



July 12, 2021

VIA EMAIL

Director, Office of Public Records
107 West Gaines Street, Suite 228
Tallahassee, FL 32399-1050
PublicRecordsRequest@myfloridalegal.com

Re: Public Records Request

Dear Public Records Officer:

Pursuant to Article I, section 24(a), of the Florida Constitution, and Florida's public records laws, as codified at Fla. Stat. Chapter 119, American Oversight makes the following request for records.

Requested Records

American Oversight requests that the Florida Office of the Attorney General promptly produce the following:

1. All email communications (including emails, email attachments, complete email chains, and calendar invitations) between (a) Attorney General Ashley Moody, or anyone communicating on Moody's behalf, such as a chief of staff, scheduler, or assistant, and (b) the former U.S. Department of Justice (DOJ) officials listed below:

DOJ Officials

- a. Deputy Associate Attorney General Brian Pandya
- b. Deputy Assistant Attorney General Daniel Feith
- c. Associate Deputy Attorney General Christopher Grieco
- d. Senior Counselor Brady Toensing
- e. Senior Counselor Gary Barnett

For item 1 of this request, please provide all responsive records from September 20, 2020, through January 20, 2021.

2. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) between (a) Attorney General Ashley Moody, or anyone communicating on Moody's behalf, such as a chief of staff, scheduler, or assistant, and (b) the external individuals listed below that (c) contain the key terms specified below.



External Individuals

- a. Elizabeth Murrill, Louisiana Solicitor General
- b. Benjamin Flowers, Ohio Solicitor General
- c. Beau Roysden, Arizona Solicitor General
- d. John Sauer, Missouri Solicitor General
- e. Nicholas Bronni, Arkansas Solicitor General
- f. Lynn Fitch, Mississippi Attorney General
- g. Michelle Williams, Chief of Staff to the Mississippi Attorney General
- h. Ken Paxton, Texas Attorney General
- i. Zina Bash, former Senior Counsel in the Office of Attorney General Ken Paxton
- j. Todd Rokita, Indiana Attorney General
- k. David Johnson, former Chief Counsel in the Advisory Division in the Office of the Indiana Attorney General
- l. Aaron Negangard, former acting Indiana Attorney General
- m. Florida Senator Ana Rodriguez

Key Terms

1. "Social media platforms"
2. "model legislation"
3. "Big Tech"
4. Censorship
5. "Deceptive and Unfair Trade Practices Act"
6. FDUTPA
7. "First Amendment protections"
8. "Antitrust violation"
9. "Antitrust violations"
10. "Antitrust violator"
11. Facebook
12. Twitter
13. Zuckerberg
14. TikTok
15. YouTube
16. Instagram
17. Dorsey
18. "SB 7072"
19. "Senate Bill 7072"

For item 2 of this request, please provide all responsive records from September 20, 2020, through May 25, 2021.

Please notify American Oversight of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fee.

American Oversight insists that your agency 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 your agency 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

¹ American Oversight currently has approximately 15,650 page likes on Facebook and 106,200 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited July 12, 2020); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited July 12, 2020).

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, have any questions, or foresee any problems in fully releasing the requested records, please contact Taylor Stoneman at records@americanoversight.org or (202) 848-1319.

Sincerely,

/s/ Taylor Stoneman
Taylor Stoneman
on behalf of
American Oversight