



October 21, 2019

VIA ELECTRONIC MAIL

Laquisha Persak
Public Records Coordinator
Florida Senate
404 South Monroe Street
Tallahassee, FL 32399
publicrecordsrequests@flsenate.gov

Re: Public Records Request

Dear Ms. Persak:

Pursuant to Article 1, Section 24 of the Florida Constitution and Florida Senate Rule 1.48, American Oversight makes the following request for records.

Requested Records

American Oversight requests that the Florida Senate promptly produce the following:

1. All e-mail communications (including complete email chains, email attachments, calendar invitations, and calendar invitation attachments) sent by (a) any of the members of the Florida Senate and staff listed in Column A below to (b) any of the individuals or entities listed in Column B below.

In an effort to accommodate the Senate and reduce the number of responsive records to be processed and produced, American Oversight has limited the email portion of its request to emails sent by the individuals in the Senate and anyone acting as their chief of staff, scheduler or assistant. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both the sent messages and the prior received messages in each email chain. This means, for example, that both the individual's response to an email from a listed entity and the initial received message are responsive to this request and should be produced.

2. All non-email or text communications (including letters, memoranda, or other communications) between (a) any of the members of the Florida Senate and staff listed in Column A below and (b) any of the individuals or entities listed in Column B below.



Column A: Florida Senate Officials	Column B: External Individuals & Entities
<ul style="list-style-type: none"> • Sen. Lizbeth Benacquisto • Sen. Anitere Flores • Sen. David Simmons • Sen. Travis Hutson • Sen. Dennis Baxley • Sen. Oscar Braynon • Anyone serving as a Scheduler, Assistant or Chief of Staff, or similar role to the Senator 	<ul style="list-style-type: none"> a) Matthew Raymer, Republican State Leadership Committee b) Edith Jorge, Republican State Leadership Committee c) David Abrams, Republican State Leadership Committee d) David Kanevsky, Republican State Leadership Committee e) Stami Williams, Republican State Leadership Committee f) Dee Duncan, Republican State Leadership Committee g) Austin Chambers, Republican State Leadership Committee h) Adam Kincaid, National Republican Redistricting Trust i) Scott Walker, National Republican Redistricting Trust j) Guy Harrison, National Republican Redistricting Trust k) Jason Torchinsky, National Republican Redistricting Trust l) Gail Gitcho, National Republican Redistricting Trust m) Lauren Bryan, National Republican Redistricting Trust n) Ronald Keith Gaddie, Ph.D. o) Dale Oldham, Geographic Strategies p) Eric Opiela q) Debra Levine, Skyline Consulting r) Doug Johnson, National Demographics Corporation s) Jeff Timmer, Two Rivers Public Affairs t) Janet Thornton, Ph.D. u) Nicholas Goedert, Ph.D. v) Sean Trende w) Clark Benson, Polidata x) Cleta Mitchell y) John Morgan z) Thomas Farr aa) Chris Jankowski bb) Karl Rove cc) Ed Gillespie dd) Mike (or Michael) Wild ee) Joel Raupe

	<ul style="list-style-type: none"> ff) Thomas Hofeller gg) Hans von Spakovsky, Heritage Foundation hh) J. Christian Adams ii) Anyone communicating on behalf of Geographic Strategies LLC jj) Anyone communicating on behalf of Fair Lines America kk) Anyone communicating with an email address ending in @polidata.org ll) Anyone communicating with an email address ending in @gop.com or @rnchq.org
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Please provide all responsive records from November 8, 2016, to 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 fees.

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. Where applicable, 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 the Senate 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 the Senate 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.¹

We share a common mission to promote transparency in government. American Oversight looks forward to working with the Senate 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 Christine H. Monahan at records@americanoversight.org or (202) 918-7117.

Sincerely,



Austin R. Evers
Executive Director
American Oversight

¹ American Oversight currently has approximately 12,300 page likes on Facebook and 54,800 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight/> (last visited Oct. 10, 2019); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited Oct. 10, 2019).