



April 21, 2020

VIA FACSIMILE

Indiana Government Center South
302 W. Washington St., 5th Floor
Indianapolis, IN 46204
Fax: (317) 232-7979

Re: Public Information Request

Dear Records Custodian:

Pursuant to the Indiana Access to Public Records Act (APRA), Ind. Code § 5-14-3, American Oversight makes the following request for records.

Requested Records

American Oversight requests that the Office of the Attorney General produce the following within seven days:

All email communications and text messages (including emails, text messages, calendar invitations, and attachments thereto) between a) any of the Indiana state officials listed in column A below, and b) any of the external individuals or entity representatives listed in column B below:

Column A: Indiana State Officials	Column B: External Individuals & Entities
<ol style="list-style-type: none">1. Curtis Hill, Attorney General, or anyone communicating on his behalf (such as a scheduler or assistant)2. Aaron Negangard, Chief Deputy Attorney General3. Patricia McMath, Assistant Chief Deputy Attorney General4. Mary Beth Bonaventura, Chief of Staff5. Sam Criss, Deputy Chief of Staff	<ol style="list-style-type: none">1. Any employee or representative of the Republican Attorneys General Association (including, but not limited to, anyone communicating from an email address ending in @republicanags.com)2. Any employee or representative of the Rule of Law Defense Fund (including, but not limited to, anyone communicating from an email address ending in @rldf.org or @ruleoflawdefensefund.org)



<p>6. Shelley Triol, Director of Communications and Strategic Initiatives</p>	<p>3. Louisiana Attorney General Jeff Landry, or anyone communicating on his behalf (such as an assistant or scheduler)</p> <p>4. Georgia Attorney General Chris Carr, or anyone communicating on his behalf (such as an assistant or scheduler)</p> <p>5. Texas Attorney General Ken Paxton, or anyone communicating on his behalf (such as an assistant or scheduler)</p>
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Please provide all responsive records from September 1, 2019, to the date the search is conducted.

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, we 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.

Pursuant to Ind. Code § 5-14-3-8(b), American Oversight asks that no fees be charged in connection with processing this request for records. To the extent your office anticipates charging any fees in connection with this request, we ask that you so inform us in advance.

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 you 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 Khahilia Shaw at records@americanoversight.org or 202.539.6507.

Sincerely,



Austin R. Evers
Executive Director
American Oversight

¹ American Oversight currently has approximately 15,400 page likes on Facebook and 102,200 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight/> (last visited Apr. 14, 2020); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited Apr. 14, 2020).