



June 11, 2021

**VIA EMAIL**

Director, Office of Public Records  
107 W. Gaines Street, Suite 228  
Tallahassee, FL 32399  
[PublicRecordsRequest@myfloridalegal.com](mailto:PublicRecordsRequest@myfloridalegal.com)

**Re: Public Records Request**

Dear Director:

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 the Office of the Attorney General promptly produce the following:

1. All records reflecting the full content of any post published to Briefing Room<sup>1</sup> by Attorney General Ashley Moody or former Attorney General Pam Bondi (including the original post and the complete comment thread).
2. All records reflecting the full content of any Briefing Room posts (including the original post and the complete comment thread) on which Attorney General Moody or former Attorney General Pam Bondi commented.
3. All records reflecting the full content of any Briefing Room posts or comments (including the original post and the complete comment thread) mentioning or tagging Attorney General Moody or former Attorney General Pam Bondi by name, username, or email address.
4. All files uploaded to Briefing Room by Attorney General Moody or former Attorney General Pam Bondi.

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<sup>1</sup> Briefing Room is a file-sharing network and online bulletin room hosted by the Rule of Law Defense Fund, the non-profit policy arm of the Republican Attorneys General Association. See Andrew Perez & Lee Fang, *GOP Law Enforcement Chiefs Invited Donors to Help Set Policy Via Secret Bulletin Board*, Intercept (Feb. 12, 2018, 8:01 AM), <https://theintercept.com/2018/02/12/gop-law-enforcement-chiefs-invited-donors-to-help-set-policy-via-secret-bulletin-board/>.



5. All files downloaded from Briefing Room by Attorney General Moody or former Attorney General Pam Bondi, whether to a government or personal device.
6. All records reflecting the full content of any written exchanges, including chats, concerning legislation or policy issues on Briefing Room in which Attorney General Moody or former Attorney General Pam Bondi participated. Please note that American Oversight does not seek, and that this request specifically excludes, chats with Republican Attorneys General Association or Rule of Law Defense Fund support staff concerning information technology troubleshooting or related issues.
7. All records reflecting the content of Attorney General Moody or former Attorney General Pam Bondi's Briefing Room member profile page.

Please provide all responsive records from January 1, 2018, through the date a search is conducted.

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

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 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.<sup>2</sup>

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 Mehreen Rasheed at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 848-1320.

Sincerely,

/s/ Mehreen Rasheed  
Mehreen Rasheed  
on behalf of  
American Oversight

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<sup>2</sup> American Oversight currently has approximately 15,700 page likes on Facebook and 106,100 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited June 3, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited June 3, 2021).