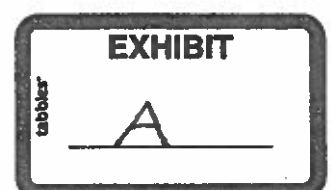
I am here to assist so please don't hesitate in contacting me if you have any questions. I am excited about this wonderful opportunity!

Dawn Maisel Cole

Full Circle Strategies, LLC

337.288.5007 | dawn@fullcirclelouisiana.com

www.fullcirclelouisiana.com



REQUEST FOR ADMISSION NO. 2:

Please admit that you authored Exhibit A.

REQUEST FOR ADMISSION NO. 3:

Please admit that you directed Exhibit A to the Caddo Parish Clerk of Court.

REQUEST FOR ADMISSION NO. 4:

Please admit that you were acting on behalf of the Center for Tech and Civic Life, LLC (CTCL) in composing and sending Exhibit A to the Caddo Parish Clerk of Court.

REQUEST FOR ADMISSION NO. 5:

Please admit that you entered into a contract with CTCL to aid in distributing grants to Louisiana certain election officials.

REQUEST FOR ADMISSION NO. 6:

Please admit that the grants to certain Louisiana election officials referenced in the immediately preceding Request for Admission were to be distributed in the time period August to December, 2020.

REQUEST FOR ADMISSION NO. 7:

Please admit that 13 parishes were selected to receive offers of grant funds from CTCL in excess of \$5,000 each.

REQUEST FOR ADMISSION NO. 8:

Please admit that you are domiciled in St. Martin Parish, Louisiana.

INTERROGATORIES

The Responding Party must answer, separately and fully in writing under oath, the following interrogatories. If any interrogatory is objected to, the Responding Party shall state the reason(s) for objecting. The person answering the interrogatories must sign them and shall verify that he or she has read and confirmed the answers and objections. The answers, and objections if any, to the interrogatories must be served on Plaintiff's counsel within 30 days after the service of these interrogatories.

INTERROGATORY NO. 1:

Please state your full name and residence address.

INTERROGATORY NO. 2:

Please describe your relationship with Full Circle Strategies, LLC.

INTERROGATORY NO. 3:

Please describe your relationship with the Center for Tech and Civic Life (CTCL), with New Venture Fund and/or with Center for Secure and Modern Elections, and provide the following information with respect to each entity:

- a) The date of your first contact with any and all of the three entities;
- b) The names and addresses of any and all representatives of each entity with whom you had contact or communications in 2020.
- c) The date(s) of each and every contact or communication between you and each of the three entities.

INTERROGATORY NO. 4:

Please describe any and all work you have performed on behalf of CTCL, on behalf of New Venture Fund and/or on behalf of Center for Secure and Modern Elections, and provide the following information with respect to each entity:

- a) The date any and all such work was performed;
- b) The nature of the work performed;
- c) The purpose or objective of the work;
- d) How much money you have been paid or expect to be paid in connection with such work;
- e) How the amount of money you have been paid or expect to be paid was calculated.

INTERROGATORY NO. 5:

With respect to the 13 parishes referenced in Exhibit A, please identify each and every parish and the basis upon which each and every such parish was selected.

INTERROGATORY NO. 6:

Please describe the criteria used to determine the amount of the grant(s) to be awarded to the 13 parishes referenced in Exhibit A.

INTERROGATORY NO. 7:

Please give the total number of grant applications received from applicants in the State of Louisiana in connection with the aforementioned CTCL grants.

INTERROGATORY NO. 8:

Please identify each and every such grant applicant from whom an application was received.

REQUESTS FOR PRODUCTION OF DOCUMENTS

The Responding Party must produce, by serving on Plaintiff's counsel the documents and things, whether paper, electronic or other, requested below. The documents and things requested are to be served within 30 days of the service of these requests for production. In lieu of providing the documents and things, the Responding Party may elect to make available for inspection and copying such documents as are responsive to the requests within 30 days of service at a place within the jurisdiction of the court and on a date and time to be agreed upon by the parties.

REQUEST FOR PRODUCTION NO. 1:

Produce a copy of any and all documents of any kind or nature that in any way relate to the transaction(s), occurrence(s), and event(s) that form the subject matter of this suit.

REQUEST FOR PRODUCTION NO. 2:

Please provide a copy of any and all contracts that you and/or Full Circle Strategies, LLC have entered into with CTCL, New Venture Fund and/or Center for Secure and Modern Elections.

