



November 4, 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 Public Records Officer:

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

Press reporting indicates that during his campaign for Governor, Ron DeSantis was in contact with the president's personal attorney, Rudy Giuliani, and one of Giuliani's business associates, Lev Parnas. Giuliani and Parnas have both been reportedly involved in efforts of the Trump administration to pressure Ukraine to investigate former Vice President Joe Biden and his son.¹ Parnas has since been arrested along with his fellow Florida business associate Igor Fruman, and prosecutors have cited attempts to influence U.S. politics on behalf of Ukrainian officials.²

Requested Records

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

All records reflecting communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp), telephone call logs, calendar invitations, calendar entries, meeting notices, meeting agendas, informational material, draft legislation, talking points, any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, or other materials) between (a) Rudy Giuliani, Victoria Toensing, Joseph diGenova, Lev Parnas, Igor Fruman, or David Correia and (b) any of the Florida officials listed below:

¹ Gary Fineout, *Indicted Giuliani Associated Joined DeSantis on Last-Minute Campaign Swing*, POLITICO (Oct. 21, 2019, 4:30 PM), <https://www.politico.com/states/florida/story/2019/10/21/indicted-giuliani-associate-joined-desantis-on-last-minute-campaign-swing-1225738>.

² *Id.*



- i. Governor Ron DeSantis or anyone communicating on his behalf, including an executive assistant, personal assistant, or scheduler.
- ii. Chief of Staff Shane Strum
- iii. Deputy Chief of Staff Adrian Lukis
- iv. Deputy Chief of Staff James Blair
- v. Executive Assistant Amelia Keaton
- vi. Cabinet Affairs Director Beau Beaubien
- vii. Director of Communications Helen Aguirre Ferré
- viii. DC Office Director Katherine Anne Russo
- ix. Director of External Affairs Mara Gambineri
- x. Former Director of External Affairs Justin Caporale
- xi. External Affairs Deputy Director Drew Meiner
- xii. Anyone communicating on behalf of any of the above individuals, including executive assistants, personal assistants, or schedulers.

To the extent that the Florida government officials specified above conducted official business with named individuals using personal or private email or text messaging accounts (or email accounts associated with Governor DeSantis's campaign, such as email addresses ending in rondesantis.com), American Oversight considers those records responsive to this request.

Please provide all responsive records from January 8, 2019, 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 fees.

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "records" 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 the Executive 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; 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 that the Executive Office of the Governor 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.³

We share a common mission to promote transparency in government. American Oversight looks forward to working with the Executive Office of the Governor on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully releasing

³ American Oversight currently has approximately 12,300 page likes on Facebook and 55,700 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight/> (last visited October 30, 2019); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited October 30, 2019).

the requested records, please contact Christine H. Monahan at records@americanoversight.org or (202) 918-7117.

Sincerely,

A handwritten signature in blue ink that reads "Austin R. Evers". The signature is fluid and cursive, with a long horizontal flourish extending to the left.

Austin R. Evers
Executive Director
American Oversight