



March 7, 2022

VIA EMAIL

Florida Department of State
Office of the General Counsel
500 S. Bronough Street
Tallahassee, FL 32399
DOS.GeneralCounsel@DOS.MyFlorida.com

Re: Public Records Request

Dear Public Records Officer:

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 your office promptly produce the following:

All electronic communications (including emails, email attachments, text messages, or messages on messaging platforms, such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp) between (A) the listed officials in the Office of the Secretary of State of Florida and (B) any of the external individuals or entities listed below, including, but not limited to at the suggested email addresses or domains.

In the case of emails and texts, the search should include those sent or received from the specified officials' personal accounts and/or devices if they were used to conduct official business, as well those sent from their official email addresses or government-issued devices.

Please provide all responsive records from November 3, 2020, through the date the search is conducted.

A. Secretary of State Officials:

1. Secretary of State, Laurel Lee
2. Division of Elections Director, Maria Matthews
3. General Counsel, Brad McVay
4. Deputy General Counsel, Ashley Davis

B. External Entities:

1. Al Hartman, Jenny Limcher, and/or anyone communicating on behalf of Hartman REIT (@hi-reit.com)



2. Anyone communicating from the email addresses arizonaaudit@gmail.com, arizonaaudit@protonmail.com, azaudit@gmail.com, azauditmedia@gmail.com, azauditpress@gmail.com, and/or info@arizonaaudit.com
3. Boris Epshteyn (bepshteyn@gmail.com)
4. Charles Bundren III (charles@bundrenlaw.net)
5. Chris Witt, Earl Eugene Kern, and/or anyone communicating on behalf of Wake Technology Services, Inc. (@waketsi.com)
6. Christina Bobb, Chanel Rion, Graham Ledger (grahamledger@yahoo.com), and/or anyone communicating on behalf of One America News Network, including anyone communicating from an email address ending in @oann.com
7. Cleta Mitchell (including, but not limited to, cleta@cletamitchell.com, cmitchell@foley.com, or email addresses ending in @bradleyfdn.org)
8. Colonel Phil Waldron (phil@onewarrior.com or anyone communicating from an email address ending in @bonfiresearch.org)
9. Doug Logan, and/or anyone communicating on behalf of Cyber Ninjas (@cyberninjas.com)
10. Emily Newman (enewman@protonmail.com), Todd Sanders (todd@krknsys.com), and/or anyone communicating from an email address ending in @americaproject.com
11. Former National Security Advisor Michael Flynn (@generalflynn.com), Joseph Flynn, Charles Flynn, Michael Flynn Jr., and/or anyone communicating on behalf of America's Future (@americasfuture.net)
12. Ivan Raiklin (ivan.raiklin@gmail.com, socialmediaraiklin@gmail.com)
13. Jacqueline Timmer, Mary Coran, and/or anyone communicating on behalf of the American Voter's Alliance (@got-freedom.org)
14. Jenna Ellis (jenna.ellis.esq@gmail.com), and/or anyone communicating on behalf of Liberty University's Falkirk Center (falkirkcenter.com) or the American Greatness Fund (@americangreatnessfund.com)
15. John Eastman (jeastman@claremont.org) and/or anyone communicating on behalf of Constitutional Counsel Group (@ccg1776.com)
16. Jovan Hutton Pulitzer (jovanhuttonpulitzer@gmail.com)
17. Julie Fisher (aztrumplican@gmail.com, azwinos@gmail.com, and/or julie.fisher@az51.org)
18. Katherine Ann Christy (katherine@florida-capital.com)
19. Katherine Friess (kfriess@protonmail.com)
20. Ken Bennett (kbennettaz7@gmail.com, kbazos@gmail.com, and/or kjbennettaz@gmail.com)
21. Kurt Olsen (kurtols@protonmail.com)
22. Matt Braynard, and/or anyone communicating on behalf of Look Ahead America (@lookaheadamerica.org)
23. Matthew DePerno (matthew@depernelaw.com)
24. Mike Lindell (mike@mypillow.com)
25. Mike Roman (mikeroman@protonmail.com)
26. 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

27. Raj Doraisamy, Caroline Wetherington, or anyone communicating on behalf of Defend Florida or Defend Our Union (@defendourunion.org)
28. Rob Natelson (rob.natelson1@gmail.com)
29. Russell Ramsland (yrku9sqs@protonmail.com), J. Keet Lewis (keet@jkeetlewis.com), and/or anyone communicating on behalf of Allied Security Operations Group (@alliedspecialops.us)
30. Shiva Ayyadurai (vashiva@vashiva.com), and/or anyone communicating from an email address ending in @echomail.com
31. Sidney Powell (sp@seeking-justice.org, sidney@federalappeals.com)
32. Steve Montenegro (stevemontenegro@gmail.com, stevemontenegro@protonmail.com, steve@coronamconsulting.com)
33. William Olson (williamolson@lawandfreedom.com, wjo@mindspring.com)

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 one of the listed officials received a mass-distribution news clip email from One America News Network, that initial email would not be responsive to this request. However, if they forwarded that email to another individual with their own commentary, that subsequent message would be responsive to this request and should be produced.

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.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 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 15,720 page likes on Facebook and 117,800 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Feb. 28, 2022); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Feb. 28, 2022).