REQUEST FOR PRODUCTION NO. 3:

Please provide a copy of any and all documents reflecting compensation, salary, or other benefit that you have received or expect to receive from CTCL, New Venture Fund and/or Center for Secure and Modern Elections.

REQUEST FOR PRODUCTION NO. 4:

Please provide a copy of any and all emails, correspondence, letters, texts and/or written communications of any kind or nature between you and any state or local official or office, agency head, clerk of court, parish government, municipal government, registrar of voters and/or local governing authority in any way relating to grants or funding issued or to be issued by CTCL, New Venture Fund and/or Center for Secure and Modern Elections.

REQUEST FOR PRODUCTION NO. 5:

Please provide a copy of any notes, log book entries, memoranda or recording of any kind or nature reflecting contacts, communications and/or conversations that you had with CTCL, New Venture Fund, Center for Secure and Modern Elections and/or any representative or

employee thereof concerning election related grants or donations to Louisiana clerks of court, registrars of voters or any other entity in any way involved in the Louisiana election process between the January 1, 2020 to the present.

REQUEST FOR PRODUCTION NO. 6:

Please provide a copy of any notes, log book entries, memoranda or recording of any kind or nature reflecting contacts, communications and/or conversations that you had with any and all Louisiana clerks of court, registrars of voters, public entity, public official and/or any representative or employee thereof concerning election related grants or donations to Louisiana entities in any way involved in the Louisiana election process between the January 1, 2020 to the present.

REQUEST FOR PRODUCTION NO. 7:

Please provide a copy of any and all emails, letters, texts or written communications of any kind or nature between you and any clerk of court, registrar of voters and/or parish and state official and/or any representative or employee thereof in any way related to the subject matter of this suit.

REQUEST FOR PRODUCTION NO. 8:

Please provide a copy of any document or communication related to the marketing, targeting, focusing, prioritizing or strategy for the placement of grants or donations with any Louisiana clerk of court, registrar of voters or public official.

REQUEST FOR PRODUCTION NO. 9:

Please provide a copy of any document or communication reflecting or relating to the source(s) of the grants, donations or funds offered or advertised to any Louisiana clerk of court, registrar of voters or public official.

REQUEST FOR PRODUCTION NO. 10:

Please provide a copy of any document or communication related to grants, donations or funds offered, advertised or distributed to public entities or officials in states other than Louisiana.

These discovery requests are continuing and must be supplemented as additional information and documents that are responsive to the discovery requests are identified or discovered.

JEFF LANDRY
ATTORNEY GENERAL

BY:



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David Jeddie Smith (LSBA #27089)
Ryan Montegut (LSBA #30363)
Jeffrey M. Wale (LSBA #36070)
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Email: jonescar@ag.louisiana.gov
smithda@ag.louisiana.gov
montegutr@ag.louisiana.gov
walej@ag.louisiana.gov

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2020 OCT -2 PM 2: 51

DEPUTY CLERK
ST. MARTIN PARISH

SIXTEENTH JUDICIAL DISTRICT COURT
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AS ATTORNEY GENERAL OF THE STATE

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In addition to completing the online application (<https://www.lechanciviclife.org/our-work/election-officials/grants>), your office is asked to complete the attached 3-page Safe Voting questionnaire and return to me via email once completed. The Center will consider the information provided when evaluating and granting funds.

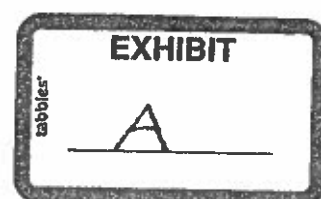
I am here to assist so please don't hesitate in contacting me if you have any questions. I am excited about this wonderful opportunity!

Dawn Maisel Cole

Full Circle Strategies, LLC

337.288.5007 | dawn@fullcirclelouisiana.com

www.fullcirclelouisiana.com



REQUEST FOR ADMISSION NO. 1:

Please admit the authenticity of Exhibit A hereto.

REQUEST FOR ADMISSION NO. 2:

Please admit that Dawn Cole authored Exhibit A.

REQUEST FOR ADMISSION NO. 3:

Please admit that Dawn Cole directed Exhibit A to the Caddo Parish Clerk of Court.

REQUEST FOR ADMISSION NO. 4:

Please admit that you entered into a contract with CTCL to aid in distributing grants to Louisiana certain election officials.

