



May 23, 2022

**VIA EMAIL**

Director of Open Government  
Florida House of Representatives  
402 South Monroe Street  
Tallahassee, FL 32399  
[opengovernment@myfloridahouse.gov](mailto:opengovernment@myfloridahouse.gov)

Speaker Chris Sprowls  
420 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Majority Leader Michael Grant  
322 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Speaker Pro Tempore Bryan Avila  
418 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Rep. Randy Fine  
222 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Rep. Chris Latvala  
418 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Rep. Joe Harding  
1101 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Rep. Erin Grall  
417 House Office Building  
402 South Monroe Street  
Tallahassee, FL 32399-1300



Rep. John Snyder  
1101 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Rep. Stan McClain  
308 House Office Building  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Rep. Spencer Roach  
308 House Office Building  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Rep. Scott Plakon  
222 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

**Re: Public Records Request**

Dear Public Records Officer:

Pursuant to Article I, section 24(a), of the Florida Constitution, and Florida House Rule 14, Part One, American Oversight makes the following request for records.

**Requested Records**

American Oversight requests that your office promptly produce the following:

All electronic communications (including email messages, complete email chains, calendar invitations, text messages, and any attachments) sent by (A) the Florida legislators and legislative aides listed in Column A, below, and (B) individuals communicating on behalf of the external organizations listed in Column B, below (including, but not limited to, anyone communicating from an email address ending in the listed domain(s)).

<b>Column A: Florida Legislators</b>	<b>Column B: External Organizations</b>
a) Speaker Chris Sprowls	i. Alliance Defending Freedom (adflegal.org)
b) Legislative Aide Kayla Wade	ii. America First Legal (aflegal.org)
c) Majority Leader Michael Grant	iii. American College of Pediatricians (acpeds.org)
d) Legislative Aide Jim Browne	iv. American Family Association (afa.net)
e) Speaker Pro Tempore Bryan Avila	

f) Legislative Aide Carolina Castillo	v. American Principles Project (americanprinciplesproject.org)
g) Rep. Randy Fine	vi. Child and Parental Rights Campaign (childparentrights.org)
h) Legislative Aide Anna Budko	vii. Concerned Women for America (concernedwomen.org or cwfa.org)
i) Rep. Chris Latvala	viii. Eagle Forum (@eagleforum.org)
j) Legislative Aide Amy Gregory	ix. Family Policy Alliance (familypolicyalliance.com)
k) Rep. Joe Harding	x. Family Research Council (frc.org)
l) District Aide Haylee Austin	xi. Family Research Council Action (fraction.org)
m) Rep. Erin Grall	xii. First Liberty Institute (firstliberty.org)
n) Rep. John Snyder	xiii. Florida Family Policy Council (flfamily.org)
o) Legislative Aide Sarah Craven	xiv. Liberty Counsel (lc.org, lcaction.org)
p) Rep. Stan McClain	xv. United In Purpose (unitedinpurpose.org)
q) Legislative Aide Ryan Thomas	xvi. Wallbuilders (wallbuilders.com)
r) Rep. Spencer Roach	xvii. Child and Parental Rights Campaign (childparentrights.org)
s) Rep. Scott Plakon	
t) Legislative Aide Nicolas Frevola	

Please provide all responsive records from January 11, 2022, to April 7, 2022.

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited its request to emails sent by the listed individuals. 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 a legislator's response to an email from the Child and Parental Rights Campaign (childparentrights.org) and the initial received message are responsive to this request and should be produced.

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

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of 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 includes any attachments to these

records. **No category of material should be omitted from search, collection, and production.**

In addition, American Oversight insists that your office 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 office 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.<sup>1</sup>

We share a common mission to promote transparency in government. American Oversight looks forward to working with your office 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](mailto:records@americanoversight.org) or (202) 848-1319.

Sincerely,

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

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<sup>1</sup> American Oversight currently has approximately 16,000 followers on Facebook and 117,300 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited May 20, 2022); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited May 20, 2022).