



October 25, 2021

VIA MAIL & EMAIL

Indiana House of Representatives
200 W. Washington St.
Indianapolis, IN 46204

Representative Todd Huston
200 W. Washington St.
Indianapolis, IN 46204
Email: H37@iga.in.gov

Representative Peggy Mayfield
200 W. Washington St.
Indianapolis, IN 46204
Email: H60@iga.in.gov

Representative Joanna King
200 W. Washington St.
Indianapolis, IN 46204
Email: H49@iga.in.gov

Representative Michelle Davis
200 W. Washington St.
Indianapolis, IN 46204
Email: H58@iga.in.gov

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 calendar entries or invitations (and attachments thereto) indicating meetings between (a) Representatives Todd Huston, Peggy Mayfield, Joanna King, Michelle Davis, or anyone serving as their chiefs of staff, assistants, or schedulers, and (b) any of the following outside individuals and groups (including, but not limited to, at the specified domain names):



- a. Alliance Defending Freedom (adflegal.org, adfmedia.org)
- b. America First Legal (aflegal.org)
- c. American Family Association (afa.net)
- d. Americans United for Life (aul.org)
- e. Charlotte Lozier Institute (lozierinstitute.org)
- f. Concerned Women for America (cwfa.org, concernedwomen.org)
- g. David Daleiden
- h. Family Research Council and Family Research Council Action (frc.org; frcaction.org)
- i. First Liberty (firstliberty.org)
- j. FreedomWorks (freedomworks.org)
- k. GOP (gop.com, rnchq.com, msgop.org)
- l. Hacker Stephens LLP (hackerstephens.com)
- m. Heritage Foundation and Heritage Action for America (heritage.org, heritageaction.com)
- n. Home School Legal Defense Association (hsllda.org)
- o. Human Coalition and Human Coalition Action (hucoaction.org, humancoalition.org)
- p. Independent Women's Forum (iwf.org)
- q. James Bopp, Jr. (bopplaw.com)
- r. Janet Porter and Faith to Action (f2a.org)
- s. Jonathan Mitchell (jonathan@mitchell.law)
- t. Liberty Counsel (lc.org)
- u. Life Legal Defense Foundation (lldf.org)
- v. Live Action (liveaction.org)
- w. March for Life and March for Life Action (marchforlife.org, marchforlifeaction.org)
- x. Mark Crutcher and Life Dynamics (lifedynamics.com)
- y. National Association of Christian Lawmakers (christianlawmakers.com)
- z. National Pro-Life Alliance (prolifealliance.com)
- aa. National Right to Life Committee (nrlc.org)
- bb. Personhood Alliance (personhood.org)
- cc. Pro-Life Action League (prolifeaction.org)
- dd. Students for Life (studentsforlife.org)
- ee. Susan B. Anthony List (sba-list.org)
- ff. Thomas More Society (thomasmoresociety.org)
- gg. Troy Newman, Cheryl Sullenger, and Operation Rescue (operationrescue.org)
- hh. Indiana Right to Life (irtl.org)
- ii. Right to Life Southwest Indiana (rtlswin.org)
- jj. Right to Life of Northeast Indiana (ichooselife.org)
- kk. Right to Life of Indianapolis (rtlindy.org)

Please provide all responsive records from January 14, 2021, through the date the request is received.

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

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. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- In conducting your search, please understand the terms “record,” “document,” and “information” in their 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.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 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

¹ Ind. Code § 5-14-3-6(a).

² American Oversight currently has approximately 15,630 followers on Facebook and 108,900 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Oct. 22, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Oct. 22, 2021).

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