REQUEST FOR ADMISSION NO. 6:

Please admit that the grants to certain Louisiana election officials referenced in the immediately preceding Request for Admission were to be distributed in the time period August to December, 2020.

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INTERROGATORIES

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INTERROGATORY NO. 1:

Please give your full name and business address.

INTERROGATORY NO. 2:

Please describe your relationship with Dawn Maisel Cole.

INTERROGATORY NO. 3:

Please describe your relationship with the Center for Tech and Civic Life (CTCL), with New Venture Fund and/or with Center for Secure and Modern Elections, and provide the following information with respect to each entity:

- a) The date of your first contact with any and all of the three entities;
- b) The names and addresses of any and all representatives or employees of each entity with whom you had contact or communications in 2020.
- c) The date(s) of each and every contact or communication between you and each of the three entities.

INTERROGATORY NO. 4:

Please describe any and all work you have performed on behalf of CTCL, on behalf of New Venture Fund and/or on behalf of Center for Secure and Modern Elections, and provide the following information with respect to each entity:

- a) The date any and all such work was performed;
- b) The nature of the work performed;
- c) The purpose or objective of the work;
- d) How much money you have been paid or expect to be paid in connection with such work;
- e) How the amount of money you have been paid or expect to be paid was calculated.

INTERROGATORY NO. 5:

With respect to the 13 parishes referenced in Exhibit A, please identify each and every parish and the basis upon which each and every such parish was selected.

INTERROGATORY NO. 6:

Please describe the criteria used to determine the amount of the grant(s) to be awarded to the 13 parishes referenced in Exhibit A.

INTERROGATORY NO. 7:

Please describe any and all communications you have had with and Louisiana public official or office, including but not limited to the Secretary of State, clerks of court, registrars of voters, local governing authorities and/or any representative or employee thereof in any way relating to grants for Louisiana elections, and provide the following information with respect

thereto:

- a) The date of the communication;
- b) The name and address of the person with whom you communicated;
- c) The subject and nature of the communication.

INTERROGATORY NO. 8:

Please identify any and all persons with whom you worked, collaborated, coordinated with, communicated with and/or contracted with in connection with grants or donations proposed, offered or advertised to Louisiana state and local election officials or offices by CTCL, New Venture Fund and/or Center for Secure and Modern Elections from January 1, 2020 to the present.

REQUESTS FOR PRODUCTION OF DOCUMENTS

The Responding Party must produce, by serving on Plaintiff's counsel the documents and things, whether paper, electronic or other, requested below. The documents and things requested are to be served within 30 days of the service of these requests for production. In lieu of providing the documents and things, the Responding Party may elect to make available for inspection and copying such documents as are responsive to the requests within 30 days of service at a place within the jurisdiction of the court and on a date and time to be agreed upon by the parties.

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REQUEST FOR PRODUCTION NO. 5:

Please provide a copy of any notes, log book entries, memoranda or recording of any kind or nature reflecting contacts, communications and/or conversations that you had with CTCL, New Venture Fund, Center for Secure and Modern Elections and/or any representative or employee thereof concerning election related grants or donations to Louisiana clerks of court, registrars of voters or any other entity in any way involved in the Louisiana election process between the January 1, 2020 to the present.

REQUEST FOR PRODUCTION NO. 6:

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REQUEST FOR PRODUCTION NO. 9:

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REQUEST FOR PRODUCTION NO. 10:

Please provide a copy of any document or communication related to grants, donations or

funds offered, advertised or distributed to public entities or officials in states other than Louisiana.


REQUEST FOR PRODUCTION NO. 11:

Please provide a copy of any and all documents and communications in any form received from CTCL, New Venture Fund, Center for Secure and Modern Elections and/or any representative or employee thereof concerning election related grants or donations to Louisiana clerks of court, registrars of voters or any other entity in any way involved in the Louisiana election process between the January 1, 2020 to the present.

