



June 2, 2021

VIA EMAIL

Public Records Coordinator
Florida Senate
404 South Monroe Street
Tallahassee, FL 32399
publicrecordsrequests@flsenate.gov

Senator Wilton Simpson
409 The Capitol
404 South Monroe Street
Tallahassee, FL 32399
simpson.wilton@flsenate.gov

Re: Public Records Request

Dear Senator and Public Records Coordinator:

Pursuant to Article I, section 24(a), of the Florida Constitution, and Florida Senate Rule 1.48, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office promptly produce the following:

All electronic communications (including emails, email attachments, calendar invitations, calendar invitation attachments, text messages, messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp), and voice memos) between (a) Senator Simpson, the Senator's chief of staff, and anyone communicating on behalf of the Senator (such as a scheduler or assistant), and (b) the external parties listed below.

- i. Miriam Adelson, Robert Goldstein, Patrick Dumont, Randy Hyzak, Lawrence "Lon" Jacobs, Robert Hayden, Betty Yurcich, Andy Abboud, and anyone communicating from an email address ending in @sands.com, @lasvegassands.com, @marinabaysands.com, or @venetian.com
- ii. Eric Trump, Donald Trump Jr., Allen Weisselberg, Alan Garten, Lawrence Glick, Ron Lieberman, or anyone communicating on behalf of the Trump Organization, including but not limited to anyone communicating from an email address ending in @trumporg.com, @trump.com, @trumphotels.com, or @maralagoclub.com
- iii. Former President Donald Trump, Ivanka Trump, Dan Scavino, or any person communicating on behalf of former President Trump, including but not limited to anyone communicating from an email address ending



- in @donaldtrump.com, @donaldjtrump.com, @trumpvictory.com, @45office.com, or @trumporg.com
- iv. Any employees or representatives of Ballard Partners, including Brian Ballard, Pam Bondi, and anyone communicating from an email address ending in ballardfl.com
 - v. Tom Brady (including but not limited to emails ending in @buccaneers.com and @nfl.com)
 - vi. Any employees or representatives of the Big Easy Casino, Fontainebleau Miami Beach, Turnberry Associates, or Corcoran Partners, including Jeffrey Soffer, Jackie Soffer, Don Soffer, Michael Corcoran, and anyone communicating from an email address ending in @thebig easycasino.com, @fontainebleau.com, @turnberry.com, or @corcoranpartners.com

Please provide all responsive records from January 1, 2021, through the date of the search.

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

American Oversight insists that your office 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 office 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 Christine H. Monahan at records@americanoversight.org or (202) 869-5244

Sincerely,

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

¹ 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 1, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited June 1, 2021).