



December 2, 2021

**VIA EMAIL**

South Carolina Attorney General's Office  
FOIA Office  
PO Box 11549  
Columbia, SC 29211  
[FOIA@scag.gov](mailto:FOIA@scag.gov)

**Re: Freedom of Information Act Request**

Dear Freedom of Information Officer:

Pursuant to the South Carolina Freedom of Information Act, S.C. Code Ann. §§ 30-4-10 et seq., American Oversight makes the following request for records.

**Requested Records**

American Oversight requests that the South Carolina Attorney General's Office promptly produce the following records:<sup>1</sup>

1. All email communications (including emails, email attachments, calendar invitations, and attachments thereto) between (a) Attorney General Alan Wilson, Chief Deputy Attorney General William Jeffrey "Jeff" Young, or anyone communicating on their behalf (such as an assistant or scheduler), and (b) any individuals or representatives of the external entities listed below (including, but not limited to, anyone communicating from an email address ending with the listed domains):

**Individuals and External Entities:**

- i. The Concord Fund
- ii. CRC Advisors (@crcadvisors.com), CRC Strategies (@crcpublicrelations.com), Leonard Leo, Jonathan Bunch, and Greg Mueller
- iii. Judicial Crisis Network (@judicialnetwork.com), Daniel Casey, Gary Marx, and Carrie Severino
- iv. Honest Elections Project (@honestelections.org) and Jason Snead
- v. U.S. Chamber of Commerce and US. Chamber Institute for Legal Reform (@uschamber.com)

---

<sup>1</sup> Pursuant to S.C. Code Ann. § 30-4-30(C), please notify American Oversight of your final determination as to the public availability of the requested records within ten business days and produce the records within thirty calendar days after issuing your final determination.



- vi. Koch Industries (@kochind.com) and Koch Companies Public Sector (@kochps.com), David Dunlap, Mike Morgan, Mark Nichols, Paul Brown, Philip Ellender, Steve Lombardo, Dale Gibbens, and William C. Kinney
  - vii. Americans for Prosperity (@afphq.org and @americansforprosperity.org), Tim Phillips, and Emily Seidel
  - viii. Melaleuca (@melaleuca.com) and Frank VanderSloot
  - ix. Altria Group (@altria.com), and Phillip Morris (@pmi.com)
  - x. Mallinckrodt Pharmaceuticals (@mallinckrodt.com)
  - xi. Juul Labs (@juul.com and @juullabs.com)
  - xii. Ariel Corporation (@arielcorp.com), Thomas Rastin, and Karen Wright
  - xiii. Las Vegas Sands (@sands.com and @lasvegassands.com), Marina Bay Sands (@marinabaysands.com), The Venetian Resort (@venetian.com), Miriam Adelson, Robert Goldstein, Patrick Dumont, Randy Hyzak, Lawrence “Lon” Jacobs, Robert Hayden, Betty Yurcich, and Andy Abboud
  - xiv. Mountaire Farms (@mountaire.com), Ronald Cameron, and Kevin Garland
  - xv. Ace Cash Express (@acecashexpress.com), Jay Shipowitz, and Eric Norrington
  - xvi. Peter Thiel
  - xvii. C. Boyden Gray
  - xviii. Rex Sinquefeld
  - xix. Smart Media Group (@smartmediagrp.com or @smartmediagroup.com)
  - xx. AT&T (@att.com)
  - xxi. The Anschutz Corporation (@anschuetz-sport.com or @anschutznorthamerica.com)
  - xxii. Daniel Defense (@danieldefense.com)
  - xxiii. Anheuser-Busch (@anheuser-busch.com), Foster Routh III, Jeffrey Thordahl, and Kimberly Kent
  - xxiv. MBX Capital (@mbxcapital)
  - xxv. Blue Cross Blue Shield of South Carolina (@bcbssc.com), Baylen Moore, Greg Truesdal, Harry Cato, Mary Elizabeth Mullikin, Thomas Moore, and Tiffany Freeman
  - xxvi. Smith & Wesson (@smith-wesson.com)
  - xxvii. Pfizer (@pfizer.com), Darrell Campbell, and Melissa Bishop-Murphy
  - xxviii. Consovoy McCarthy (@consovoymccarthy.com)
  - xxix. American Petroleum Institute (@api.org) and Mark Harmon
  - xxx. Karen Iacovelli
  - xxxi. Foley and Lardner (@foley.com)
  - xxxii. GEO Group (@geogroup.com), Robert Adams, and William Boan
2. All email communications (including emails, email attachments, calendar invitations, and attachments thereto) sent or received by Attorney General