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ATTORNEY GENERAL

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DEPUTY CLERK OF COURT
ST. MARTIN PARISH

SIXTEENTH JUDICIAL DISTRICT COURT
PARISH OF ST. MARTIN, STATE OF LOUISIANA

NUMBER:

DIVISION:

STATE OF LOUISIANA, THROUGH
JEFF LANDRY, IN HIS OFFICIAL CAPACITY
AS ATTORNEY GENERAL OF THE STATE

From: Dawn Cole <dawn@fullcirclelouisiana.com>
Sent: Monday, September 21, 2020 3:57 PM
To: Mike Spence <Mike.Spence@caddoclerk.com>
Subject: Fwd: Important CTCL Grant Opportunity

CAUTION: This email originated from outside of the Caddo Parish Clerk of Court's Office. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Spence,

Thank you for taking my call this afternoon. As we discussed, 13 of Louisiana's 64 parishes were prioritized to receive over \$500,000 per parish through the CTCL grant. Caddo Parish is on the Priority List and is eligible for more than the basic amount based on population and election needs!

In addition to completing the online application (<https://www.lechandoivlife.org/our-work/election-officials/grants>), your office is asked to complete the attached 3-page Safe Voting questionnaire and return to me via email once completed. The Center will consider the information provided when evaluating and granting funds.

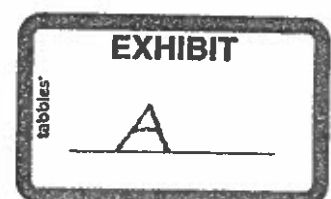
I am here to assist so please don't hesitate in contacting me if you have any questions. I am excited about this wonderful opportunity!

Dawn Maisel Cole

Full Circle Strategies, LLC

337.288.5007 | dawn@fullcirclelouisiana.com

www.fullcirclelouisiana.com



REQUEST FOR ADMISSION NO. 1:

Please admit that your business domicile is Chicago, Illinois.

REQUEST FOR ADMISSION NO. 2:

Please admit that you do not have a certificate of authority to transact business in the State of Louisiana.

REQUEST FOR ADMISSION NO. 3:

Please admit that between August 1, 2020 and the present you transacted business in the State of Louisiana.

REQUEST FOR ADMISSION NO. 4:

Please admit that you are not authorized to do business in the State of Louisiana.

REQUEST FOR ADMISSION NO. 5:

Please admit that you are not registered with the Secretary of State as a corporation in the State of Louisiana.

REQUEST FOR ADMISSION NO. 6:

Please admit that you have not designated an agent for service of process in the State of Louisiana.

REQUEST FOR ADMISSION NO. 7:

Please admit that you do not have any employee or officer in the State of Louisiana.

REQUEST FOR ADMISSION NO. 8:

Please admit that you proposed to distribute grant funds to local election officials in the State of Louisiana in connection with the November 3, 2020 presidential election.

REQUEST FOR ADMISSION NO. 9:

Please admit that you contracted with Dawn Maisel Cole to promote, solicit, offer and distribute grants for acceptance by Louisiana election officials, including registrars of voters and clerks of court.

REQUEST FOR ADMISSION NO. 10:

Please admit that Dawn Maisel Cole acted as your representative in Louisiana in connection with the promotion, solicitation and offers of grants to Louisiana election officials, including registrars of voters and clerks of court.

REQUEST FOR ADMISSION NO. 11:

Please admit that you entered into a contract with Full Circle Strategies, LLC to aid in

offering and distributing grants to Louisiana certain election officials.

REQUEST FOR ADMISSION NO. 12:

Please admit that grants to Louisiana election officials referenced in the foregoing Requests for Admission were to be distributed during the time period August to December, 2020.

REQUEST FOR ADMISSION NO. 13:

Please admit that you selected 13 parishes to receive offers of grant funds in excess of \$5,000 each in connection with the November 3, 2020 presidential election.

INTERROGATORIES

The Responding Party must answer, separately and fully in writing under oath, the following interrogatories. If any interrogatory is objected to, the Responding Party shall state the reason(s) for objecting. The person answering the interrogatories must sign them and shall verify that he or she has read and confirmed the answers and objections. The answers, and objections if any, to the interrogatories must be served on Plaintiff's counsel within 30 days after the service of these interrogatories.

INTERROGATORY NO. 1:

Please describe your relationship with Dawn Maisel Cole and Full Circle Strategies, LLC. and provide the following information with respect thereto:

- a) How, by whom and when was contact initiated between you and Dawn Maisel Cole and/or Full Circle Strategies;
- b) What was your reason for choosing Dawn Maisel Cole and/or Full Circle Strategies to pursue and facilitate grant transactions with Louisiana election officials;
- c) Provide the name and address of the person or persons who selected Dawn Maisel Cole and/or Full Circle Strategies in connection with the grant proposals and solicitations with Louisiana election officials.

