



March 7, 2022

VIA EMAIL

Executive Office of Governor Ron DeSantis
Attn: Office of Open Government
400 S Monroe St., Suite 209
Tallahassee, FL 32399
desantis.opengov@eog.myflorida.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.

In January 2022, Governor Ron DeSantis presented his own congressional district boundary proposal to Florida legislative leaders. After the legislature opted not to formally consider his proposal, Governor DeSantis indicated he would veto any map that would keep intact Florida's 5th District.¹ DeSantis also later introduced an additional congressional district boundary proposal.²

American Oversight seeks records to shed light on Governor DeSantis' efforts to influence Florida's redistricting processes.

Requested Records

American Oversight requests that the Executive Office of Governor Ron DeSantis promptly produce the following:

1. All email communications (including emails, email attachments, calendar invitations, and calendar invitation attachments), text messages (including complete text message threads or conversations), and messages on messaging platforms (such as Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp) sent or received by any of the Executive Office of Governor Ron DeSantis personnel listed below regarding redistricting in Florida.

¹ Jane C. Timm, *DeSantis Digs in on Redistricting Fight Against Fellow Republicans*, NBC News (Feb. 14, 2022, 4:31 AM), <https://www.nbcnews.com/politics/elections/desantis-digs-redistricting-fight-fellow-republicans-rcna15966>.

² Kent Justice, *DeSantis Proposes Another Republican-Favored Congressional Map*, WJXT (Feb. 15, 2022, 11:27 PM), <https://www.news4jax.com/news/local/2022/02/16/desantis-proposes-another-republican-favored-congressional-map/>.



Executive Office of Governor Ron DeSantis Personnel:

- i. Ron DeSantis, Governor
- ii. James Uthmeier, Chief of Staff
- iii. Taylor Schrader, Director of Executive Staff
- iv. Taryn Fenske, Director of Communications
- v. Christina Pushaw, Press Secretary
- vi. Savannah Kelly Jefferson, Director of External Affairs
- vii. Ryan Newman, General Counsel
- viii. Stephanie Kopelousos, Director of Legislative and Intergovernmental Affairs
- ix. Chris Spencer, Director of Policy & Budget
- x. Drew Meiner, Senior Advisor
- xi. Any Executive Office of the Governor employee involved in the drafting or finalization of any congressional district boundary proposals

For part 1 of this request, 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 General Counsel Ryan Newman received a mass-distribution news clip email referencing Florida's congressional redistricting processes, that initial email would not be responsive to this request. However, if General Counsel Newman forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

2. All email communications (including emails, email attachments, calendar invitations, and calendar invitation attachments), text messages (including complete text message threads or conversations), and messages on messaging platforms (such as Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp) between (a) any of the Executive Office of Governor Ron DeSantis personnel listed above in Part 1, and (b) any of the Florida Legislative members or their staff listed below (including, but not limited to, at the listed email addresses).

Florida Legislative Members and Staff:

- i. Rep. Tom Leek (Thomas.Leek@myfloridahouse.gov or tleek@foundationrp.com), or Legislative Aide Stephanie Benedict (Stephanie.Benedict@myfloridahouse.gov)
- ii. Rep. Randy Fine (Randy.Fine@myfloridahouse.gov or randy@voterandyfine.com), or Legislative Aide Anna Budko (Anna.Budko@myfloridahouse.gov)
- iii. Rep. Tyler Sirois (Tyler.Sirois@myfloridahouse.gov or tylersiroisfl@gmail.com), or Legislative Aide Angelique Rinaldi (Angelique.Rinaldi@myfloridahouse.gov)

