



August 30, 2022

**VIA EMAIL**

Office of the Secretary of State  
Montana Capitol Building, Rm 260  
P.O. Box 202801  
Helena, MT 59620-2801  
[sosbusiness@mt.gov](mailto:sosbusiness@mt.gov)

**Re: Public Records Act Request**

Dear Public Records Officer

Pursuant to Art. II, Section 9, of the Montana Constitution, and the Montana Public Records Act, Mont. Code Ann. §§ 2-6-1001 et seq., American Oversight makes the following request for records.

**Requested Records**

American Oversight requests that your office produce the following records in a timely manner:

1. All records reflecting any costs reimbursed or paid directly by your agency for any reimbursable expenses attributable to trips undertaken by Secretary of State Christi Jacobsen from January 4, 2021, through the date the search is conducted.

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. Relevant expenses include costs associated with the travel of Secretary Jacobsen and of any staff, family, or invited guests accompanying the secretary of state on these trips.

2. All email communications (including emails, complete email chains, 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) Secretary of State Christi Jacobsen (or anyone communicating on her behalf, such as an assistant or scheduler) and (b) any of the external individuals or entities listed below (including, but not limited to, at the listed email addresses or domains).

Please provide all responsive records from June 1, 2022, through the date the search is conducted.



External individuals or entities:

1. Al Hartman, Jenny Limcher, or anyone communicating on behalf of Hartman REIT (@hi-reit.com)
2. Ashe Epp (asheinamerica@protonmail.com)
3. Boris Epshteyn (bepshteyn@gmail.com)
4. Bruce Marks (marks@mslegal.com)
5. Catherine Engelbrecht, Courtney Kramer, or anyone communicating on behalf of True the Vote (@truethevote.org)
6. Cleta Mitchell (cleta@cletamitchell.com, cmithcell@foley.com, or @bradleyfdn.org)
7. Charles Bundren III (charles@bundrenlaw.com)
8. Chris Witt, Earl Eugene Kern, or anyone communicating on behalf of Wake Technology Services, Inc. (@waketsi.com)
9. Christina Bobb (christina@cgbstrategies.com), Chanel Rion, Graham Ledger, or anyone communicating on behalf of One America News Network (grahamledger@yahoo.com or @oann.com)
10. Doug Logan or anyone communicating on behalf of Cyber Ninjas (@cyberninjas.com)
11. Dr. Douglas Frank (drdouglasfrank@protonmail.com or Doug@ToolsForAnalysis.com)
12. Emily Newman, Todd Sanders, or anyone communicating on behalf of The America Project (enewman@protonmail.com, todd@krknsys.com, or @americaproject.com)
13. Former National Security Advisor Michael Flynn, Joseph Flynn, Charles Flynn, Michael Flynn Jr., or anyone communicating on behalf of America's Future (@generalflynn.com or @americasfuture.net)
14. Hans von Spakovsky (@heritage.org)
15. Holly Kasun (hollyataltitude@protonmail.com)
16. Ivan Raiklin (ivan@raiklin.com, ivan.raiklin@gmail.com or socialmediaraiklin@gmail.com)
17. Jacqueline Timmer, Mary Coran, or anyone communicating on behalf of the American Voter's Alliance (@got-freedom.org)
18. Jenna Ellis or anyone communicating on behalf of Liberty University's Falkirk Center or the American Greatness Fund (jenna.ellis.esq@gmail.com, @falkirkcenter.com or @americangreatnessfund.com)
19. Joe Oltmann (joe@fecunited.com or joe@pinbn.com)
20. J. (John) Christian Adams, Maureen Riordan, Logan Churchwell (@publicinterestlegal.org or @electionlawcenter.com)
21. John Eastman or anyone communicating on behalf of Constitutional Counsel Group (jeastman@claremont.org, jeastman@chapman.edu, johneastman@colorado.edu, jeastman@ccg1776.com, jeastman562@gmail.com, or @ccg1776.com)
22. John Lott (johnrlott@crimeresearch.org or johnrlott@gmail.com)
23. Jovan Hutton Pulitzer (jovanhuttonpulitzer@gmail.com)
24. Julie Fisher (aztrumplican@gmail.com, azwinos@gmail.com, or Julie.fisher@az51.org)

25. Katherine Friess (kfriess@protonmail.com)
26. Ken Bennett (kbennettaz7@gmail.com, kbazsos@gmail.com, or kjbennettaz@gmail.com)
27. Kris Kobach (kkobach@gmail.com or kris@kriskoback.com)
28. Kurt Olsen (kurtols@protonmail.com)
29. Matt Braynard (matt@braynard.com) or anyone communicating on behalf of Look Ahead America (@lookaheadamerica.org)
30. Matthew DePerno (matthew@depernelaw.com)
31. Jeff Young, Michele Replogle, or anyone communicating on behalf of Cause of America (@causeofamerica.org)
32. Mike Lindell (mike@mypillow.com or @mypillow.com)
33. Mike Roman (mikeroman@protonmail.com)
34. Montana Representative Brad Tschida (brad.tschida@mtleg.gov, brad@themilkywhey.com, betschida54@gmail.com, tschida4mthouse@outlook.com, brad@tschida.org)
35. Montana Senator Theresa Manzella (Theresa.manzella@mtleg.gov or theresa@manzellaformontana.com)
36. Phill Kline, Luis Cornelio, or anyone communicating on behalf of the Thomas Moore Society or the Amistad Project(phillklineva@gmail.com, lcornel001@citymail.cuny.edu, luis.cornelio@protonmail.com, or @thomasmooresociety.org)
37. Colonel Phil Waldron (phil@onewarrior.com or @bonfiresearch.org)
38. Rob Natelson (rob.natelson1@gmail.com)
39. Russell Ramsland, J. Keet Lewis, or anyone communicating on behalf of Allied Security Operations Group (yrku9sqs@protonmail.com, keet@jkeetlewis.com, or @alliedspecialops.us)
40. Seth Keshel (skeshel@protonmail.com, skeshel@gmail.com, or @captk.com)
41. Shawn Smith (luftsas@gmail.com, ratioinvictus@protonmail.com)
42. Shiva Ayyadurai (vashiva@vashiva.com or @echomail.com)
43. Sidney Powell (sherlock1776@protonmail.com, sp@seeking-justice.org or sidney@federalappeals.com)
44. William Olson (williamolsen@lawandfreedom.com or wjo@mindspring.com)
45. Any employee or representative of the Conservative Partnership Institute (@conservativeparternship.org)

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 Secretary Jacobsen received a mass-distribution news clip email from an external individual or entity, that initial email would not be responsive to this request. However, if Secretary Jacobsen forwarded that email to another individual with her own commentary, that subsequent message would be responsive to this request and should be produced.

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 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. 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.<sup>1</sup>

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, please contact Taylor Stoneman at [records@americanoversight.org](mailto:records@americanoversight.org) or (202) 848-1319.

Sincerely,

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

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<sup>1</sup> American Oversight currently has approximately 16,000 followers on Facebook and 118,800 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Aug. 18, 2022); American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Aug. 18, 2022).