



August 20, 2021

VIA EMAIL

Representative Chuck Gray
PO Box 51842
Casper, WY 82605
Chuck.Gray@wyoleg.gov

Re: Public Records Act Request

Dear Public Records Custodian:

Pursuant to the Wyoming Public Records Act, Wyo. Stat. §§ 16-4-201 et seq., American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office produce the following records within seven business days:¹

1. Records reflecting the expenses and costs incurred by Representative Chuck Gray related to Rep. Gray's trip to Phoenix, Arizona on or around June 18, 2021.²

To the extent your office has aggregated records sufficient to show all relevant expenses and costs, such as spreadsheets, American Oversight would accept production of such records as sufficient. To the extent your office does not have an aggregated record of these costs, American Oversight requests records reflecting those costs, such as receipts, invoices, charge card or credit card statements, and reimbursement requests.

Relevant expenses may include, but are not limited to, hotel or other lodging costs; costs for air travel, rental car, or other transportation companies; costs incurred for government transportation; the cost of meals or refreshments; and per diem payments.

¹ To the extent the requested records are not available within seven business days, please provide an update at that time. *See* Wyo. Stat. §§ 16-4-202(b), (c)(i). Pursuant to the Wyoming Public Records Act, all records should be released no more than thirty calendar days "unless good cause exists preventing release." *Id.* § 16-4-202(c)(iii).

² Associated Press, *Wyoming Rep. Chuck Gray Pays Visit to Arizona Election Audit*, Casper Star Tribune, updated July 24, 2021, https://trib.com/news/state-and-regional/govt-and-politics/wyoming-rep-chuck-gray-pays-visit-to-arizona-election-audit/article_2f72cf59-b38d-5ae1-8ff4-e9fa49ad4acd.html.



Relevant expenses include costs associated with the travel of Rep. Gray, and of any staff members, family members, or other individuals travelling with him.

2. Any handouts, agendas, summaries, or notes created by or provided to Rep. Gray as part of or in relation to his trip to Phoenix, Arizona on or about June 18, 2021.

Responsive records would include, but not be limited to, electronic or hard-copy documents provided to Rep. Gray during his tour of audit facilities, and formal or informal descriptions or analyses of the Maricopa County election audit created by Rep. Gray or any member of his staff.

Please provide all responsive records from June 1, 2021, through June 30, 2021.

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

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.
- 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. 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 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.

- If a request is denied, please provide a written statement of the grounds for denial and, if applicable, state specifically why it is not reasonable to segregate portions of the record for release.³
- 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 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.⁴

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

³ See Wyo. Stat. § 16-4-203(e).

⁴ American Oversight currently has approximately 15,700 page likes on Facebook and 106,600 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited July 29, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited July 29, 2021).

understand any part of this request, please contact Emma Lewis at records@americanoversight.org or (202) 919-6303.

Sincerely,

/s/ Emma Lewis

Emma Lewis
on behalf of
American Oversight