



February 03, 2022

VIA EMAIL

Constance Halonen-Wilson
Public Information Officer
Town of Queen Creek, Arizona
22358 S. Ellsworth Road
Queen Creek, AZ 85142
Constance.Wilson@QueenCreekAZ.gov

Re: Public Records Request

Dear Public Records Officer:

Pursuant to the Arizona Public Records Law, A.R.S. §§ 39-121 et seq., American Oversight makes the following request for records.

In December 2020, groups reportedly met in Arizona, Georgia, Michigan, New Mexico, Nevada, Pennsylvania, and Wisconsin to create and submit illegitimate electoral certificates declaring the victory of former President Donald Trump in states officially won by President Joe Biden in the November 2020 presidential election.¹

American Oversight seeks records with the potential to shed light on the role of public officials in the creation of these electoral certificates, including whether and to what extent the Trump campaign and its allies coordinated with state officials on such efforts.

Requested Records

American Oversight requests that the Queen Creek, Arizona Town Council promptly produce the following records:

All email communications (including emails, email attachments, complete email chains, and calendar invitations) 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, The Buzz, or Parler) between (a) former Queen Creek Town Council member Jake Hoffman and (b) any entity or individual listed below including, but not limited to, any communication with any listed email address or domain.

¹ Luke Broadwater and Alan Feuer, *Jan. 6 Committee Subpoenas Fake Trump Electors*, N.Y. Times, Jan. 28, 2022, <https://www.nytimes.com/2022/01/28/us/politics/jan-6-committee-trump-electors.html>.



- i. Rudolph Giuliani, or anyone communicating on his behalf (such as Jo Ann Zafonte, Christianne Allen, Beau Wagner, or anyone communicating from an email address ending in @giulianisecurity.com, giulianipartners.com, or gdcillc.com)
- ii. Jenna Ellis (jennaellis.esq@gmail.com), or anyone communicating on behalf of Liberty University's Falkirk Center (including anyone communicating from an email address ending in @falkirkcenter.com), the Thomas More Society (including anyone communicating from @thomasmoresociety.org), or the American Greatness Fund (@americangreatnessfund.com)
- iii. Anyone communicating from an email address ending in @donaldtrump.com, @donaldjtrump.com, @trumpvictory.com, @45office.com, or @trumporg.com
- iv. Mark Meadows, or anyone serving in the White House (including anyone communicating from an email address ending in @who.eop.gov)
- v. John Eastman (including, but not limited to, anyone communicating from the email address jeastman@claremont.org or jeastman@chapman.edu, or anyone communicating from an email address ending in @ccg1776.com)
- vi. Stephen Miller (including, but not limited to, anyone communicating from the email address Stephen.miller@who.eop.gov or s.miller@who.eop.gov)
- vii. Ian Northon
- viii. Marc Short
- ix. Greg Jacobs
- x. Christina Bobb, Charles Herring, Robert Herring, Chanel Rion, Natalie Harp, Stephanie Myers, Patrick Hussion, Stephanie Hammill, or anyone communicating on behalf of the One America News (including, but not limited to, anyone communicating from an email address ending in @oann.com)
- xi. Boris Epshteyn (bepshteyn@protonmail.com)
- xii. Nancy Cottle
- xiii. Loraine B. Pellegrino
- xiv. Tyler Bowyer
- xv. Former Representative Anthony Kern
- xvi. James Lamon
- xvii. Robert Montgomery (including, but not limited to, anyone communicating from the email address robmont59@msn.com)
- xviii. Samuel I. Moorhead
- xix. Greg Safsten
- xx. Dr. Kelli Ward (including, but not limited to, anyone communicating from the email address kelli.ward@azgop.org)
- xxi. Dr. Michael Ward
- xxii. Phill Kline (phillklineva@gmail.com), Luis Cornelio (lcornel001@citymail.cuny.edu) and/or anyone communicating on behalf of the Thomas More Society (@thomasmoresociety.org) or The Amistad Project

