



December 1, 2021

VIA EMAIL

Senator Theresa Manzella
640 Gold Creek Loop
Hamilton, MT 59840
theresa.manzella@mtleg.gov

Re: Public Records Act Request

Dear Public Records Officer:

Pursuant to Art. II, Section 9, of the Montana Constitution, and the Montana Public Records Act, Mont. Code Ann. §§ 2-6-1001 *et seq.*, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office produce the following records in a timely manner:

All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) and text messages or messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, Twitter direct messages, Facebook messages, WhatsApp, Signal, Telegram, or Parler) between Sen. Theresa Manzella and the external individuals listed below (including, but not limited to, communications from the email addresses or domains specified below).

Please provide all responsive records from June 1, 2020, through the date the search is conducted.

Specified Parties:

1. Mike Lindell
2. Former Wisconsin Supreme Court justice Michael Gableman (mgableman@yahoo.com or wispecialcounsel@gmail.com)
3. Sidney Powell, and/or anyone communicating on behalf of Sidney Powell, P.C. (@federalappeals.com)
4. Former National Security Advisor Mike Flynn (@generalflynn.com), Joseph Flynn, or anyone communicating on behalf of America's Future
5. Rudolph Giuliani, and/or anyone communicating on his behalf (such as Jo Ann Zafonte, Christianne Allen, Beau Wagner (@giulianisecurity.com, @giulianipartners.com, or @gdcillc.com))
6. Cleta Mitchell (cleta@cletamitchell.com, cmitchell@foley.com, or @bradleyfdn.org)



7. Thomas Datwyler (tcdatwyler@gmail.com), or anyone communicating on behalf of the American Voting Rights Foundation
8. Phill Kline (phillklineva@gmail.com), Jacqueline Timmer, or anyone communicating on behalf of the American Voter's Alliance (@got-freedom.org)
9. Jenna Ellis, and/or anyone communicating on behalf of Liberty University's Falkirk Center (@falkirkcenter.com) or the Thomas More Society (@thomasmoresociety.org) or the American Greatness Fund (@americangreatnessfund.com)
10. Corey Lewandowski
11. Earl Eugene Kern, and/or anyone communicating on behalf of Wake Technology Services, Inc. (@waketsi.com)
12. Ben Cotton, and/or anyone communicating on behalf of CyFir (@cyfir.com)
13. Heather Honey, and/or anyone communicating on behalf of Haystack Investigations (@haystackinvestigations.com)
14. Doug Logan, and/or anyone communicating on behalf of Cyber Ninjas (@cyberninjas.com)
15. Colonel Phil Waldron (phil@onewarrior.com, JWRLLC@gmail.com, or p@bonfiresearch.org), Russell Ramsland (ryuks9sq@alliedspecialops.us), James Keet Lewis III (keet@jkeetlewis.com) and/or anyone communicating on behalf of Allied Security Operations Group (@alliedspecialops.us)
16. Jovan Hutton Pulitzer (jovanhuttonpulitzer@gmail.com)
17. Patrick Byrne or anyone communicating on behalf of the America Project (@americaproject.com)
18. Matthew DePerno or anyone communicating on behalf of the DePerno Law Office (@deper nolaw.com)
19. Catherine Engelbrecht or anyone communicating on behalf of True the Vote (@truethevote.org)
20. John Eastman (jeastman@claremont.org or @attorneyeastman.com)
21. Lin Wood, including (lwood@fightback.law)
22. Shiva Ayyadurai (vashiva@vashiva.com)
23. Hogan Gidley, Ken Blackwell (kennethblackwell693@gmail.com) or anyone communicating on behalf of the America First Policy Institute (@americafirstpolicy.com)
24. Barry Farah (barry@barryfarah.com)
25. Douglas Frank (drdouglasfrank@protonmail.com)
26. Ron Watkins

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

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 search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business 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 by the agency 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.

If you have any questions regarding how to construe this request for 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. 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 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.

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, please contact Taylor Stoneman at records@americanoversight.org or (202) 848-1319.

Sincerely,

/s/ Taylor Stoneman
Taylor Stoneman
on behalf of
American Oversight

¹ American Oversight currently has approximately 15,600 page likes on Facebook and 109,100 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Nov. 17, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Nov. 17, 2021).