



January 22, 2021

**VIA EMAIL**

Doug Simon  
Director, House Business Office  
Michigan House of Representatives  
Anderson House Office Building  
124 North Capitol Avenue  
Lansing, MI 48909-7514  
[dsimon@house.mi.gov](mailto:dsimon@house.mi.gov)  
[businessoffice@house.mi.gov](mailto:businessoffice@house.mi.gov)

**Re: Financial Records Request**

Dear Director Simon:

Pursuant to House Standing Rule 72, American Oversight makes the following request for financial records.

On January 6, 2020, rioters stormed the U.S. Capitol, inciting violence that resulted in five deaths.<sup>1</sup> According to a video from the Ride Side Broadcasting Network, Michigan State Representative Matt Maddock and his wife Meshawn Maddock addressed a crowd outside of the Capitol on January 6.<sup>2</sup>

**Requested Records**

American Oversight requests that your office respond to this request for the following records within five business days:

Records reflecting any and all expenditures made and/or reimbursed by the legislature or any other state government entity in connection with Representative Matt Maddock's trip on or about January 6, 2021, to Washington, D.C., including, but not limited to, records of any reimbursements submitted by or on behalf of Representative Maddock.

Responsive records would include, but are not limited to, hotel or other lodging invoices or receipts; legislature-issued charge card or travel card reports; receipts from airlines, rental car, charter buses, or other transportation companies;

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<sup>1</sup> Eric Levenson, et al., *What We Know About the 5 Deaths in the Pro-Trump Mob that Stormed the Capitol*, CNN (Jan. 8, 2021, 5:29 PM), <https://www.cnn.com/2021/01/07/us/capitol-mob-deaths/index.html>.

<sup>2</sup> Soo Kim, *Every Republican Legislator Spotted at Rally Before Capitol Riot*, Newsweek (Jan. 8, 2021, 10:27 AM), <https://www.newsweek.com/every-republican-state-legislator-rally-capitol-riot-1560007>.



records reflecting the cost of government transportation; receipts or other records reflecting the cost of meals or refreshments; or records reflecting per diem payments.

Please provide all responsive records from January 1, 2021, to January 13, 2021.

### **Guidance Regarding the Search & Processing of Requested Records**

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics.
- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please use all tools available to conduct a complete and efficient search for potentially responsive records. Please search all relevant records or systems containing financial records. Do not exclude financial records contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages.
- 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 a request is denied in whole, please state specifically why 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 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.

### **Conclusion**

If you have any questions regarding how to construe this request for financial records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF 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.

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, please contact me at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 869-5244.

Sincerely,

/s/Christine H. Monahan  
Christine H. Monahan  
on behalf of  
American Oversight