



March 23, 2023

**VIA EMAIL**

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

Office of Representative Robert Alexander Andrade  
222 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Office of Representative Stan McClain  
418 The Capitol  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Office of Representative Randy Fine  
214 House Office Building  
402 South Monroe Street  
Tallahassee, FL 32399-1300

Office of Representative Chip LaMarca  
209 House Office Building  
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) between (a) any of the individuals listed below, and (b) anyone communicating on behalf of the



Manhattan Institute, including, but not limited to, the domain ending in manhattan-institute.org.

- a) Rep. Robert Alexander Andrade
- b) Legislative Aide Trevor Schaettle
- c) Rep. Stan McClain
- d) Legislative Aide Ryan Thomas
- e) Rep. Randy Fine
- f) Legislative Aide Anna Budko
- g) Rep. Chip LaMarca
- h) Legislative Aide Samantha Verner

Please provide all responsive records from February 1, 2022, through the date the search is conducted.

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 Rep. Chip LaMarca Lange received a mass-distribution news clip email from the Manhattan Institute and forwarded that email to another individual with his own commentary, that subsequent message would be 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 agency on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully

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<sup>1</sup> American Oversight currently has approximately 16,000 followers on Facebook and 112,600 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Mar. 23, 2023); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Mar. 23, 2023).

releasing the requested records, please contact Ben Sparks at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 873-1741.

Sincerely,

/s/ Ben Sparks  
Ben Sparks  
on behalf of  
American Oversight