



December 1, 2021

VIA EMAIL

Director of Open Government
Florida House of Representatives
402 South Monroe Street
Tallahassee, FL 32399
opengovernment@myfloridahouse.gov

Representative Anthony Sabatini
29 House Office Building
402 South Monroe Street
Tallahassee, FL 32399-1300
Anthony.Sabatini@myfloridahouse.gov

Re: Public Records Request

Dear Public Records Officers:

Pursuant to Article I, section 24(a), of the Florida Constitution, and Florida House Rule 14, Part One, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office promptly produce the following:

All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) and text messages or messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, Twitter direct messages, Facebook messages, WhatsApp, Signal, Telegram, or Parler) between Representative Anthony Sabatini and the external individuals listed below (including, but not limited to, communications from the email addresses or domains specified below).

Please provide all responsive records from June 1, 2020, through the date the search is conducted.

Specified Parties:

1. Mike Lindell
2. Former Wisconsin Supreme Court justice Michael Gableman (mgableman@yahoo.com or wispecialcounsel@gmail.com)
3. Sidney Powell, and/or anyone communicating on behalf of Sidney Powell, P.C. (@federalappeals.com)
4. Former National Security Advisor Mike Flynn (@generalflynn.com), Joseph Flynn, or anyone communicating on behalf of America's Future



5. Rudolph Giuliani, and/or anyone communicating on his behalf (such as Jo Ann Zafonte, Christianne Allen, Beau Wagner (@giulianisecurity.com, @giulianipartners.com, or @gdcillc.com))
6. Cleta Mitchell (cleta@cletamitchell.com, cmitchell@foley.com, or @bradleyfdn.org)
7. Thomas Datwyler (tcdatwyler@gmail.com), or anyone communicating on behalf of the American Voting Rights Foundation
8. Phill Kline (phillklineva@gmail.com), Jacqueline Timmer, or anyone communicating on behalf of the American Voter's Alliance (@got-freedom.org)
9. Jenna Ellis, and/or anyone communicating on behalf of Liberty University's Falkirk Center (@falkirkcenter.com) or the Thomas More Society (@thomasmoresociety.org) or the American Greatness Fund (@americangreatnessfund.com)
10. Corey Lewandowski
11. Earl Eugene Kern, and/or anyone communicating on behalf of Wake Technology Services, Inc. (@waketsi.com)
12. Ben Cotton, and/or anyone communicating on behalf of CyFir (@cyfir.com)
13. Heather Honey, and/or anyone communicating on behalf of Haystack Investigations (@haystackinvestigations.com)
14. Doug Logan, and/or anyone communicating on behalf of Cyber Ninjas (@cyberninjas.com)
15. Colonel Phil Waldron (phil@onewarrior.com, JWRLLC@gmail.com, or p@bonfiresearch.org), Russell Ramsland (ryuks9sq@alliedspecialops.us), James Keet Lewis III (keet@jkeetlewis.com) and/or anyone communicating on behalf of Allied Security Operations Group (@alliedspecialops.us)
16. Jovan Hutton Pulitzer (jovanhuttonpulitzer@gmail.com)
17. Patrick Byrne or anyone communicating on behalf of the America Project (@americaproject.com)
18. Matthew DePerno or anyone communicating on behalf of the DePerno Law Office (@deper nolaw.com)
19. Catherine Engelbrecht or anyone communicating on behalf of True the Vote (@truethevote.org)
20. John Eastman (jeastman@claremont.org or @attorneyeastman.com)
21. Lin Wood, including (lwood@fightback.law)
22. Shiva Ayyadurai (vashiva@vashiva.com)
23. Hogan Gidley, Ken Blackwell (kennethblackwell693@gmail.com) or anyone communicating on behalf of the America First Policy Institute (@americafirstpolicy.com)
24. Barry Farah (barry@barryfarah.com)
25. Douglas Frank (drdouglasfrank@protonmail.com)
26. Ron Watkins

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

American Oversight seeks all 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 includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

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, American Oversight and your office 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

We share a common mission to promote transparency in government. American Oversight looks forward to working with your office 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

¹ American Oversight currently has approximately 15,600 page likes on Facebook and 109,100 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Nov. 17, 2021); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Nov. 17, 2021).