



July 18, 2019

VIA ELECTRONIC MAIL

Olivia Boney
Executive Office of the Governor
400 S. Monroe St.
Tallahassee, FL 32399
DeSantis.OpenGov@eog.myflorida.com

Re: Public Records Request

Dear Ms. Boney:

Pursuant to Florida's public records law, as codified at Fla. Stat. Chapter 119, American Oversight makes the following request for records.

Last fall, then-candidate for governor Ron DeSantis publicly suggested that he would try to incentivize the Trump Organization to come to Palm Beach, Florida, insisting that he could "save [them] a lot of money."¹ American Oversight seeks records to reveal whether Governor DeSantis has offered particular tax breaks or other incentives to the Trump Organization to entice them to build in Palm Beach.

Requested Records

American Oversight requests that the Executive Office of the Governor promptly produce the following records:

All communications since January 8, 2019 (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp), calendar invitations, or other communications) between the Florida officials listed below and any individual associated with the Trump Organization LLC, the Trump Foundation, or Trump Hotels, including but not limited to the following individuals:

- 1) Donald "Don" Trump Jr.
- 2) Eric Trump

¹ See Geoff Earle, "We Can Save You a Lot of Money": Trump-Loving Florida Governor Candidate DeSantis Says at Trump Rally He Will Invite Don Jr. and Eric to Move the Trump Organization to Palm Beach and Dangles Tax Break, DAILYMAIL.COM (Nov. 4, 2018, 1:44 AM), <https://www.dailymail.co.uk/news/article-6350565/DeSantis-dangles-tax-break-Trump-Organization-moves-Palm-Beach.html>.



- 3) Ivanka Trump
- 4) Jared Kushner
- 5) George Sorial
- 6) Amanda Miller
- 7) Alan Garten
- 8) Matthew Calamari
- 9) Lawrence Glick
- 10) Ron Lieberman
- 11) Allen Weisselberg
- 12) Andrew Weiss
- 13) Jill Martin
- 14) Deirdre Rosen
- 15) Eric “Ed” Danziger
- 16) Sherri Dillon
- 17) Adam L. Rosen
- 18) Rhona Graff
- 19) Jim Petrus
- 20) Anyone communicating from an email address ending with
@trumporg.com, @trump.com, @trumphotels.com, @jkfamily.com, or
@ijkfamily.com.

We request that you search the records of the following Florida officials:

- 1) Governor Ron DeSantis or anyone communicating on his behalf, including an executive assistant, personal assistant, or scheduler.
- 2) Chief of Staff Shane Strum
- 3) Deputy Chief of Staff Adrian Lukis
- 4) Deputy Chief of Staff James Blair
- 5) Cabinet Affairs Director Beau Beaubien
- 6) Director of Communications Helen Aguirre Ferré
- 7) DC Office director Katherine Anne Russo
- 8) Anyone communicating on behalf of any of the above individuals, including executive assistants, personal assistants, or schedulers.

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. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages),

voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.

- In conducting your search, please understand the terms “record,” “document,” and “information” in their 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 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 prior messages sent or received in that email chain, as well as any attachments to the email.
- In addition, American Oversight insists that the Office of the Governor 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; agencies 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 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 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, we 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 the Governor's office on this request. If you do not understand any part of this request, please contact Sara Creighton at foia@americanoversight.org or (202) 869-5245.

Sincerely,

A handwritten signature in blue ink, appearing to read "Austin R. Evers", with a long horizontal flourish extending to the left.

Austin R. Evers
Executive Director
American Oversight