- iv. Rep. Kaylee Tuck (Kaylee.Tuck@myfloridahouse.gov, kayleetuck@gmail.com, or kaylee@kayleetuck.com), or Legislative Aide Michael Johnsen (Michael.Johnsen@myfloridahouse.gov)
 - v. Leda Kelly, Staff Director – Redistricting Committee (Leda.Kelly@myfloridahouse.gov)
 - vi. Donna Ellerkamp, Administrative Lead – Redistricting Committee (Donna.Ellerkamp@myfloridahouse.gov)
 - vii. Sen. Ray Rodrigues (rodrigues.ray.web@flsenate.gov or rodrigues.ray@flsenate.gov), Secretary Alexander Quinones (quinones.alexander@flsenate.gov), or Legislative Assistants Krissy Kulavic (kulavic.krissy@flsenate.gov) and Timothy Morris (morris.timothy@flsenate.gov)
 - viii. Sen. Jennifer Bradley (bradley.jennifer.web@flsenate.gov, bradley.jennifer@flsenate.gov, or jennifer@votejenniferbradley.com), or Legislative Assistants Katelyn Heffley (heffley.katelyn@flsenate.gov), Mary Lee (lee.mary@flsenate.gov), and Tonya Shays (shays.tonya@flsenate.gov)
 - ix. Sen. Doug Broxson (broxson.doug.web@flsenate.gov, broxson.doug@flsenate.gov, or doug@dougbroxson.com), Secretary Victoria Bell (bell.victoria@flsenate.gov), or Legislative Assistants Janice Gilley (gilley.janice@flsenate.gov) and Hal George (george.hal@flsenate.gov)
 - x. Sen. Aaron Bean (bean.aaron.web@flsenate.gov, bean.aaron@flsenate.gov, or aaron@aaronbean.com), or Legislative Assistants Chad Corcoran (corcoran.chad@flsenate.gov), Chesten Goodman (goodman.chesten@flsenate.gov), Dee Alexander (alexander.dee@flsenate.gov), and Henry Mahler (mahler.henry@flsenate.gov)
 - xi. Sen. Gayle Harrell (harrell.gayle.web@flsenate.gov, harrell.gayle@flsenate.gov, or gharrell@gayleharrell.com), or Legislative Assistants Ann Bolduc (bolduc.ann@flsenate.gov), Carrie Lira (lira.carrie@flsenate.gov), and Karen Sweeney (sweeney.karen@flsenate.gov)
 - xii. Jay Ferrin, Staff Director – Committee on Reapportionment (ferrin.jay@flsenate.gov)
 - xiii. Danna Ivey, Committee Administrative Assistant – Committee on Reapportionment (ivey.dana@flsenate.gov)
3. All email communications (including emails, email attachments, calendar invitations, and calendar invitation attachments), text messages (including complete text message threads or conversations), and messages on messaging platforms (such as Slack, GChat, Google Hangouts, Lync, Skype, or WhatsApp) between (a) any of the Executive Office of Governor Ron DeSantis personnel listed above in Part 1, and (b) any of the external individuals listed below or anyone communicating on behalf of any of the organizations listed below (including, but not limited to, at the listed email addresses and domains).

External Parties:

- i. Adam Kincaid, Guy Harrison, Scott Walker, Jason Torchinsky (jtorchinsky@hvjt.law or jtorchinsky@holtzmanvogel.com), Gail Gitcho, Lauren Bryan, Mike Pompeo, Chris Christie, Karl Rove, or anyone communicating on behalf of National Republican Redistricting Trust or National Republican Redistricting PAC
- ii. Fair Lines America or the Fair Lines Foundation
- iii. Steve Bannon
- iv. Republican Party of Florida Chair Joe Gruters (joegruters@gmail.com or gruters.joe@flsenate.gov), Vice Chair Christian Ziegler (christian@christiangop.com or ctieglar@scgov.net), Secretary Kristy Banks, or Assistant Secretary Clint Pate
- v. Pat Bainter, Dan Ball, Matt Pesek, or anyone communicating on behalf of Data Targeting Inc. (@datatargeting.com)
- vi. National Republican Congressional Committee (@nrcc.org)
- vii. Republican State Leadership Committee (@rslc.gop)
- viii. John Morgan, or anyone communicating on behalf of Applied Research Coordinates
- ix. Clark Bensen, or anyone communicating on behalf of PoliData (@polidata.org)

Please provide all responsive records from December 1, 2021, through the date the search is conducted.

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 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.³

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

³ American Oversight currently has approximately 15,700 page likes on Facebook and 117,800 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Mar. 7, 2022); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Mar. 7, 2022).

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