



February 27, 2023

VIA EMAIL:

Director of Open Government
Florida House of Representatives
402 South Monroe Street
Tallahassee, FL 32399
opengovernment@myfloridahouse.gov

Office of Speaker Paul Renner
420 The Capitol
402 South Monroe Street
Tallahassee, FL 32399-1300
Paul.Renner@myfloridahouse.gov

Office of Rep. Sam Garrison
222 The Capitol
402 South Monroe Street
Tallahassee, FL 32399-1300
Sam.Garrison@myfloridahouse.gov

Office of Rep. Thomas Leek
418 The Capitol
402 South Monroe Street
Tallahassee, FL 32399-1300
Tom.Leek@myfloridahouse.gov

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:

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



Column A: Representatives and Staff	Column B: External Organizations
<ul style="list-style-type: none"> a. House Speaker Paul Renner b. Chief of Staff Allison Carter c. District Aide Shannon Shephard d. Representative Sam Garrison e. Legislative Aide Ryan Kimmey f. Representative Thomas Leek g. Legislative Aide Stephanie Wohlford 	<ul style="list-style-type: none"> a. Alliance Defending Freedom (adflegal.org) b. Family Policy Alliance (familypolicyalliance.com) c. American College of Pediatricians (acpeds.org) d. Child and Parental Rights Campaign (childparentrights.org) e. Florida Family Policy Council (flfamily.org) f. American Family Association (afa.net) g. Concerned Women for America (concernedwomen.org or cwfa.org) h. Heritage Foundation (heritage.org and heritageaction.com) i. Genspect (Genspect.org) j. Catholic Medical Association (cathmed.org) k. Fight for Schools (fightforschools.com) l. Family Research Council (frc.org or frcaction.org) m. Moms for Liberty (momsforliberty.org, libertysrq.com) n. America First Legal (aflegal.org or athospr.com) o. Independent Women's Forum (iwf.org) p. Christopher Rufo (ajt@christopherrufo.com, chrisrufo@protonmail.com, or crufo@manhattan-institute.org)

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 electronic communications sent by the listed individuals. To be clear, however, American Oversight still requests that complete email and text message chains be produced, displaying both sent and received messages. This means, for example, that District Aide Shannon Shephard's response to an email from one of the listed organizations and the

initial received message are both responsive to this request and should be produced.

2. All email communications (including any email messages, attachments, or calendar invitations) sent or received by any of the Representative or staff listed below regarding (1) the January 11, 2023 Gender Dysphoria Services memorandum sent by Director Chris Spencer to the Chairs of all State University Board of Trustees¹ or (2) the information collected in response to the memorandum, including any analysis or next steps.
 - a. House Speaker Paul Renner
 - b. Chief of Staff Allison Carter
 - c. District Aide Shannon Shephard
 - d. Representative Sam Garrison
 - e. Legislative Aide Ryan Kimmey
 - f. Rep Thomas Leek
 - g. Legislative Aide Stephanie Wohlford
3. All formal or informal planning documents, memoranda, or guidance containing or reflecting analysis of the information collected in response to the January 11, 2023 Gender Dysphoria Services memorandum sent by Director Chris Spencer to the Chairs of all State University Board of Trustees.

For all parts of this request, please provide all responsive records from October 15, 2022, through the date the search is conducted.

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**

¹ Memorandum from Chris Spencer, Director Office of Policy and Budget, to Chairs of all State University Board of Trustees, January 11, 2023, available at <https://subscriber.politicopro.com/f/?id=00000185-c6e5-de44-a7bf-eef78e920000>.

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.²

² American Oversight currently has approximately 16,000 followers on Facebook and 112,800 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Feb. 27, 2023); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Feb. 27, 2023).

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 or (202) 848-1319.

Sincerely,

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