- xxiii. Jacqueline Timmer, Mary Coran, and/or anyone communicating on behalf of the American Voter's Alliance (@got-freedom.org)
 - xxiv. Colonel Phil Waldron (including, but not limited to, phil@onewarrior.com or anyone communicating from an email address ending in @bonfiresearch.org)
 - xxv. Russell Ramsland (including, but not limited to yrku9sqs@protonmail.com)
 - xxvi. J. Keet Lewis (keet@jkeetlewis.com), and/or anyone communicating on behalf of Allied Security Operations Group (including anyone communicating from an email address ending in @alliedspecialops.us)
 - xxvii. Charles Bundren III (charles@bundrenlaw.net)
 - xxviii. Jovan Hutton Pulitzer (jovanhuttonpulitzer@gmail.com)
 - xxix. Doug Frank (drdouglassgfrank@protonmail.com)
 - xxx. Ivan Raiklin (ivan.raiklin@gmail.com, socialmediaraiklin@gmail.com)
 - xxxi. Former National Security Advisor Mike Flynn (including, but not limited to, an address ending in @generalflynn.com) and/or anyone communicating on behalf of America's Future (including, but not limited to, anyone communicating from an address ending in @americasfuture.net)
 - xxxii. Katherine Friess (kfriess@protonmail.com)
 - xxxiii. Bernard Kerik (bernardkerik@protonmail.com)
 - xxxiv. Emily Newman (enewman@protonmail.com)
2. All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) 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, The Buzz, or Parler) sent or received by Former Town Council Member Jake Hoffman related to the issue of electoral certificates or "alternate electors."²

For both parts of this request, please provide all responsive records from October 1, 2020, to January 10, 2021.

Statement of Noncommercial Purpose

This request is made for noncommercial purposes. American Oversight seeks records regarding potential communications of public officials with Donald Trump's presidential campaign and associates concerning the compiling of "alternate" slates of electors to sign illegitimate Electoral College certificates.³ Records with the potential to

² If further identifying information is needed, please see Broadwater & Feuer, *supra* note 1.

³ Zachary Cohen & Marshall Cohen, *Trump Allies' Fake Electoral Certificates Offer Fresh Insights About Plot to Overturn Biden's Victory*, CNN, (Updated January 12, 2022, 9:12

shed light on this matter would contribute significantly to public understanding of operations of the government, including whether and to what extent public officials coordinated with allies or members of Trump’s campaign to develop the certificates.

Because American Oversight is a 501(c)(3) nonprofit, this request is not in American Oversight’s financial interest and is not made for a commercial purpose. 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.⁴

Because this request is made for noncommercial purposes, American Oversight requests that any fees charged in connection with processing this request be limited to copying and postage charges, if applicable.⁵ Please notify American Oversight of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fees.

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. 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.
- In conducting your search, please understand the terms “record,” “document,” and “information” in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of

PM), <https://www.cnn.com/2022/01/12/politics/trump-overturn-2020-election-fake-electoral-college/index.html>.

⁴ American Oversight currently has approximately 15,700 page likes on Facebook and 114,500 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Feb. 2, 2022); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Feb. 2, 2022).

⁵ A.R.S. § 39-121.01(D)(1); *see also Hanania v. City of Tucson*, 128 Ariz. 135, 624 P.2d 332 (Ct. App. 1980). Furthermore, because this request is for noncommercial purposes, additional fees provided for under A.R.S. § 39-121.03(A) are not applicable and should not be assessed.

any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions.

- 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.
- If any records are withheld in full or in part, pursuant to A.R.S. § 39-121.01(D)(2), please provide an index of records or categories of records that have been withheld and the reasons the records or categories of records have been withheld.
- 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.

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 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 Khahilia Shaw at records@americanoversight.org or (202) 539-6507.

Sincerely,

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