



November 19, 2020

VIA ELECTRONIC MAIL

Director, Office of Public Records
Florida Attorney General
107 West Gaines Street, Suite 228
Tallahassee, FL 32399-1050
PublicRecordsRequest@myfloridalegal.com

Re: Public Records Request

Dear Public Records Officer:

Pursuant to Article I, section 24(a), of the Florida Constitution, and 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 your office promptly produce the following:

- 1) All email communications (including emails, email attachments, calendar invitations, and attachments thereto) sent by (a) any of the officials in the Florida Office of the Attorney General listed in Column A, below, to (b) any of the external parties listed in Column B, below.
- 2) All email communications (including emails, email attachments, calendar invitations, and attachments thereto) sent by (a) any of the officials in the Florida Office of the Attorney General listed in Column A containing any of the following key terms:

Key Terms:

- i. Postmarked
- ii. Boockvar
- iii. Giuliani
- iv. Tabas
- v. "John Gore"
- vi. "Justin Clark"
- vii. "Nathan Groth"
- viii. Passantino
- ix. Papatov
- x. Langhofer
- xi. Basile
- xii. "Brett Johnson"
- xiii. "Eric Spencer"



- xiv. Landry
- xv. RAGA
- xvi. MAGA
- xvii. Trump
- xviii. POTUS
- xix. “election fraud”
- xx. “election integrity”

Column A: Florida Office of the Attorney General Officials	Column B: External Parties
<ul style="list-style-type: none"> a) Ashley Moody, Attorney General, or anyone communicating on her behalf (such as an assistant or scheduler) b) John Guard, Chief Deputy Attorney General c) Richard Martin, General Counsel d) Lauren Schenone, Director of Public Affairs 	<ul style="list-style-type: none"> a) Anyone communicating from an email address ending in @donaldtrump.com, @donaldjtrump.com, @trumpvictory.com, or @trumporg.com b) John Gore, Alex Popatov, or anyone communicating from an email address ending in @jonesday.com c) Justin Clark, Nathan Groth, Stefan Passantino, or anyone communicating from an email address ending in @michaelbest.com d) Kory Langhofer, Thomas Basile, or anyone communicating from an email address ending in @statecraftlaw.com e) Brett Johnson, Eric Spencer, or anyone communicating from an email address ending in @swlaw.com f) Anyone communicating from an email address ending in @gop.com, @rnchq.com, @wisgop.org, or @wisgop.info g) Jason Stuckey (including, but not limited to, at jstuckey@bricker.com) h) Jason Torchinsky (including, but not limited to, at jtorchinsky@hvjt.law) i) Jay Sekulow or anyone communicating from an email address ending in @aclj.org

	<ul style="list-style-type: none"> j) Matt Schlapp or anyone communicating from an email address ending in @conservative.org k) Rudolph Giuliani, or anyone communicating on his behalf (such as Jo Ann Zafonte, Christianne Allen, Beau Wagner, or anyone communicating from an email address ending in @giulianisecurity.com, giulianipartners.com, gdcillc.com) l) Anyone communicating from an email address ending in mail.house.gov or senate.gov m) Lawrence Tabas, Bernadette Comfort, or anyone communicating from an email address ending in @pagop.org n) Jeff Landry, or anyone communicating from an email address ending in @republicanags.com or ag.state.la.us o) Joseph diGenova, Victoria Toensing, or anyone communicating from an email address ending in @digenovatoensing.com p) Sidney Powell, or anyone communicating from an email address ending in @federalappeals.com q) Jenna Ellis, or anyone communicating from an email address ending in @falkirkcenter.com or @thomasmore.org.
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In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited its request to emails sent by the named officials. To be clear, however, American Oversight still requests that complete email chains be produced,

displaying both sent and received messages. This means that both a custodian's response to an email and the initial received message are responsive to this request and should be produced.

Please provide all responsive records from October 27, 2020, through 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 insists that your agency 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 your agency 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.¹

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency 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 Khahilia Shaw at records@americanoversight.org or (202) 539-6507.

Sincerely,



Austin R. Evers
Executive Director
American Oversight

¹ American Oversight currently has approximately 16,360 followers on Facebook and 106,100 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Nov. 10, 2020); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Nov. 10, 2020).