INTERROGATORY NO. 2:

Please describe your legal and/or business relationship with New Venture Fund and/or with Center for Secure and Modern Elections.

INTERROGATORY NO. 3:

With respect to any and all grant funds proposed for distribution to Louisiana election officials, please provide the following information:

- a) the principal source of the funds for the proposed grants;
- b) the role and/or contribution that Facebook and/or Mark Zuckerberg played in the grant funding;
- c) how much money was proposed for distribution in Louisiana;
- d) which persons or entities were selected for the receipt of grants in Louisiana;
- e) which persons or entities were selected for the receipt of grants in excess of \$5,000 in the State of Louisiana;
- f) on what basis were each of the entities proposed to receive grants in Louisiana chosen?
- g) identify by name and address any and all persons who participated or advised you in the selection of grant recipients;
- h) give the reason that some recipients were to receive more grant money than others.

INTERROGATORY NO. 4:

With respect to the 13 parishes referenced in the immediately preceding interrogatory, please identify each and every parish and the basis upon which each and every such parish was selected.

INTERROGATORY NO. 5:

Please describe the criteria used to determine the amount of the grant(s) to be awarded to the 13 parishes selected to receive grants in excess of \$5,000.

INTERROGATORY NO. 6:

Please describe any and all communications you have had with any Louisiana public official or office, including but not limited to the Secretary of State, clerks of court, registrars of voters, local governing authorities and/or any representative or employee thereof in any way relating to grants for Louisiana elections, and provide the following information with respect thereto:

- a) The date of the communication;
- b) The name and address of the person with whom you communicated;
- c) The subject and nature of the communication.

INTERROGATORY NO. 7:

Please identify any and all persons with whom you worked, collaborated, coordinated with, communicated with and/or contracted with in connection with grants or donations proposed, offered or advertised to Louisiana state and local election officials or offices by CTCL, New

Venture Fund and/or Center for Secure and Modern Elections from January 1, 2020 to the present.

INTERROGATORY NO. 8:

Please identify any and all donors to CTCL who made donations from January 1, 2020 to the present, and provide the following information with respect thereto:

- a) the date of any and all communications between you and the donors;
- b) the name and address of any and all persons employed by or acting on behalf of CTCL who communicated with the donors;
- c) whether emails, correspondence, texts or written communications of any kind or nature were sent by you to the donors.

REQUESTS FOR PRODUCTION OF DOCUMENTS

The Responding Party must produce, by serving on Plaintiff's counsel the documents and things, whether paper, electronic or other, requested below. The documents and things requested are to be served within 30 days of the service of these requests for production. In lieu of providing the documents and things, the Responding Party may elect to make available for inspection and copying such documents as are responsive to the requests within 30 days of service at a place within the jurisdiction of the court and on a date and time to be agreed upon by the parties.

REQUEST FOR PRODUCTION NO. 1:

Produce a copy of any and all documents of any kind or nature that in any way relate to the transaction(s), occurrence(s), and event(s) that form the subject matter of this suit.

REQUEST FOR PRODUCTION NO. 2:

Please provide a copy of any and all contracts that you and Dawn Maisel Cole and/or Full Circle Strategies, LLC have entered into in connection with the grant funding referenced herein.

REQUEST FOR PRODUCTION NO. 3:

Please provide a copy of any and all documents reflecting compensation, salary, payment or other benefit to Dawn Maisel Cole and/or Full Circle Strategies.

REQUEST FOR PRODUCTION NO. 4:

Please provide a copy of any and all emails, correspondence, letters, texts and/or written communications of any kind or nature between you and any state or local official or office, agency head, clerk of court, parish government, municipal government, registrar of voters and/or local governing authority in any way relating to grants or funding issued or to be issued by CTCL, New

Venture Fund and/or Center for Secure and Modern Elections.

REQUEST FOR PRODUCTION NO. 5:

Please provide a copy of any notes, log book entries, memoranda or recording of any kind or nature reflecting contacts, communications and/or conversations that you had with New Venture Fund, Center for Secure and Modern Elections, Dawn Maisel Cole, Full Circle Strategies and/or any representative or employee thereof concerning election related grants or donations to Louisiana clerks of court, registrars of voters or any other entity in any way involved in the Louisiana election process between the January 1, 2020 to the present.