Alan Wilson, or anyone communicating on his behalf (such as an assistant or scheduler), containing any of the following search terms:

**Search Terms:**

- |                                 |                           |
|---------------------------------|---------------------------|
| 1. "Concord Fund"               | 26. Melaleuca             |
| 2. "Institute for Legal Reform" | 27. Mountaire             |
| 3. ILR                          | 28. "Ronald Cameron"      |
| 4. "Koch Industries"            | 29. "Ronnie Cameron"      |
| 5. "Koch Companies"             | 30. "Ron Cameron"         |
| 6. "Americans for Prosperity"   | 31. "Ace Cash"            |
| 7. AFP                          | 32. Sinquefield           |
| 8. Mallinckrodt                 | 33. "Smart Media"         |
| 9. Juul                         | 34. AT&T                  |
| 10. Altria                      | 35. Anschutz              |
| 11. Adelson                     | 36. Anschuetz             |
| 12. Thiel                       | 37. "Daniel Defense"      |
| 13. "Boyden Gray"               | 38. Anheuser              |
| 14. "Leonard Leo"               | 39. MBX                   |
| 15. "Jonathan Bunch"            | 40. "Blue Cross"          |
| 16. "Greg Mueller"              | 41. BCBS                  |
| 17. JCN                         | 42. Wesson                |
| 18. "Judicial Crisis"           | 43. Pfizer                |
| 19. "Gary Marx"                 | 44. Consovoy              |
| 20. "Daniel Casey"              | 45. "Petroleum Institute" |
| 21. "Carrie Severino"           | 46. API                   |
| 22. "Honest Elections Project"  | 47. Iacovelli             |
| 23. Snead                       | 48. Foley                 |
| 24. "Ariel Corp"                | 49. "GEO Group"           |
| 25. VanderSloot                 |                           |

For request item 2, please note that American Oversight does not seek, and that this request specifically excludes, the initial mailing of news clips or other mass-distribution emails. However, subsequent communications forwarding such emails are responsive to this request. In other words, for example, if Attorney General Wilson received a mass-distribution news clip email referencing Pfizer, that initial email would not be responsive to this request. However, if Attorney General Wilson forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

For both items of this request, please provide all responsive records from June 22, 2021, to the date the request is received by your office.

**Fee Waiver Request**

In accordance with S.C. Code Ann. § 30-4-30(B), American Oversight requests a waiver of fees associated with processing this request for records. Disclosure of the

requested records is in the public interest because it will likely contribute to a better understanding of relevant government procedures by the general public in a significant way. In addition, this request is primarily and fundamentally for non-commercial purposes.

A waiver of fees is “in the public interest because furnishing the information can be considered as primarily benefiting the general public.”<sup>2</sup> The general public has a significant interest in understanding Attorney General Wilson’s association with funders of the Republican Attorneys General Association (RAGA).<sup>3</sup> Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the government, including whether and to what extent prominent RAGA donors sought to influence Attorney General Wilson. American Oversight is committed to transparency and makes the responses agencies provide to public records requests publicly available, and the public’s understanding of the government’s activities would be enhanced through American Oversight’s analysis and publication of these records.

