



December 23, 2019

**VIA ELECTRONIC MAIL**

Director, Office of Open Government  
Executive Office of the Governor  
400 S. Monroe Street  
Tallahassee, FL 32399  
[desantis.opengov@eog.myflorida.com](mailto:desantis.opengov@eog.myflorida.com)

**Re: Public Records Request**

Dear Public Records Officer:

Pursuant to Florida’s public records laws, as codified at Fla. Stat. Chapter 119, American Oversight makes the following request for records.

**Requested Records**

American Oversight requests that the Office of the Governor promptly produce the following:

All email communications (including emails, complete email chains, email attachments, and calendar invitations) regardless of subject matter sent by (a) any of the officials or employees listed in Column A, below, to (b) any of the external individuals or entities listed in Column B, below, including but not limited to at the email addresses and domains specified:

Column A: Officials or Employees	Column B: External Individuals and Entities
<ul style="list-style-type: none"> <li>a. Governor Ron DeSantis, or anyone communicating on his behalf, such as assistants or schedulers</li> <li>b. Chief of Staff Shane Strum</li> <li>c. Lt. Governor Jeanette Nunez</li> <li>d. Chief of Staff Alex Garcia</li> <li>e. Deputy Chief of Staff James Blair</li> <li>f. Deputy Chief of Staff Adrian Lukis</li> <li>g. Executive Assistant Amelia Keaton</li> <li>h. General Counsel Joe Jacquot</li> <li>i. Executive Assistant Erin Kraeft</li> <li>j. Director of Communications Helen Aguirre Ferré</li> <li>k. Cabinet Affairs Director Beau Beaubien</li> </ul>	<ul style="list-style-type: none"> <li>a. Donald “Don” Trump Jr. (@trumporg.com)</li> <li>b. Eric Trump (@trumporg.com)</li> <li>c. Ivanka Trump (@ijkfamily.com, @ivankatrump.com, imt@who.eop.gov, @trumporg.com)</li> <li>d. Jared Kushner (@ijkfamily.com, @kushner.com, @kushnercompanies.com, jck@who.eop.gov, @trumporg.com)</li> <li>e. Donald J. Trump for President (@donaldtrump.com, @victory.donaldtrump.com, @trump.com, @donaldjtrump.com)</li> <li>f. Trump Make America Great Again Committee</li> </ul>



<ul style="list-style-type: none"> <li>l. Director of Federal Relations Katherine Anne Russo</li> <li>m. Director of External Affairs Mara Gambineri</li> <li>n. External Affairs Deputy Director Drew Meiner</li> </ul>	<ul style="list-style-type: none"> <li>g. Trump Victory</li> <li>h. America First Action (@a1apac.org, @prochcpas.com, @redprintstrategy.com)</li> <li>i. America First Policies (@americafirstpolicies.org)</li> <li>j. Republican National Committee (@gop.com, @rnchq.com)</li> <li>k. Great America Committee (@greatamericacommittee.com)</li> <li>l. Great America PAC (@GreatAmericaPAC.com)</li> <li>m. Great America Alliance (@greatamericaalliance.com)</li> <li>n. 45 Committee (@45committee.com)</li> <li>o. Committee to Defend the President (@committeetodefendthepresident.com, dan@political.law, @dbcapitolstrategies.com)</li> <li>p. Brad Parscale</li> <li>q. Parscale Strategies (@parscaledigital.com, @gilesparscale.com, @parscale.com)</li> <li>r. Thomas (Tommy) Hicks</li> <li>s. William Stepien (wstepien@aol.com, wstepien1@aol.com)</li> <li>t. Linda McMahon (@wwe.com, @wwecorp.com, @mcmahonventures.com, @mcm06.com)</li> <li>u. Nick Ayers (jnayers@gmail.com, na@nickayers.com, nick@targetla.com)</li> <li>v. Rob Porter</li> <li>w. Stefan Passantino (spassantino@michaelbest.com, stefanpassantino@onebox.com)</li> <li>x. Hope Hicks</li> <li>y. Tim Murtaugh</li> <li>z. Kayleigh McEnany</li> <li>aa. Ronna McDaniel</li> <li>bb. Joe Gruters</li> </ul>
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In an effort to accommodate your office and reduce the number of responsive records to be processed and produced, American Oversight has limited its request to emails sent by listed custodians. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both the sent messages and the prior received messages in

each email chain. This means, for example, that both Governor DeSantis's response to an email from Donald Trump Jr. and the initial received message are responsive to this request and should be produced.

Please provide all responsive records from January 1, 2019, to the date the search is conducted.

Please notify American Oversight of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fees.

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

In addition, American Oversight insists that Office of the Governor use the most up-to-date technologies to search for responsive information and take steps to ensure that the most complete repositories of information are searched. American Oversight is available to work with you to craft appropriate search terms. **However, custodian searches are still required; your office may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.**

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

Please take appropriate steps to ensure that records responsive to this request are not deleted by your office before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and the Office of the Governor can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or in PDF or TIF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

## Conclusion

American Oversight is a 501(c)(3) nonprofit with the mission to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.<sup>1</sup>

We share a common mission to promote transparency in government. American Oversight looks forward to working with the Office of the Governor on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully releasing the requested records, please contact Christine H. Monahan at [foia@americanoversight.org](mailto:foia@americanoversight.org) or (202) 869-5244.

Sincerely,



Austin R. Evers  
Executive Director  
American Oversight

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<sup>1</sup> American Oversight currently has approximately 14,800 page likes on Facebook and 87,000 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight/> (last visited Dec. 16, 2019); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited Dec. 16, 2019).