REQUEST FOR PRODUCTION NO. 6:

Please provide a copy of any notes, log book entries, memoranda or recording of any kind or nature reflecting contacts, communications and/or conversations that you had with any and all Louisiana clerks of court, registrars of voters, public entity, public official and/or any representative or employee thereof concerning election related grants or donations to Louisiana entities in any way involved in the Louisiana election process between the January 1, 2020 to the present.

REQUEST FOR PRODUCTION NO. 7:

Please provide a copy of any and all emails, letters, texts or written communications of any kind or nature between you and any Louisiana election official, clerk of court, registrar of voters and/or parish and state official and/or any representative or employee thereof in any way related to the subject matter of this suit.

REQUEST FOR PRODUCTION NO. 8:

Please provide a copy of any and all documents or communications related to the marketing, targeting, focusing, prioritizing or strategy for the placement of grants or donations with any Louisiana clerk of court, registrar of voters or public official.

REQUEST FOR PRODUCTION NO. 9:

Please provide a copy of any document or communication reflecting or relating to the source(s) of the grants, donations or funds offered or advertised to any Louisiana clerk of court, registrar of voters, local governing authority or public official.

REQUEST FOR PRODUCTION NO. 10:

Please provide a copy of any document or communication related to grants, donations or funds offered, advertised or distributed to public entities or officials in states other than Louisiana

in connection with the presidential election of November 3, 2020.

REQUEST FOR PRODUCTION NO. 11:

Please provide a copy of any and all documents and communications in any form that you received from New Venture Fund, Center for Secure and Modern Elections, Dawn Maisel Cole and/or any representative or employee thereof concerning election related grants or donations to Louisiana clerks of court, registrars of voters or any other entity in any way involved in the Louisiana election process between the January 1, 2020 to the present.

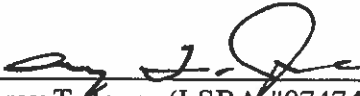
REQUEST FOR PRODUCTION NO. 12:

Please produce any and all documents of any kind or nature that you prepared, that was prepared by others and/or that you received in connection with or in any way related to the grant funding referenced in these requests and the petition filed herein.

These discovery requests are continuing and must be supplemented as additional information and documents that are responsive to the discovery requests are identified or discovered.

JEFF LANDRY
ATTORNEY GENERAL

BY:



Carey T. Jones (LSBA #07474)
David Jeddie Smith (LSBA #27089)
Ryan Montegut (LSBA #30363)
Jeffrey M. Wale (LSBA #36070)
Assistant Attorneys General
Louisiana Department of Justice, Civil Division
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Facsimile: (225) 326-6098
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smithda@ag.louisiana.gov
montegutr@ag.louisiana.gov
walej@ag.louisiana.gov

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2020 OCT -2 PM 2: 51

DEPUTY CLERK OF COURT
ST. MARTIN PARISH

SIXTEENTH JUDICIAL DISTRICT COURT
PARISH OF ST. MARTIN, STATE OF LOUISIANA

NUMBER:

DIVISION:

STATE OF LOUISIANA, THROUGH
JEFF LANDRY, IN HIS OFFICIAL CAPACITY
AS ATTORNEY GENERAL OF THE STATE

VERSUS

CENTER FOR TECH AND CIVIC LIFE NEW VENTURE FUND,
D/B/A CENTER FOR SECURE AND MODERN ELECTIONS,
DAWN MAISAL COLE AND FULL CIRCLE STRATEGIES, LLC

FIRST REQUEST FOR ADMISSIONS, INTERROGATORIES, AND REQUESTS FOR
PRODUCTION OF DOCUMENTS BY THE ATTORNEY GENERAL TO THE CENTER
FOR NEW VENTURE FUND D/B/A CENTER FOR SECURE AND
MODERN ELECTIONS (CSME)

PROPOUNDING PARTY: Plaintiff, Jeff Landry, Louisiana Attorney General

RESPONDING PARTY: Defendant, New Venture Fund d/b/a CSME

SERVICE: Please serve with the Petition

Pursuant to Rules 1467-1468, 1457-1458, and 1461-1463 of the Louisiana Code of Civil Procedure, Plaintiff, Jeff Landry, hereby requests that Defendant, New Venture Fund, respond to the Request for Admissions, Interrogatories, and Requests for Production of Documents propounded below as they relate to the transaction, occurrences, and events sued upon herein.