Furthermore, American Oversight’s work is aimed solely at serving the public interest. As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight’s financial interest. American Oversight’s mission is 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>4</sup>

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.<sup>5</sup> Examples reflecting this commitment to the public disclosure of documents and the creation of editorial content include the posting of records and analysis related to the organization’s investigations into misconduct and corruption in

---

<sup>2</sup> S.C. Code Ann. § 30-4-30(B).

<sup>3</sup> Avery G. Wilks, *Attorney General Wilson Disavows Robocall that Invited ‘Patriots’ to DC Rally-Turned-Riot*, Post & Courier, Jan. 11, 2021, [https://www.postandcourier.com/politics/sc-attorney-general-wilson-disavows-robocall-that-invited-patriots-to-dc-rally-turned-riot/article\\_df16fdd0-542c-11eb-ae88-ff7553b33b9f.html](https://www.postandcourier.com/politics/sc-attorney-general-wilson-disavows-robocall-that-invited-patriots-to-dc-rally-turned-riot/article_df16fdd0-542c-11eb-ae88-ff7553b33b9f.html).

<sup>4</sup> American Oversight currently has approximately 15,600 page followers on Facebook and 109,200 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Dec. 1, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Dec. 1, 2021).

<sup>5</sup> See generally *News*, American Oversight, <https://www.americanoversight.org/blog>.

state governments;<sup>6</sup> posting records and analysis of federal and state governments' responses to the Coronavirus pandemic;<sup>7</sup> posting records received as part of American Oversight's "Audit the Wall" project to gather and analyze information related to the Trump administration's proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;<sup>8</sup> and the posting of records related to an ethics waiver received by a senior Department of Justice attorney and an analysis of what those records demonstrated regarding the Department's process for issuing such waivers.<sup>9</sup>

Accordingly, American Oversight qualifies for a fee waiver.

### **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:

---

<sup>6</sup> See generally *State Investigations*, American Oversight, <https://www.americanoversight.org/states>; see, e.g., *State Government Contacts with Voting-Restriction Activists*, American Oversight, <https://www.americanoversight.org/investigation/state-government-contacts-with-voting-restriction-activists>; *Georgia's Voting Machines and Election Security*, American Oversight, <https://www.americanoversight.org/investigation/georgias-voting-machines-and-election-security>.

<sup>7</sup> See, e.g., *The Trump Administration's Response to Coronavirus*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus>; *Tulsa Health Officials Initially Estimated Trump Rally Would Directly Lead to 2 to 9 Deaths*, American Oversight, <https://www.americanoversight.org/tulsa-health-officials-initially-estimated-trump-rally-would-directly-lead-to-2-to-9-deaths>; *Wisconsin Documents Offer Window into Early Uncertainty over COVID-19*, American Oversight, <https://www.americanoversight.org/wisconsin-documents-offer-window-into-early-uncertainty-over-covid-19>; *In the Documents: Florida Health Department Efforts to Suppress Release of Coronavirus Records*, American Oversight, <https://www.americanoversight.org/in-the-documents-florida-health-department-efforts-to-suppress-release-of-coronavirus-records>.

<sup>8</sup> See generally *Audit the Wall*, American Oversight, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Border Wall Investigation Report: No Plans, No Funding, No Timeline, No Wall*, American Oversight, <https://www.americanoversight.org/border-wall-investigation-report-no-plans-no-funding-no-timeline-no-wall>.

<sup>9</sup> *DOJ Records Relating to Solicitor General Noel Francisco's Recusal*, American Oversight, <https://www.americanoversight.org/document/doj-civil-division-response-noel-francisco-compliance>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- 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.<sup>10</sup> 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.

## **Conclusion**

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

---

<sup>10</sup> S.C. Code Ann. § 30-4-40(b).

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, have any questions, or foresee any problems in fully releasing the requested records, please contact Khahilia Shaw at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 539-6507.

Sincerely,

/s/ Khahilia Shaw  
Khahilia Shaw  
on behalf of  
American Oversight