

May 03, 2022

VIA EMAIL

Attorney General Treg R. Taylor 1031 West 4th Avenue, Suite 200 Anchorage, AK 99501 attorney.general@alaska.gov

Re: Public Records Act Request

Dear Records Custodian:

Pursuant to the Alaska Public Records Act, AS §§ 40.25.110 et seq., American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office produce the following records within five business days:

1. 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) Attorney General Treg Taylor, or anyone communicating on his behalf such as a Chief of Staff, scheduler, or assistant and (b) any of the outside entities listed below:

Outside Entities:

- a. Anyone communicating from America First Legal, including Stephen Miller, Ken Starr, Mark Meadows, Gene Hamilton, Jim DeMint, Matthew Whitaker, Russ Vought, Reed Rubenstein, or anyone communicating from an email address ending in @aflegal.org
- b. Anyone communicating from the Conservative Partnership Institute, including Ed Corrigan, Wesley Denton, or anyone communicating from an email address ending in @conservativepartnership.org or @cpi.org
- c. Anyone communicating on behalf of the Texas Attorney General's office, including anyone communicating from an email address ending in @texasattorneygeneral.gov or @oag.texas.gov
- d. Anyone communicating on behalf of the Arkansas Attorney General's office, including anyone communicating from an email address ending in @arkansasag.gov
- e. Anyone communicating on behalf of the Florida Attorney General's office, including anyone communicating from an email address ending in @myfloridalegal.com



- f. Anyone communicating on behalf of the Indiana Attorney General's office, including anyone communicating from an email address ending in @atg.in.gov
- g. Anyone communicating on behalf of the Missouri Attorney General's office, including anyone communicating from an email address ending in @ago.mo.gov
- h. Anyone communicating on behalf of the Montana Attorney General's office, including anyone communicating from an email address ending in @mt.gov
- i. Anyone communicating on behalf of the Oklahoma Attorney General's office, including anyone communicating from an email address ending in @oag.ok.gov
- j. Anyone communicating on behalf of the South Carolina Attorney General's office, including anyone communicating from an email address ending in @scag.gov
- k. Jonathan Bronitksy (jonathan@athospr.com)
- l. Alexei Woltornist (<u>alexei@athospr.com</u>)

Please note that American Oversight does not seek, and that this request specifically <u>excludes</u>, the <u>initial</u> mailing of news clips or other mass-distribution emails. However, subsequent communications forwarding such emails <u>are</u> responsive to this request. In other words, for example, if Attorney General Taylor received a mass-distribution news clip email from the Conservative Partnership Institute, that initial email would <u>not</u> be responsive to this request. However, if Taylor responded to that email with his own commentary, that subsequent message would be responsive to this request and should be produced.

- 2. All email communications (including emails, email attachments, complete email chains, and calendar invitations) <u>sent by</u> Attorney General Treg Taylor, or anyone communicating on his behalf such as a Chief of Staff, scheduler, or assistant, containing the key terms listed below:
 - a. AFL
 - b. "America First Legal"
 - c. "Stephen Miller"
 - d. Meadows
 - e. Whitaker
 - f. Vought
 - g. Hamilton
 - h. Corrigan
 - i. Denton
 - j. Athos

In an effort to accommodate the Office of the Attorney General and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited its request to emails <u>sent</u> by the specified custodians. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both sent and received messages.

This means, for example, that both Attorney General Taylor's response to an email from containing a key term and the initial received message are responsive to this request and should be produced.

For both parts of this request, please provide all responsive records from September 21, 2021, through January 27, 2022.

Fees Waiver Request

Pursuant to AS § 40.25.110(d) and your agency's fee waiver policy, American Oversight requests a waiver of fees associated with this request for records. 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 information gathered through research and public records requests, 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

American Oversight's request serves the public interest.² The public has a significant interest in communications Attorney General Taylor may be having with individuals from America First Legal. Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the Alaskan government, including whether and to what extent Attorney General Taylor is communicating with individuals from America First Legal.

Accordingly, American Oversight respectfully requests 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:

- 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

¹ American Oversight currently has approximately 15,725 page likes on Facebook and 117,200 followers on Twitter. American Oversight, Facebook, https://www.facebook.com/weareoversight/ (last visited Apr. 28, 2022); American Oversight (@weareoversight), Twitter, https://twitter.com/weareoversight (last visited Apr. 28, 2022).

² AS § 40.25.110(d).

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.

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 Hart Wood at records@americanoversight.org or (202) 873-1743.

Sincerely,

/s/ Hart Wood Hart Wood on behalf of American Oversight