



April 14, 2021

VIA FACSIMILE

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

Re: Public Records Request

Dear Public Official:

Pursuant to the Indiana Access to Public Records Act (APRA), Ind. Code §§ 5-14-3-1 et seq., American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office produce the following records within seven days:

All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) Attorney General Todd Rokita or Chief of Staff Torri Lorres, and (b) any of the outside individuals listed below, that contain any of the key terms listed below.

Please provide all responsive records from January 17, 2021, through the date a search is conducted.

Outside Individuals:

- a. Alabama Attorney General Steve Marshall, or anyone communicating on Marshall's behalf (such as a Chief of Staff, assistant, or scheduler)
- b. Arizona Attorney General Mark Brnovich, or anyone communicating on Brnovich's behalf (such as a Chief of Staff, assistant, or scheduler)
- c. Arkansas Attorney General Leslie Rutledge, or anyone communicating on Rutledge's behalf (such as a Chief of Staff, assistant, or scheduler)
- d. Louisiana Attorney General Jeff Landry, or anyone communicating on Landry's behalf (such as a Chief of Staff, assistant, or scheduler)



- e. Missouri Attorney General Eric Schmitt, or anyone communicating on Schmitt's behalf (such as a Chief of Staff, assistant, or scheduler)
- f. Oklahoma Attorney General Mike Hunter, or anyone communicating on Hunter's behalf (such as a Chief of Staff, assistant, or scheduler)
- g. South Carolina Attorney General Alan Wilson, or anyone communicating on Wilson's behalf (such as a Chief of Staff, assistant, or scheduler)
- h. Texas Attorney General Ken Paxton, or anyone communicating on Paxton's behalf (such as a Chief of Staff, assistant, or scheduler)
- i. Interim Parler CEO Mark Meckler, or anyone communicating on Meckler's behalf (such as an assistant or scheduler)
- j. Gab CEO Andrew Torba, or anyone communicating on Torba's behalf (such as an assistant or scheduler)
- k. Judicial Crisis Network President Carrie Severino, or anyone communicating on Judicial Crisis Network's behalf
- l. Conservative Action Project Chairman Alfred S. Regnery, or anyone communicating on Regnery's behalf (such as an assistant or scheduler)
- m. U.S. Senator Mike Braun, or anyone communicating on Braun's behalf (such as a Chief of Staff, assistant, or scheduler)
- n. U.S. Senator Todd Young, or anyone communicating on Young's behalf (such as a Chief of Staff, assistant, or scheduler)

Key Terms:

- 1. Vanita
- 2. Gupta
- 3. VG
- 4. "big five"
- 5. "big 5"
- 6. censorship
- 7. Amazon
- 8. Bezos
- 9. Apple
- 10. Cook
- 11. Facebook
- 12. Zuckerberg
- 13. Google
- 14. Pichai
- 15. Twitter
- 16. Dorsey

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 Rokita received a

mass-distribution news clip email referencing a key term listed here, that initial email would not be responsive to this request. However, if Rokita forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

Pursuant to Ind. Code § 5-14-3-8(b), American Oversight asks that no fees be charged in connection with searching for or reviewing potentially responsive records. To the extent your office anticipates charging any copying fees for this request in excess of \$100, please notify us prior to incurring such fees.

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.
- 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.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages.
- 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.¹ 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 by the agency 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.

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

¹ Ind. Code § 5-14-3-6(a).

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 agency 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.

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.²

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, please contact Mehreen Rasheed at records@americanoversight.org or (202) 848-1320.

Sincerely,

/s/ Mehreen Rasheed
Mehreen Rasheed
on behalf of
American Oversight

² American Oversight currently has approximately 15,700 page likes on Facebook and 106,200 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Apr. 13, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Apr. 13, 2021).