REQUEST FOR ADMISSIONS

Within 30 days after service of this request, the New Venture Fund, as the Responding Party must serve on Plaintiff's counsel a written answer or objection to each and every request for admission. The admissions must be signed by the Responding Party or its attorney. For each request for admission, the Responding Party shall admit or deny the statement or explain in detail why it cannot truthfully be admitted or denied. A denial must fairly meet the substance of the requested admission, and when good faith requires that the Responding Party qualify her answer or deny only a part of the matter, she shall specify so much of the request for admission as is true and qualify or deny the remainder. If objection is made to any request for admission, the reason for the objection shall be stated.

REQUEST FOR ADMISSION NO. 1:

Please admit that your business domicile is Washington, D.C. (If not, please provide your business domicile).

REQUEST FOR ADMISSION NO.2:

Please admit that you do not have a certificate of authority to transact business in the State of Louisiana.

REQUEST FOR ADMISSION NO. 3:

Please admit that between August 1, 2020 and the present you transacted business in the State of Louisiana under the name of the Center for Secure and Modern Elections.

REQUEST FOR ADMISSION NO. 4:

Please admit that you are not authorized to do business in the State of Louisiana.

REQUEST FOR ADMISSION NO. 5:

Please admit that you are not registered with the Secretary of State as a corporation in the State of Louisiana.

REQUEST FOR ADMISSION NO. 6:

Please admit that you have not designated an agent for service of process in the State of Louisiana.

REQUEST FOR ADMISSION NO. 7:

Please admit that you do not have any employee or officer in the State of Louisiana.

REQUEST FOR ADMISSION NO. 8:

Please admit that you proposed to distribute grant funds to local election officials in the State of Louisiana in connection with the November 3, 2020 presidential election.

REQUEST FOR ADMISSION NO. 9:

Please admit that you contracted with Dawn Maisel Cole to promote, solicit, offer and distribute grants for acceptance by Louisiana election officials, including registrars of voters and clerks of court.

REQUEST FOR ADMISSION NO. 10:

Please admit that Dawn Maisel Cole acted as your representative in Louisiana in connection with the promotion, solicitation and offers of grants to Louisiana election officials, including registrars of voters and clerks of court.

REQUEST FOR ADMISSION NO. 11:

Please admit that you entered into a contract with Full Circle Strategies, LLC to aid in offering and distributing grants to Louisiana certain election officials.

REQUEST FOR ADMISSION NO. 12:

Please admit that grants to Louisiana election officials referenced in the foregoing Requests for Admission were to be distributed during the time period August to December, 2020.

REQUEST FOR ADMISSION NO. 13:

Please admit that you selected 13 parishes to receive offers of grant funds in excess of \$5,000 each in connection with the November 3, 2020 presidential election.

INTERROGATORIES

The Responding Party must answer, separately and fully in writing under oath, the following interrogatories. If any interrogatory is objected to, the Responding Party shall state the reason(s) for objecting. The person answering the interrogatories must sign them and shall verify that he or she has read and confirmed the answers and objections. The answers, and objections if any, to the interrogatories must be served on Plaintiff's counsel within 30 days after the service of these interrogatories.

INTERROGATORY NO. 1:

Please describe your business and legal relationship with Dawn Maisel Cole and Full Circle Strategies, LLC., with the Center of Tech and Civic Life, with the Center for Secure and Modern Elections.

INTERROGATORY NO. 2:

With respect to any and all grant funds proposed for distribution to Louisiana election officials, please provide the following information:

- a) your role in the proposed distribution of any and all such grants;
- b) the principal source of the funds for the proposed grants;
- c) the role and/or contribution that Facebook and/or Mark Zuckerberg played in the grant funding;
- d) how much money was proposed for distribution in Louisiana;
- e) which persons or entities were selected for the receipt of grants in Louisiana;
- f) which persons or entities were selected for the receipt of grants in excess of \$5,000 in

the State of Louisiana;

- g) on what basis were each of the entities proposed to receive grants in Louisiana chosen?
- h) identify by name and address any and all persons who participated or advised you in the selection of grant recipients;
- i) give the reason that some recipients were to receive more grant money than others.

INTERROGATORY NO. 3:

Please describe any and all communications you have had with and Louisiana public official or office, including but not limited to the Secretary of State, clerks of court, registrars of voters, local governing authorities and/or any representative or employee thereof in any way relating to grants for Louisiana elections, and provide the following information with respect thereto:

- a) The date of the communication;
- b) The name and address of the person with whom you communicated;
- c) The subject matter and nature of the communication.

INTERROGATORY NO. 4:

Please identify any and all persons with whom you worked, collaborated, coordinated with, communicated with and/or contracted with in connection with grants or donations proposed, offered or advertised to Louisiana state and local election officials or offices by CTCL, New Venture Fund and/or Center for Secure and Modern Elections from January 1, 2020 to the present.

INTERROGATORY NO. 5:

Please identify any and all donors who made donations in excess of \$500,000 to you from January 1, 2020 to the present, and provide the following information with respect thereto:

- a) the date of any and all communications between you and the donors;
- b) the name and address of any and all persons employed by or acting on behalf of CTCL who communicated with the donors;
- c) whether emails, correspondence, texts or written communications of any kind or nature were sent by you to the donors.

REQUESTS FOR PRODUCTION OF DOCUMENTS

The Responding Party must produce, by serving on Plaintiff's counsel the documents and things, whether paper, electronic or other, requested below. The documents and things requested

are to be served within 30 days of the service of these requests for production. In lieu of providing the documents and things, the Responding Party may elect to make available for inspection and copying such documents as are responsive to the requests within 30 days of service at a place within the jurisdiction of the court and on a date and time to be agreed upon by the parties.

REQUEST FOR PRODUCTION NO. 1:

Produce a copy of any and all documents of any kind or nature that in any way relate to the transaction(s), occurrence(s), and event(s) that form the subject matter of this suit.

REQUEST FOR PRODUCTION NO. 2:

Please provide a copy of any and all contracts that you and/or Center for Tech and Civic Life, Center for Secure and Modern Elections, Dawn Maisel Cole and/or Full Circle Strategies, LLC have entered into in connection with the grant funding referenced herein.

REQUEST FOR PRODUCTION NO. 3:

Please provide a copy of any and all emails, correspondence, letters, texts and/or written communications of any kind or nature between you and any state or local official or office, agency head, clerk of court, parish government, municipal government, registrar of voters and/or local governing authority in any way relating to grants or funding issued or to be issued by CTCL, New Venture Fund and/or Center for Secure and Modern Elections.

REQUEST FOR PRODUCTION NO. 4:

Please provide a copy of any notes, log book entries, memoranda or recording of any kind or nature reflecting contacts, communications and/or conversations that you had with CTCL, Dawn Maisel Cole, Full Circle Strategies, LLC and/or any representative or employee thereof concerning election related grants or donations to Louisiana clerks of court, registrars of voters or any other entity in any way involved in the Louisiana election process between the January 1, 2020 to the present.

REQUEST FOR PRODUCTION NO. 5:

Please provide a copy of any notes, log book entries, memoranda or recording of any kind or nature reflecting contacts, communications and/or conversations that you had with any and all Louisiana clerks of court, registrars of voters, public entity, public official and/or any representative or employee thereof concerning election related grants or donations to Louisiana entities in any way involved in the Louisiana election process between the January 1, 2020 to the present.

REQUEST FOR PRODUCTION NO. 6:

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REQUEST FOR PRODUCTION NO. 7:

Please provide a copy of any and all documents or communications related to the marketing, targeting, focusing, prioritizing or strategy for the placement of grants or donations with any Louisiana clerk of court, registrar of voters or public official.

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Please provide a copy of any document or communication reflecting or relating to the source(s) of the grants, donations or funds offered or advertised to any Louisiana clerk of court, registrar of voters, local governing authority or public official.

REQUEST FOR PRODUCTION NO. 9:

Please provide a copy of any document or communication related to grants, donations or funds offered, advertised or distributed to public entities or officials in states other than Louisiana in connection with the presidential election of November 3, 2020.

REQUEST FOR PRODUCTION NO. 10:

Please provide a copy of any and all documents and communications in any form that you received from CTCL, Dawn Maisel Cole, Full Circle Strategies, LLC and/or any representative or employee thereof concerning election related grants or donations to Louisiana clerks of court, registrars of voters or any other entity in any way involved in the Louisiana election process between the January 1, 2020 to the present.

REQUEST FOR PRODUCTION NO. 11:

Please produce any and all documents of any kind or nature that you prepared, that was prepared by others and/or that you received in connection with or in any way related to the grant funding referenced in these requests and the petition filed herein.

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JEFF LANDRY
ATTORNEY GENERAL

BY:



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2020 OCT -2 PM 2: 51

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